

OPG Comments on RD/GD 338, “Security Measures for Sealed Sources”

Comment #	RD Document Section/ Excerpt of Section	OPG Issue	OPG Suggested Change
<u>NWMD-1</u>	<u>4</u>	<u>Use of the word “vehicle” is somewhat ambiguous. In section 4.1.1, does the requirement apply to the tractor, the trailer or both?</u>	<u>Define vehicle consistent with IAEA TS-R-1, paragraph 247.</u>
<u>NWMD-2</u>	<u>4.2.1</u>	<u>A relatively low-mass container should likely be fixed to the vehicle, to prevent it from being carried off easily. A vehicle could be broken into and a relatively light container stolen before the operator of the vehicle could respond to the alarm.</u>	<u>Determine a mass (100 kg?) under which the container must be secured to the vehicle.</u>
<u>NWMD-3</u>	<u>Table B</u>	<u>Information in Table B is in a different order than source material in sections 3 and 4. Also, the information is not organized by activity (storage/use vs. transportation), which makes it more difficult for a user to determine the requirements applicable to the activity.</u>	<u>Make Table B into 2 tables, one for storage and use of sealed sources, and one for transportation aspects.</u>
<u>NWMD-4</u>	<u>4.2.2</u>	<u>If a licensee uses an external carrier, does the licensee have to provide the security awareness training or is it the responsibility of the carrier?</u>	<u>Please clarify.</u>
<u>NWMD-5</u>	<u>4.2.2</u>	<u>Awkward wording in “verify that . . . all persons employed by the carrier transporting the sealed sources have successfully completed security screening”.</u>	<u>Reword to say “all persons employed by the carrier and who will be involved in transporting the sealed sources . . .”</u>

<u>NWMD-6</u>	<u>4.2.2</u>	<u>Specifies inspection and testing requirements for licensee's transport vehicles. However, a license is not required to transport most sealed sources. A licensee could hire a carrier to transport their material in the carrier's vehicle, and that vehicle would not have any requirement for the security devices to be inspected or tested.</u>	<u>Add wording to address this scenario.</u>