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**From:** SEARCY Tina (ORANO) <personal information redacted>  
**Sent:** July 16, 2019 1:41 PM  
**To:** Consultation (CNSC/CCSN)  
**Cc:** OC-McCleanRegulatory  
**Subject:** Orano Comments on Amendments to the Radiation Protection Regulations  
**Attachments:** 190716 Orano Comments on Radiation Protection Regulations Amendments.pdf

Mr. Torrie,

Please find attached Orano Canada Inc.'s comments on pending amendments to the *Radiation Protection Regulations*. Should you have any questions, please contact Dale Huffman at [personal information redacted](#).

Regards,

*Tina Searcy*, BSc  
Regulatory Relations Manager  
Orano Canada Inc.  
[personal information redacted](#)



This e-mail communication is private. If you are not the intended recipient, please notify me at the telephone number shown above or by return e-mail and delete this communication and any copy immediately. Do not forward it. Thank you.



July 16, 2019

Brian Torrie  
Director General  
Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
P.O. Box 1046, Station B  
280 Slater Street  
Ottawa, ON Canada K1P 5S9  
cnsc.consultation.ccsn@canada.ca

**Re: Orano Canada Inc.'s comments on proposed Amendments to the  
*Radiation Protection Regulations***

**Orano Canada Inc.**

817 45th Street West  
Saskatoon SK S7L 5X2  
Tel.: +1 (306) 343-4500

Please accept this correspondence as Orano Canada Inc.'s (Orano) comments on proposed amendments to the *Radiation Protection Regulations*. Orano is in general agreement with the comments provided by our industry colleagues and is providing the following comments on uranium production-specific concerns for your consideration, see attachment 1.

If you require additional information or clarification regarding this submission, please feel free to contact the undersigned at [dale.huffman@orano.group](mailto:dale.huffman@orano.group) or (306) 343-4058.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dale Huffman", is written over a light blue horizontal line.

Dale Huffman  
Vice President,  
Health, Safety, Environment & Regulatory Relations

cc: Orano Distribution

TS/DH



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ATTACHMENT 1

Section	Comment/Issue	Suggested Change	Impact on Industry
RIAS, Section 13	Details of how to calculate radon progeny contribution to effective dose are not included in the current draft of <i>REGDOC-2.7.2, Dosimetry: Ascertaining Occupational Dose</i> as indicated in the RIAS. Removing specification from the regulations without including it in a guidance document significantly impacts licensees of uranium mines and mills.	The regulations should detail the method for how to include radon progeny exposure in the calculation for total effective dose, with the dose conversion factor of particular importance.	Removing guidance on how to calculate radon progeny contributions to effective dose from both the regulations and REGDOC makes it unclear what process and dose conversion factor from WLM to mSv must be used in the determination of dose from radon progeny. Determining doses from radon progeny is very important for uranium mines and mills licensees to ensure that dose limits are being met. Orano agrees with its colleagues that there needs to be clarity on the actual calculation, and that proposed changes to the dose conversion factor should be carried out through a regulatory impact analysis.
1, 5(1), 5(2), 19(f)	The definitions of radon and radon progeny should apply exclusively to exposures occurring as a direct result of CNSC-licensed activities, and not to naturally occurring radon and radon progeny.	Amend the regulation to clarify that it applies to exposures occurring as a direct result of CNSC-licensed activities (e.g. uranium mines and mills) only and that radon and radon progeny from natural sources do not need to be included in effective dose calculations.	Including radon and radon progeny without clarification could lead to the misinterpretation that doses due to naturally occurring radon progeny must be ascertained and reported on. The concept of effective dose sufficiently captures the whole-body dose from all radiation sources as a result of licensed activities.
1(1)	Contrary to what is stated in the RIAS, the definitions of <i>working level</i> and <i>working level month</i> have not been included in the current draft of <i>REGDOC-2.7.2</i> to support the calculation of effective dose.	This term should be defined for uranium mines and mills only throughout the document.	Uncertainty and inconsistency.
21	Licensees have concerns with proposed changes to Section 21. For licensees with facilities designed	Add a subsection to exempt the application of s. 21(1) to facilities whose purpose is the bulk processing	Maintenance of a significant number of signs creates an administrative burden with no corresponding safety benefit. Operating experience shows too many



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	for the purpose of processing large volumes of radioactive material, e.g. uranium mills, there is little benefit to putting signage on every entrance to those facilities indicating that the radioactive material is present.	and handling of radioactive materials.  Also, licensees request the rationale behind the change to posting to vehicles in Section 21. Industry believes this better covered by a REGDOC.	signs can actually create confusion, not clarity.
22	Orano shares the concern that Section 24.1 is overly broad as currently written. This concern also relates to RIAS Section 22: Proposed new section on radiation detection and measurement instrumentation.	The language used is important in this area and agree that a workshop is a valuable place to discuss this proposal. Along with other licensees, Orano urges the CNSC to amend 24.1 to read, "Every licensee must ensure that instruments and equipment that are used for radiation measurements related to direct, personnel protection are selected, tested and calibrated for their intended use."	"Radiation measurements" include measurements taken by nuclear density gauges other detectors related to radiation processes which are not related to radiation protection. As written, it would be illegal to have a licenced fixed gauge out of calibration because it would not be "calibrated for" its intended use, simply because it 'measures radiation', while having nothing to do with Radiation Protection.
Part 3	Orano shares that with a subjective concept such as ALARA (as low as reasonably achievable) being explicitly tied to administrative monetary penalties as they are in Items 2-5 in Part 3.	Remove the phrase "as low as reasonably achievable" from Items 2, 3, 4, 5.	It is inappropriate to link a subjective concept with a monetary penalty.