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Sent: June 12, 2020 4:37 PM
To: Consultation (CNSC/CCSN)
Cc: Hollerbaum, Rhonda [VCH]; Gonzalez, Marjorie [VCH]; Jongedijk, Elizabeth [VCH]
Subject: Feedback on Regdoc 1.6.2 from PHSA
Attachments: Provincial Health Services Authority_Regdoc 1.6.2 Feedback.pdf

Categories: Green Category

On behalf of PHSA Regional Safety Team, please see attached our comments and feedback on REGDOC-1.6.2 Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences.

Kind Regards,

Roxana

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10 June 2020

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Ref.: PHSA comments on REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences

Thank you for the opportunity for Provincial Health Services Authority (PHSA) to review REGDOC-1.6.2 Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences. Please see attached our comments and feedback for consideration.

If you have any questions with respect to the comments and feedback attached, please contact Roxana Ralea at roxana.ralea@vch.ca.

Thank you,

Marjorie Gonzalez, PhD MCCPM
Medical Physicist and Regional RSO Nuclear Medicine

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Elizabeth Jongedijk
Regional Manager – Quality and Process Improvement

Section 3.1

1. The following statements are contradictory:

First paragraph: … "The responsibilities of an RSO are not an adjunct to another job task;"…

Fourth paragraph: …"For low-risk use types, the RSO could manage the RPP on a part-time basis, while assuming other duties."…

In our opinion the statement in red in the first paragraph should be removed since the complexities of the program are already discussed in the fourth paragraph.

2. The phrase "complex RPP" is unclear.

Fourth paragraph: …"For overseeing a complex RPP, the regulatory burden is expected to be handled by a full-time RSO."

In our opinion, the word complex should be described using details such as the number of sites and scope of licensed activities carried out.

Section 3.3

1. Please outline what accredited programs are available to fulfill the regulatory requirements and CNSC's expectation stated in this section.

Section 3.5

1. We suggest the following sentence include the text in red.

Second paragraph: The frequency and extent of the refresher training should be determined, defined and documented by the licensee.

2. The phrase "lengthy absence" is unclear.

Third Paragraph: "Refresher training should be provided at least every five years and when changes to regulatory requirements or licence conditions occur, or in the case of an RSO's return after a lengthy absence."

Will CNSC define lengthy absence or will the licensee determine for their own program?

Section 3.6.1

1. The phrases “short-term absence” and “long-term absence” are unclear.

Please provide guidelines for the length of time for each situation.

2. We don’t believe it is necessary to directly notify the CNSC in all cases of short-term absences of the corporate RSO. We believe email or telephone re-direction is sufficient enough to notify others of the short term absence and would include the contact information to reach the alternate RSO.

Second paragraph: … “The CNSC should be notified in the case of short-term absences.”

3. We suggest that the second and third paragraphs of section 3.6.1 should be moved to be in Section 3.6 as they describe absences of the corporate RSO.

Section 3.6.2

1. We propose the first paragraph to read as follows (changes shown in red):

When a licence application to conduct licensed activities in more than one geographical location is submitted, a site RSO should be appointed for each licensed location. The site RSO should maintain a presence in the workplace by periodically observing work practices to implement and maintain the RPP. The purpose of designating a site RSO is to ensure direct RPP oversight for all locations. The site RSO can be designated by the corporate RSO.

We believe there is no need for a site RSO to be present at the site location at all times, but, periodically observing work practices may be sufficient based on the licensed activity that takes place at each site.

2. We propose the second paragraph to read as follows (changes shown in red):

The site RSO should report to the corporate RSO on all radiation protection matters. The site RSO should have appropriate levels of experience, training and authority based on the activities of the licensee. At a minimum, they should have knowledge of the regulatory requirements of the licensed activity and all reporting requirements. The roles and responsibilities and the lines of authority for the site RSO must be clearly defined. It should be clear that the corporate RSO remains the person responsible for overseeing the overall RPP and is the main liaison with the CNSC.

3. This section does not mention the need for an alternate Site RSO. To maintain the effectiveness of the RPP, we believe a designated alternate Site RSO may be necessary during a Site RSO’s temporary absence based on the licensed activity that takes place at each site.

Section 5.2

1. What type of assessment should licensees perform every five years?

Fourth paragraph: "Although the RPP should be assessed at least every five years, the frequency of the assessments will depend on the complexity of the RPP and the risk associated with the licensed activity."

We believe the type of assessment recommended every five years should be described in more detail. Section 5.2.1 recommends self-assessment to be performed at least annually. The two statements seem contradictory.

2. We suggest that an example/template of a Management Review appropriate for an RPP be provided. An example of a self-assessment (Type II Inspection Worksheets) was provided in Section 5.2.1.

Section 5.2.3

1. We propose the first paragraph to read as follows (changes shown in red):

Management reviews are conducted by the applicant authority or applicant authority representative at a set frequency as an oversight activity to assess the effectiveness of the RPP and to proactively make improvements as required.

Section 5.3

1. We believe this section should contain only the information in the first paragraph minus the last sentence:
"In accordance with the regulatory requirements established in the General Nuclear Safety and Control Regulations, Radiation Protection Regulations, and Packaging and Transport of Nuclear Substances Regulations, 2015, an investigation must be conducted to determine the probable cause of an event. Event investigation is a formal process to identify the probable cause or causes of an event, including the technical issues and organizational factors underlying the event. This determination is also used to help develop corrective actions to restore the effectiveness of the RPP and to prevent the occurrence of a similar event."

The remainder of text in this section is confusing and it seems to be incomplete and not consistent with the existing regulations. For example, the remaining paragraphs in this section do not include all reportable incidents, and include examples of incidents that are not currently reportable e.g. events are determined to be systematic. In addition, the last paragraph is unclear if it refers to CNSC corrective actions or internal corrective actions.

Section 5.4

1. We feel that electronic evidence of approval of the Radiation Safety Manual by the RSO and AA is acceptable. We suggest the first sentence of the second paragraph to include this option.