

Hunt, Jane

From: Thomas A. Levey
Sent: Wednesday, June 06, 2012 4:05 PM
To: Consultation
Subject: Comment(s) on 3.0 section of RD/GD-338: Security Measures for Sealed Sources document

Comment: Table B states that two intrusion detection systems is required. This is unreasonable for a vehicle that transports isotopes. If the table is meant only for fixed storage facilities, then it should be made clear in the table or prior to the table. It is costly enough just to manage and maintain one detection system.

In Table B, Access Control - It is unreasonable to have a 2 person rule. The word "Optimal" should be removed.

Table B - Response protocol - Contacting local law enforcement is okay for an actual incident, but unreasonable for any type of drill or testing of effective response time. Law enforcement does not appreciate false alarms or checking responses.

Table B- Vehicle Security - GPS, two person rule, and trustworthiness verification is again unreasonable. There are economic factors related to very high costs for implementing these 3 items. The wording of "Optimal" is not clear. Because it is written into the guide will lead to expectations that it is required at some point later. There should be no license conditions set forth if this is to only be a guide.

Table B - Criminal Checks - This has not been an expectation in the past. It appears that this is following the USA NRC requirements. Again there is an economic factor related to the cost of performing this check. Even if the check is performed, what is the criteria for preventing an operator from having access to sources. For example if an operator has a criminal record for theft does this mean they cannot be allowed access?

And the table implies that the licensee is responsible for carriers to have a verification check. This is totally unreasonable. Licensees have no control over the carriers for implementation of security measures. CNSC needs to have a system in place where carriers must meet CNSC expectations separate from the user of isotopes. Maybe Carriers should have a transportation license and implement a specific radiation protection and security measures systems.

Section 3.3.4.1 - The process should be much simpler. There should be some exceptions if a person is a Canadian, has a resume that can be verified, two references to call on past performance, and has a NRCan Photo complete with an EDO certificate. Or a valid Canadian passport. If they are provided with these, this should meet the verification of trustworthiness.

If the person is total unknown and has none of the above, then it makes sense that a criminal records check shall be done.

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