

Comments on the CNSC's RD/GD -338 (Security measures for sealed sources)

Note: I am working as a medical physicist and a RSO in a radiation oncology department of a hospital. All the comments are based my personal working environment.

1. It is a very good document regarding to the safety measures for sealed radioactive sources/materials.
2. Some security measures can be implemented by our efforts supported by the hospital, but a few measures are out off our control (transportation of sealed source) and are not practical (criminal record name check for staff, constructors, and vehicle driver).
3. As mentioned in the draft document, most source carrier are not licensed by the CNSC, therefore, they will not enforce this document during their transportation of radioactive materials (class 7) and they will not follow our instruction as well. So we can not control any transportation procedure for transportation of radioactive materials. Based on my experiences on importing and exporting Ir-192 source from and to the US, we can not control US Customs to open a secured package by cutting a security seal; source carrier delivery a radioactive materials based on building to building basis, and without identifying dangerous goods with regular packages, meaning that they treat class 7 packages (at least) as regular packages to delivery to a hospital receiving department only, not to final users.
4. For staff background checks, this causes even more shortage of staff. Those background checks may result in their name on the black name list of the security departments of Canada and US, meaning that this may result in unpredicted problems during travel in Canada and in the US. Due to this reason, current staff / potential new staff may refuse to work as a radiation technologist to provide services on treating cancer patient with radiation therapy.
5. Suggestions: (1) The SNSC should work with Transportation Canada and Transportation of US to achieve an agreement enforcing source carrier to follow the CNSC regulations; (2) The CNSC should work with therapeutic machine manufactures in order to reach an agreement that they follow all CNSC's regulations and provide the trustworthiness and reliability document for their employee as constructor for us.

Commented by LiHeng Liang on June 8, 12
(Email: lliang@jgh.mcgill.ca, Tel: 514-3408222x 2180))