

Please consider these comments to the draft document REGDOC-1.5.1:

#### *Chapter 2.4*

*Re-certification is not useful, needed, or justified for radiation devices that do not require maintenance as there is no reason to believe that their safety could have changed since they were originally built. Specifically, the re-certification process proposed for a radiation device already in use does not ensure that the device is any more or less safe to use then when it was originally built.*

*Further, a potential conflict of interest exists when the manufacturer wants to sell the new products and does not re-certify the old products (especially if they are not being produced anymore).*

*We suggest the following changes to chapter 2.4:*

- *Any new radiation device must be certified according to this document*
- *If a radiation device is still produced by the manufacturer, the device must be re-certified according to this document in order for the manufacturer to continue production.*
- *All radiation devices that are in use and require maintenance, must have the maintenance up to date as per chapter D4 from the current document. The maintenance must be performed by a person authorized by the manufacturer or by the CNSC.*
- *All radiation devices in use that do not require maintenance (e.g. aerosol neutralizers containing Kr-85 sources, or sources used in removing aerosols from a balance containing Po-210), do not need re-certification.*

These comments are sent by the University of Toronto users and the Radiation Protection Service.

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