



July 31, 2018

VIA EMAIL

Mr. Brian Torrie
Director General, Regulatory Policy Directorate
Canadian Nuclear Safety Commission
280 Slater Street
PO Box 1046, Station B
Ottawa, ON K1P 5S9
cnscconsultation.ccsn@canada.ca

CAMECO CORPORATION
Corporate Office
2121 – 11th Street West
Saskatoon, Saskatchewan
Canada S7M 1J3

Tel 306.956.6200
Fax 306.956.6201
www.cameco.com

Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC-2.7.2, Volume II: Technical and Management System Requirements for Dosimetry Services

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-2.7.2, Volume II: Technical and Management System Requirements for Dosimetry Services (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

Cameco's experience is that S-106, Revision 1, *Technical and Quality Assurance Requirements for Dosimetry Services* (S-106) provides the appropriate detail necessary to achieve its purpose and we appreciate that the REGDOC retains the substance of this standard as recommended by industry in consultation on the radiation protection guidance suite.

However, we are concerned by the proposed reduction in the minimum testing levels (MTL) for natural uranium set out in Table 4 as well as the change in the accuracy and precision specifications for measurement quantities. Our concern arises because lung count measurement errors increase as the amount being measured decreases and thicker chest-wall overlays are applied. Further, errors also increase as the amount being measured decreases in urine. With this backdrop, it is unclear if the root mean squared error (RMSE) values set out in sections 4.2 and 4.5 of the REGDOC can be achieved at the reduced MTL. Until the impact of these changes (both the MTL reduction and the RMSE limit) can be assessed, particularly at increasing chest wall thicknesses, Cameco recommends that the MTL value as well as the accuracy and precision specifications in S-106 be retained in the REGDOC.

If you have any questions with respect to the above, then please contact the undersigned at 306-956-6685 or liam_mooney@cameco.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Liam Mooney", written over a light blue circular stamp.

R. Liam Mooney
Vice President
Safety, Health, Environment, Quality & Regulatory Relations
Cameco Corporation