From: Consultation
To: Belyea, Sean;
Subject: FW: Comments for REGDOC-2.10.1
Date: Monday, October 21, 2013 6:05:23 AM

From: Gration,Dale [Ontario] [mailto:Dale.Gration@ec.gc.ca]
Sent: Friday, October 18, 2013 12:50 PM
To: Consultation
Subject: Comments for REGDOC-2.10.1

Please consider the following comments regarding the abovementioned regulatory draft:

Section 2.1 – given the proximity of Darlington and Pickering (and the fact they are operated by the same organization) is there a need to include a hazard/risk assessment of a multi-facility scenario, similar to the IAEA DS457 considerations?

Section 2.3 – should consider the need for requirements/procedures outlining a "transition from normal operations to emergency operations" to account for the maintenance of regular site activities when staff are deployed to the emergency response organizations (ie. backfilling of normal operating positions when staff are tasked to the response).

Section 2.3.1 – does turnover briefings include transfer of authority if required? For example, if an authority falls ill, are there procedures to officially transfer the authority and communicate the transfer to other organizations?

Section 2.3.8 – consider including a requirement(s) to consult and work with off-site authorities/agencies on recovery (ie. interface and support for offsite recovery, similar to section 2.3.4 for response).

Section 2.3.8 – consider more detailed recovery plan requirements. For example:

a) development of recovery communication plan

b) ongoing security and access control as dictated by the situation

c) delineation, characterization, and long-term surveillance of the radiological situation in the environment

d) delineation, characterization, and long-term surveillance of the radiological situation in food products, drinking water

e) decontamination procedures/operations

f) clean-up and remediation procedures/operations

g) waste and radioactive waste management operations/plan

Regards,

Dale Gration

Environmental Emergencies – Compliance Promotion
Environmental Protection Operations Directorate | Direction générale de la protection de l'environnement
Environment Canada | Environnement Canada
4905 Dufferin Street
Toronto, Ontario M3H 5T4
Email: dale.gration@ec.gc.ca
Telephone: 416-739-5909
Mobile: 416-988-3592
Facsimile: 416-739-4953
www.ec.gc.ca

*** NOTE ***
The CNSC email security server scanned this email and found no potentially hostile or malicious content. To be safe, do not open attachments from unrecognized senders.

*** REMARQUE ****
Le serveur de sécurité de la CCSN a examiné ce courriel et n'y a trouvé aucun contenu potentiellement hostile ou malveillant. Pour protéger votre ordinateur, n'ouvrez pas les pièces jointes en provenance d'expéditeurs inconnus.