

OPG Comments on REGDOC-2.2.3, Personnel Certification: Radiation Safety Officers

#	RD/GD Document Section / Excerpt	OPG Issue	OPG Suggested Change (if applicable)
1.	Glossary	None provided in the document	Add to document
2.	Document title	There are other RSO roles, not associated with Class II facility – avoid confusion.	Change title to: Personnel Certification: Radiation Safety Officers, Class II Nuclear Facilities
3.	1.3 Exemption from Certification	<p>The document provides an exemption to Class II Nuclear Facilities (NF) for those RSO who are already certified under Class-I NF Regulations. However, it is not clear if an exemption exists for Class II NF for those who are already certified under section <u>15.01</u> to <u>15.06</u> of the Class II NF Prescribed Equipment Regulations.</p> <p><i>Please clarify exemption status for RSO of Class II NF who are currently certified under section 15.01 of Class II NF & Prescribed Equipment Regulations</i></p> <p><i>Please clarify what it meant by “Exempt”. Does it mean certification without examination, or is certification not required</i></p>	
4.	Section 2 point 2	Managing is not defined in the document and has a different meaning to the industry than implied	Replace “ <u>managing</u> ” with “ <u>oversight</u> ”
5.	Section 2	Missing responsibility for interpretation of regulations, policies and procedures.	<i>Add point 11 “Interpreting the regulations, policies and procedures applicable to radiation protection and for providing programmatic approvals where required.”</i>
6.	2. 1 Responsibility of Radiation Safety officer First Para. Second sentence	‘ .. An RSO may delegate some responsibilities or tasks to an assistant with appropriate qualifications to carry out designated duties; however, the oversight of <u>the radiation safety program</u> remains with certified RSO ”	<i>An RSO may delegate some responsibilities or tasks to an assistant with appropriate qualifications to carry out designated duties; however, the oversight of <u>radiation safety</u> remains with certified RSO ” Otherwise, for large corporation such as OPG this would not be an accountability of RSO</i>
7.	Section 3.3	This entire section has no relevance to the certification of an RSO.	<i>If there is a need to convey to information on regulation interpretation include as an appendix.</i>

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8.	Section 3.3	Applicable if section is added as an appendix. Referenced 15.04(b) but not referenced in section 1.4	<i>Add to section 1.4</i>
9.	3.3 & 3.3.1 Physical Presence of RSOs & Offsite facilities and close proximity locations	This RSO requirements only applies to Class II NF, so for OPG is it acceptable to have RSO located at one site (e.g. Whitby HPD & Lab) and the Class II facility is located at Darlington ?? <u>Not sure what 'contact' CNSC means?</u> <u>Please clarify "contact CNSC", is it in writing? Phone call adequate?</u> <u>What is the time frame? Is Pre-acceptance required?</u>	
10.	Section 4.3 Exam	No standard provided for conduct of the oral examination or exam preparation standard.	<i>Add section to detail, reference another standard or add details to appendix.</i>
11.	Section 4.3 Timelines	No timelines provided for notice or request for examination. With respect to application.	<i>Add process to request examination or timeline on when/how examination follows application.</i>
12.	Section 4.3 Exam content	The first two bullets of the exams content conflicts / is not as descriptive as Appendix A	<i>Replace first two bullets with the five point's notes in Appendix A:</i> <ul style="list-style-type: none"> - relevant provisions of the NSCA and its ensuing regulations - principles of radiation safety - radiation physics - operational activities and facilities which are to be licensed by the CNSC - Radiation Protection Program of the facility
13.	Section 4.3 General	Flow has gaps and timeline unclear	<i>Provide flow chart of process, indicating times between steps (min and max) and references to applicable section in the Reg Doc.</i>

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14.	Section 4.3.1.2 reference	Referenced 15.07 but not referenced in section 1.4	<i>Reference in section 1.4</i>
15.	Section 4.3.1.2	Lack of remedial process	Provide a remedial process to close a knowledge gap found in a narrow area. <i>Similar to the process available for Certified HP (RD204)</i>
16.	Section 4.3.1.2	Needs to be clear on reapplication or other means to be re-examined at a later date.	<i>Provide details on reapplication / re-examination at a later date.</i>
17.	Section 4.3.1.2.1	No indication as to when a candidate can reapply	<i>Provide language to support when a candidate can reapply</i>
18.	Section 4.3.2	Point 3 – “the RSO is otherwise incapable of performing duties” is covered by section 4.3.3	<i>Remove point 3</i>
19.	Section 4.3.2	Reason or basis not documented	Add sentence: <i><u>Basis for revocation will be documented to make clear what is required for reapplication in section 4.3.2.1</u></i>
20.	Section 4.3.2 last paragraph	“If for any reason, a certified RSO is decertified by the CNSC, that person must wait three years before being eligible for certification again.” Does not belong and contradicts direction provided elsewhere in the document	<i>Remove sentence from 4.3.2. Rewrite and include in section 4.3.2.1 to specify wait period and limits, and the basis/issue that needs to be dispositioned before ‘may reapply’.</i>
21.	Section 4.3.2.1	Title change	<i>Change title to “Certification following Revocation.”</i>
22.	Section 4.3.2.1	Lack of clarity in what is required: “request to be certified again”	<i>Replace with: A person who has their certificate revoked may reapply again if: 1 – the basis for revocation is no longer applicable 2 – the person successfully passes the requirements for certification.</i>
23.	Section 4.3.3	Referenced 15.05 but not referenced in section 1.4	<i>Reference in section 1.4</i>

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24.	Section 4.3.3	Missing scenario	<i>Add to scenarios – being incapable of performing duties from section 4.3.2</i>
25.	Section 4.3.3	Documentation of basis for Invalidation	<i>Add a paragraph requiring the documentation of the basis for invalidation and the requirements to correct this basis for section 4.3.3.1.</i>
26.	Section 4.3.3-4	<p>1. “The person has been away from RSO duties for an extended period of time, as described in section 4.5.2.” - the referenced section 4.5.2 does not exist, should likely be 4.4</p> <p>2. Tracking of certificate status can be confusing or difficult to manage. There should be formal correspondence between CNSC and licensee to document certificate status. For example , if a certificate is invalid for the reasons listed in this section, then the CNSC should notify the licensee via letter /email rather than leaving the certificate status open ended.</p>	<p>1. Change reference from 4.5.2 to 4.4</p> <p>2. Clarify how certificate status changes will be managed by CNSC and how these changes will be communicated to licensees.</p>
27.	Section 4.3.3.1	Title does not match 4.3.3	<i>Re-title to match language in 4.3.3 “Recertification following invalidation”</i>
28.	Section 4.3.3.1	Unclear and open ended	<i>Add the following sentence at the end of last paragraph section 4.3.3.1; “ Documented and agreed to by the Licensee at the time of invalidation.”</i>
29.	Section 4.3.5	Process timelines confusing	<i>As previously noted, suggest the creation of a flow chart to illustrate the timeline</i>
30.	Section 4.4.3	Referenced 15.1 but not referenced in section 1.4 Referenced 15.11 but not referenced in section 1.4	<i>Add Regulatory references to section 1.4</i>
31.	Section 4.4.3	Qualified basis	Define qualified as being eligible and meeting the requirement to be a successful applicant for certification.
32.	Section 4.4.3	365 days?	<i>Should state the 365 days is a rolling 365 day period.</i>

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33.	Section 5.1 Applicant Information A.3 Licensee Info Proof of Legal Status	In the case of corporation applying for certification of a potential RSO, such as OPG, the draft REGDOC requires submission of an “ official corporation profile report’ “ The information in this report includes , but is not necessarily limited to corporation’s legal name, corp. #, date of incorporation, and registered office address. When OPG applies for the renewal of a PROL , similar corporate information is provided, but not to the extent as required by draft REGDOC2.2.3. For example; an ‘official corporation profile” is not required by any of the applicable regulations, nor is it provided Information such as the applicants business name, address, corp.#, and evidence that applicant is the owner of the site are typical items that are provided.	<i>For corporations that are already licensed to operate Class I Nuclear facilities, it is recommended that requirement to provide “official corporation profile Report” be removed, and the information required to be submitted in this regards to be aligned to that which is required for applications pertaining to the aforementioned Class I Nuclear Facilities.</i> <i>Note: <u>This requirement is better required for initial ClassII Licence application only</u></i>
34.	Appendix A	The list of topics for examination do not align with section 4.3	<i>Align the list found in 4.3 with Appendix A Page 11.</i>
35.	Appendix A	Second to last paragraph implies a one refusal will result in no further opportunities. Needs to align with section 4.3.1.2.1	<i>Add clarification wording that RSO needs remedial training for new facility or option of replacement candidate.</i>
36.	Appendix B.2	Missing same language as found in B.1	<i>Add to first sentence “reviewed on a case-by-case basis.</i>