



The Ottawa Hospital | L'Hôpital
d'Ottawa

April 3 2019

Canadian Nuclear Safety Commission

Re: Comments on Reg Doc 3.1.3

Madam, Sir:

Please find enclosed the comments from The Ottawa Hospital Radiation and Laser Safety Department.

We think it is a very useful document that consolidates existing regulations and their reporting requirements into a single location. We also like that that it clearly outlines their expectations with respect to the notification of the duty officer.

Thank you for the opportunity to review Reg Doc 3.1.3: *Reporting Requirements for Waste Nuclear Substance Licensees, Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices*

Sincerely,

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Director and Corporate Radiation and Laser Safety Officer

The Ottawa Hospital

1)Table A, Section F: *Security*, Item 17 Guidance: *exposure devices, radiation devices or nuclear substances left unattended*

This guidance requires clarification. The reporting requirements are for a breach of security. Leaving a source unattended in an occupied Nuclear Medicine Department (for example) doesn't meet the requirement. We see this applying to radiography devices.

2)Table A, Section B: *Management system, human performance, conventional health and safety, financial status* Guidance, Item 4: *Serious illness, injury or death*

Illnesses and injuries that do not result directly from the licensed activity do not need to be reported. (e.g., the death of a patient in the hospital is not reportable but the death or injury of a patient as a result of malfunctioning certified prescribed equipment is reportable.)

This Guideline really depends on the how the patient died. Medical reasons, they don't need to be notified. A stuck source in a Brachy device, they need to be notified.

3)Table A, Section E: *Radiation Protection*, Item 12C Guidance: *NSCA 45(b) applies to every person who is aware of the event*

This guidance requires clarification. Is this applicable to non-designated areas? For example, if we found contamination more than prescribed limit outside the designated area (approved locations), does the duty officer needs to be notified?