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RADIATION SAFETY OFFICE

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Via E-mail

19 SEP 2018

Dear Sir/Madame:

RE : Comments on Draft REGDOC-3.1.3 Reporting Requirements for Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices

Thank you for the opportunity to comment on Draft REGDOC-3.1.3 Reporting Requirements for Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices.

I have three comments from "Guidance" examples in Table A and one observation:

Page 10 (PDF page 14), bottom, "Guidance: This includes non-compliances found during internal audits."

Comment: This guidance would be onerous on licensees and CNSC staff and could lead to Internal Audits being less collaborative . This should be revised or ideally deleted.

Page 33 (PDF page 37), bottom, Guidance…Examples include but are not limited to:

- [third bullet] exposure devices, radiation devices or nuclear substances left unattended

Comment: “unattended” is a surprising choice of words and two possibly unintended non-compliances come to mind:

1. could mean that a Nuclear Medicine Technologist (NMT) is in non-compliance if their SPECT/CT Gamma Camera is set up for Auto QC (which would make it a Radiation Device since it contains a sealed source) and they step out of the Imaging Room to fetch their patient or show the patient where the patient washroom is located – the NMT is still in the Nuclear Medicine department and they haven’t left an open source sitting in the open.
2. could mean that many universities and hospitals with “accessible” counting rooms containing Liquid Scintillation Counters (many of which are classified as Radiation Devices due to internal sealed sources) need to start being locked up, in many locations those “counting” rooms are not locked, have other analytical equipment shared by many researchers and CNSC Inspectors have not previously made adverse comments on those situations.

In neither scenario described above is the sealed source in the Gamma Camera or Liquid Scintillation Counter in a portable device subject to theft by a passer-by, it would require some dismantling of the apparatus to access the sealed source. Third “bullet” point should be revised.

Page 27 (PDF page 31), middle, “Guidance, Examples of possible overexposure [last bullet]:

- “Wrong patient (without any requisition) injected with or exposed to a nuclear substance”

Observation: CNSC typically does not require reports of things that are patient related, odd that this scenario is singled out.

Comment: If there is no requisition then this wouldn’t be a patient so I recommend that “patient” be changed to “person”, so then the last bullet would be

- Wrong person (without any requisition) injected with or exposed to a nuclear substance

Sincerely,

J. Dovyak

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