
From: Ahier, Brian (HC/SC)
Sent: July 15, 2019 1:42 PM
To: Consultation (CNSC/CCSN)
Subject: RE: Invitation to comment on proposed amendments to the Radiation Protection Regulations / Invitation à formuler des commentaires sur les modifications proposées au Règlement sur la radioprotection

To: Brian Torrie, Director General, Regulatory Policy Directorate, Canadian Nuclear Safety Commission

Reference: Canada Gazette, Part I, Volume 153, Number 24: Regulations Amending Certain Regulations Made Under the Nuclear Safety and Control Act (Radiation Protection). June 15, 2019.

Hello

Please find below comments from Health Canada, Radiation Protection Bureau concerning the above referenced draft Regulations.

Section 8:

Current proposed text:

8 (1) Every licensee must use a licensed dosimetry service to measure and monitor the doses of radiation received by and committed to nuclear energy workers who have a reasonable probability of receiving

- (a) an effective dose that is greater than 5 mSv in a one-year dosimetry period; and
- (b) an equivalent dose to the skin, or the skin of hands and feet, that is greater than 50 mSv in a one-year dosimetry period

Comment. Clauses 8(1)a and 8(1)b should be independent, ie, a licensed dosimetry service should be used if either (a) or (b) is satisfied. The following change is suggested:

8 (1) Every licensee must use a licensed dosimetry service to measure and monitor the doses of radiation received by and committed to nuclear energy workers who have a reasonable probability of receiving

- (a) an effective dose that is greater than 5 mSv in a one-year dosimetry period; **or**
- (b) an equivalent dose to the skin, or the skin of hands and feet, that is greater than 50 mSv in a one-year dosimetry period

Regards,

Brian Ahier

Director / Radiation Protection Bureau
Health Canada / Government of Canada
775 Brookfield Rd, Ottawa, ON, Canada K1A 1C1
personal information redacted

Directeur / Bureau de la radioprotection
Santé Canada / Gouvernement du Canada
775 chemin Brookfield, Ottawa, ON, Canada K1A 1C1
personal information redacted