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**From:** Bathurst, Mika <personal information redacted>  
**Sent:** July 16, 2019 10:20 AM  
**To:** Consultation (CNSC/CCSN)  
**Subject:** Canada Gazette, Part I, Volume 153, Number 24: Regulations Amending Certain Regulations Made Under the Nuclear Safety and Control Act (Radiation Protection), Comments from The Ottawa Hospital

To whom it may concern,

Thank you for the opportunity to provide comments regarding "Regulations Amending Certain Regulations Made Under the Nuclear Safety and Control Act (Radiation Protection)" in the Canada Gazette, Part I, Volume 153, Number 24. The Radiation & Laser Safety Department at The Ottawa Hospital wishes to submit the below comments/questions:

## **SectSection 22**

- In regard to the new requirement for licensees to appropriately select, use and maintain radiation detection and measurement instrumentation, it looks as if some sort of a calibration will be required for ALL detectors. However, it is unclear if that means source check or full calibration.

## **Regulatory Analysis: Cost and Benefits Section**

- The math is unclear. The listed wage used is \$62.50. However, once one does some back-calculations, the hourly rate shows as \$8.90 instead: (see details below). This is clearly too low.

"Assuming 10% of licensees may have an average of 5 hours' work to do, the CNSC estimates the one-time cost to be \$6,985." (Section 7).

Total # of licensees is 1570 so 10% is 157.

$\$6985 / (157 \times 5 \text{ hours}) = \$8.90/\text{hour}$

All the other lines are consistent with that number. Please clarify.

Thank you.

*Michèle Légaré, M. Sc., C-NRPP*

**Director and Corporate Radiation and Laser Safety Officer/ Directrice et principale responsable de la Radioprotection et de la Sécurité des lasers**

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