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**Written submission from the
Canadian Radiation Protection
Association**

**Mémoire de l'Association
canadienne de radioprotection**

**Regulatory Oversight Report on the
Use of Nuclear Substances in
Canada: 2019 and Class IB
accelerators in Canada: 2018-2019**

**Rapport de surveillance
réglementaire sur l'utilisation
des substances nucléaires au
Canada : 2018 et les accélérateurs
de catégorie IB au Canada : 2018 et
2019**

Commission Meeting

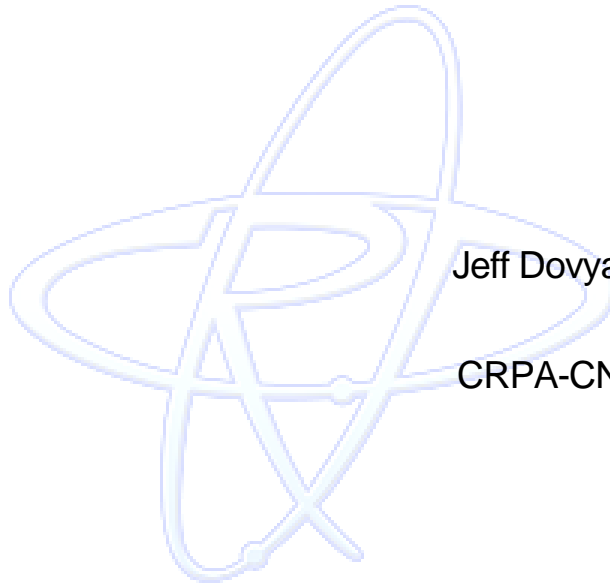
Réunion de la Commission

November 5, 2020

Le 5 novembre 2020

CRPA-CNSC Working Group
CRPA WG Member COMMENTS

**Regulatory Oversight Report on the
Use of Nuclear Substances in Canada: 2019**



Submitted by:

Jeff Dovyak RTNM, CRPA(R)
CRPA Co-Chair
CRPA-CNSC Working Group
25 SEP 2020

COMMENTS

Internal stakeholders polled in preparing our comments included:

- CRPA members of the CRPA-CNSC Working Group that was formed in 2014
 - Trevor Beniston, Stephane Jean-Francois, Jeff Dovyak

General Comments

As in 2018, the 2019 ROR does not seem to have been explicitly posted on the CNSC website, rather it was located as a Commission Member Document in the ‘meeting downloads’ section. While proactive Radiation Safety professionals might search out the ROR that applies to their area or areas, it’s not given much prominence on the CNSC web-site.

While the number of appendices attached to the 2019 ROR make it very comprehensive, the document is still somewhat cumbersome and unwieldy.

Combining two Regulatory Oversight Reports into one document make it even more cumbersome and unwieldy.

863 inspections are mentioned in the Executive Summary but the inspection totals in figures 2, 4, 6 and 8 don’t seem to add up to 863.

If the main purpose of the Regulatory Oversight Reports are to provide the Commission with various “State of the Union” reports the RORs probably hit the mark. It is our perception, however, that the RORs may not be of much value to licensees and the public. What is the actual objective or objectives of publishing the ROR?

Section 1.1– Compliance Performance

Performance in the packaging and transport SCA is not explicitly covered – we still believe that there are compliance concerns with Class 7 TDG and that this SCA should be explicitly addressed (same comment last **two** years).

It seems that the number of inspections is decreasing and the time per inspection is increasing – is that analysis correct?

It seems that the Radiation Protection SCA for Nuclear Medicine shows a steady decline for the past five years – are there any suggestions as to why? The continued decline in this SCA is of concern to the authors and has been flagged to the CRPA Board of Directors. Perhaps a CNSC-CRPA webinar on Radiation Protection in Nuclear Medicine is called for? There is also a decline in the Radiation Protection SCA for Portable Gauges – again, any suggestions as to why?

Perhaps the declining trends in the Radiation Protection SCA should be flagged more prominently in the body of the ROR, rather than details in an Appendix.

Past reports seemed to identify common area of non-compliance – that's not seen in the 2019 ROR. Listing the top 3 or top 5 common non-compliances would be useful for teaching.

Section 1.5 - Case Studies

While the case studies shown may be of interest to those with either a medical production background or a medical production facility in their area of responsibility, these case studies address very specific kinds of licensees. It's too bad that another licence type wasn't selected, say from Portable Gauge users.

Section 1.6 - Stakeholder Engagement

As stated in our comments to the 2017 & 2018 RORs, CRPA members continue to find CNSC outreach sessions very worthwhile and CNSC presentations and participation at our annual conference (except no 2020 conference due to COVID-19) priceless.

The *DNSR Newsletter* is another good tool for maintaining stakeholder engagement, and as noted in our comments to the 2016, 2017 and 2018 RORs, increasing publication frequency is desirable.

Although participation in the CRPA meeting is mentioned, the CRPA-CNSC Working Group is not mentioned.

Appendix E - Reported events

While the summary of reported events in Appendix E of the ROR is helpful, along with INES classification, Radiation Safety professionals in Canada would find on-line, CNSC-published "NRC-style" event reports to be even more helpful as noted in our comments on the 2016, 2017 and 2018 RORs. Root cause and summary of corrective actions are missing. A trend analysis appears to be missing. Perhaps that would be so much information as to warrant a separate publication - it is more likely that such a document

would be reviewed and used by NSRD RSOs compared to a Regulatory Oversight Report.

It is noted that events in Appendix L are much more descriptive than events described in Appendix E.

Typographical errors noticed in Appendix E have already been flagged to an NSRD staff member.

Appendix N – Regulatory Documents

Draft REGDOC -1.6.2 that was published 18 NOV 2019 as a consultation document does not seem to have been mentioned.

COMMENDATIONS

As stated in the past few years, the on-going ability of interested parties to watch Commission Meetings or Commission Hearings via webcast remains incredibly helpful to licensee staff, both for gaining an increased appreciation of CNSC expectations as well as in gathering Operating Experience.

We wish to acknowledge our appreciation for CNSC staff involvement with stakeholder engagement generally but specifically for the on-going participation in our annual conference (which was not held in 2020 due to COVID-19 concerns) and involvement with CNSC-Industry Working Groups.