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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: 2021**

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**Rapport de surveillance  
réglementaire sur l'utilisation  
des substances nucléaires au  
Canada : 2021**

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Commission Meeting

Réunion de la Commission

November 1<sup>st</sup>, 2022

Le 1<sup>er</sup> novembre 2022

**CRPA-CNSC Working Group  
CRPA WG Member Comments**

**Regulatory Oversight Report on the  
Use of Nuclear Substances in Canada: 2021**



Submitted by:

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16 SEP 2022

# 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 the past few years the 2021 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. The ROR only seems to make it into the Regulatory Oversight Reports section of the web-site once it has been presented to the Commission and finalized, <http://www.cnscc.gc.ca/eng/resources/publications/reports/regulatory-oversight-reports/index.cfm>

Has the CNSC published a "What We Heard Report" with regard to DIS-21-01 Regulatory Oversight Review? The CRPA commented on that Discussion Paper and presumably other stakeholders did as well. It would be more meaningful to review the 2021 ROR on the Safety of Nuclear Substances if there was some indication which way future RORs were going or what stakeholders' perceptions of current RORs were.

A number of the graphs used in the report seem to have little contrast, for example, Figures 2 to 9 seem to be a mix of blues and greens without any higher contrasting lines such as red or yellow (the use of green, yellow and red seems to be reserved for use in Tables 4 to 16 – the high contrast works well and the colors send the main message similar to a traffic light).

## Use of nuclear substances in Canada: 2021

Four metrics are identified as being used in this report. "doses to workers" is shown as the third metric – it has been suggested that "doses to workers" is why we do what we do to protect workers (and the public) – this metric should be given more prominence.

## **1.0 Inspection Overview in 2021**

Human nature being what it is, we are not surprised that CNSC staff see a correlation between a reduced number of inspections and compliance results – bad habits and undesirable shortcuts can creep in when licensees and workers practices are not being scrutinized (and that is one reason that many of us advocate internal inspections).

## **2.0 Inspection Planning Overview**

The explanation for how a licensee is selected for inspection is most appreciated – we don't believe that we have ever seen this previously explained.

## **4.0 Enforcement**

We are told that all but one Enforcement Actions were in the Industrial Sector – with the continued declining trend in the Radiation Protection SCA in the Nuclear Medicine sub-sector, licensees in the Industrial Sector might question why their sector is subject to enforcement actions while the Nuclear Medicine sub-sector is not, especially with regard to the professional training of individuals involved in Nuclear Medicine.

## **Appendix B – Compliance Performance**

The declining trend in the Radiation Protection sub-sector continues to be a concern to us and has been flagged to the Canadian Association of Medical Radiation Technologists (CAMRT) [personal communication to CAMRT Director of Professional Practice 14 SEP]. An upcoming Professional Development course hosted by CRPA on Radiation Detection Efficiencies will be advertised to CAMRT members. Are there any suggestions as to what else the CRPA could do to try to help reverse this concerning trend?

Listing the top 3 common non-compliances is useful for teaching but in cases of declining trends additional non-compliances and information would be useful.

## **Appendix E - Reported events**

While the summary of reported events in Appendix E of the ROR is helpful, 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 past RORs. Root cause and summary of corrective actions are missing. One CRPA member of the CRPA-CNSC WG believes that adding a column to Appendix E that would identify injuries or fatalities would be helpful in a general Workplace Health & Safety context (so maybe there were no radiological implications from an event but maybe significant trauma due to an object falling on a worker for instance).

### **Appendix G - Stakeholder Engagement**

As stated in our comments to the previous RORs, CRPA members continue to find CNSC outreach sessions very worthwhile and CNSC staff presentations and participation, whether in-person or virtual priceless.

The CRPA-CNSC Working Group is not mentioned. A perceived mis-characterization in Appendix G has already been identified to an NSRD staff member [personal communication 15 SEP to NSRDLD Director].

## **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 Transport SCA-focused Working Group meeting.

