

Recommendations for CNSC document RD/GD-338: Security Measures for Sealed Sources

Recommendation	Justification
<p>In Table B, pp. 7-8 are listed requirements for “Perimeter and physical barrier (1st line of defense)”. Section 3.2.5.1.1 gives the requirements for these secure containers. There is a deficiency in this list – please add ‘secure irradiators’ to the list of secure containers. Also please add “securely bolted together” to the section on “Requirements for secure containers”, under the bullet that includes: “fitted with a key or combination lock...”</p>	<p>We use an irradiator that houses a Category 2 ¹³⁷Cs source. This irradiator can only be opened through removing several bolts and through the use of a hoist. This irradiator is significantly more secure than a file cabinet, metal box or wire cage. Removing many bolts on an irradiator such as this one supplies sufficient time to provide delay sufficient to enable response personnel to intervene as required.</p>
<p>Is it within the purview of the CNSC to prescribe personnel background checks? If not, then in Table B, pp. 7-8, delete the row for “Personal trustworthiness or background checks” and all related sections. If this authority can be verified, then change Table B, pp. 7-8, so that current employees in a facility with 5 or more years of experience are grandfathered and not required to obtain a new criminal records name check or reference, education and employment verification. Change section 3.3.4.1, bullets a), b), and c) to reflect this.</p>	<p>If the CNSC is not exceeding its authority with this requirement, then in section 3.3.4.1, for bullets a) and b), grandfather all personnel who have been employed for 5 or more years. That is reasonable, since appropriate checks were carried out during the initial hiring process but the documentation may not be easily retrievable. For bullet c), change to, “... unless the person has been employed for more than 5 years at the facility.” 10 years is arbitrary and unnecessary.</p>