

May 15, 2012

Our file: TU 06374

Mr. François Rinfret
Director (Acting)
Point Lepreau Regulatory Program Division
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario
K1P 5S9

Subject: Comment on CNSC Draft Regulatory Document RD/GD-338 Security Measures for Sealed Sources

Dear Mr. Rinfret:

Following are NBPN's comments on RD/GD-338 in relation to security measures for sealed sources:

- Table B in section 3.1.2 requires some clarification. The Nuclear Security Regulations (NSR) provide stringent security measures that Protected Areas (PA) of high security sites must meet in order to maintain their licence and remain in operation. For storage of Category 2 sources within the NSR PA, please clarify whether the RD/GD-338 requirements for the 1st and 2nd lines of defense are in addition to, or are they met by, the NSR requirements.
- RD/GD-338 was found to be very confusing to follow as it was not clear in many areas. It would appear that most, if not all, requirements are met through the NSRs for nuclear sites however some of the wording in RD/GD-338 seems to contradict that appearance.

If you require further information on this matter, please contact Mr. Ted Doncaster, Security Commander at (506) 659-7484.

Sincerely yours,



Wade J. Parker
Station Director
Point Lepreau Generating Station

WJP/AMM

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