

## Hunt, Jane

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**From:** Jeanne Miller  
**Sent:** Wednesday, March 28, 2012 2:02 PM  
**To:** Consultation  
**Subject:** Comment(s) on 3.3 section of RD/GD-338: Security Measures for Sealed Sources document

Comment: Personal Trustworthiness and Reliability:

I have reviewed the additional documents as referenced from this section relevant to trustworthiness and reliability. It is not clear to me what level of reliability (enhanced reliability/reliability) is required. Furthermore, it is not clear as to what activities or convictions might disqualify an individual. I appreciate that the CNSC prefers to be non-prescriptive in its policies; however, we must develop an internal standard and apply it consistently to avoid discrimination/favoritism allegations in our hiring practices. This process will be complex and expensive, and I do not want to be advised by CNSC Security inspectors after implementing this that it is insufficient or does not meet the intent of the Security Requirements. NRC/ERD will be implementing reliability check requirements for the handling of explosive material; their criteria is much clearer, and I plan on using that for personnel with access to either radioactive material and/or explosives. BATFE and NRC in the US has also established very specific criteria for the screening of personnel with access to this material.

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