

Canadian Nuclear Safety Commission
Regulatory Framework Division
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario, Canada K1P 5S9
consultation@cnsccsn.gc.ca

June 4, 2012

This letter represents a formal response and comments by TISI Canada Inc to the CNSC's Guide document RD/GD-338 Security Measures for Sealed Sources.

After a detailed review of this document the following comments are made:

1. Page 2 (j). Typo. Should be the word "workers".
2. Request a clarification of the CNSC expectation for licensees responsibilities when using courier services. Specifically for category 2 sources, section 4.2.1 page 22 speaks of a verification process. Verifications also include background screening of carrier personnel.

It is a normal and acceptable industry practice for a company to verify client and regulatory compliance of its suppliers and subcontractors. However, in the case of couriers or third party carriers, the end result may be meaningless if these (Couriers/carriers), are not licensed or regulated the same way. It MAY be possible that carriers/couriers may simply choose not to service this industry. It may also prove to be difficult to verify or for the couriers to implement unless they put an id system in place or are willing to spend that extra expense to service our industry.

Our industry would be reluctant to be responsible for sources and devices once out of our control. Security regulations must apply and be consistent throughout the supply chain in order to maintain control of sources and devices. There are already requirements in place for transfer and direct observation of devices and sources. However, transport within and unregulated industry appears to be a weak link in the chain.

If the expectation is for a licensee to simply implement a documented verification process as part of the procurement/purchasing of courier/carrier services, then this would be an acceptable expectation.

3. Request clarification or additional information on the requirements for background checks. It appears that verification of trustworthiness, honesty and reliability can only be made by the use of a background check using the CPIC database. If this remains to be the case, can a company accept a background check that was performed as part of another program or by another company? Provided the CPIC was used for the verification and documented evidence was available (Copies of assessment or background check report)? I;E Nexus, Controlled Goods Program, ITAR, a check performed by another company. The flexibility would allow licensees to mitigate the cost of this requirement if possible. Currently a background check to CPIC can cost up to \$60 U.S per person.

Otherwise we find the guide to include requirements and guidelines that we in our company already have in place for category 2 sources and devices.

Regards



Team Industrial Services
TISI Canada Inc.

Alan Brady
Director. HSE/CHSO
Corporate Radiation Safety Officer
TISI Canada Inc

Phone: (905) 337-4730

Cell: (905) 466-4584

Fax: (905) 845-9551

E-mail: alan.brady@teaminc.com

Web - www.teamindustrialservices.com

Safety First in Everything We Do.