



The Ottawa Hospital | L'Hôpital
d'Ottawa

Radiation Safety & Emergency Preparedness Department
Committed to a Quality Radiation Safety Program

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January 20, 2015

Canadian Nuclear Safety Commission
280 Slater Street, P.O Box 1046, Stn B
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Mister, Madam:

I would like to take this opportunity to acknowledge the initiative of the CNSC on making an important role in the selection and development of the regulatory framework and regulatory program.

The Ottawa Hospital is please to provide comments on Discussion paper DIS-14-02, modernizing the CNSC's Regulation. Please see the attached table for our comments to the six questions

Should you have any questions we would be happy to elaborate on the above observations.

Yours truly,

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Modernizing the CNSC's Regulations

Comments by The Ottawa Hospital, Jan 20 2015

Number	Question	Comments
1	<p>Could the CNSC's regulations be changed to make them more efficient and effective in ensuring protection of the health, safety, security and the environment? How?</p>	<p>Need more clarification on NEW vs non-NEW and Lens of the eye limit dose. The EQs do not seem to be connected with health effects (like ALI), spills on a person (which must be reported for any quantities), possession, disposal, export, etc. We think it is a subject that should be discussed.</p>
2	<p>Is the CNSC striking the right balance between performance-based regulation and prescriptive requirements? Are there specific regulatory requirements that do not seem to have the correct approach?</p>	<p>The combination of prescriptive and performance-based works well, but it depends on an open relationship with CNSC licensing officers, so that criteria or programs can be discussed. Often problem arise when due to the variation inherent to the inspection process, mis-alignment between inspectors and license officers expectations and interpretation.</p>
3	<p>Are you aware of opportunities for the CNSC to reduce administrative burden, without compromising safety?</p>	<p>*Reducing administrative burden is a good thing. However, the most important goal is to have an effective regulatory system. Some licensees complain about regulations, but most recognize that a robust regulatory regime consistent with internationally accepted standards benefits the sector by providing consistency, stability and limitation of liability. Reducing administrative burden is a secondary goal. To be able to submit the Annual report on line.</p> <ul style="list-style-type: none"> • Proposed method of dose assessment for non-NEW workers. Individually? Task or job specific estimate? • Clarification re: would we have to have workers who are involved in facility but not NEW's sign their own declaration? <p>Make administrative tasks like the ACR align better with other objectives, like compliance enforcement. For example, why not make some items from the desktop assessment (such as a waste disposed down the sewer) part of the ACR? The evidence demonstrates that the heavy administrative burden on research licences being in the past incommensurate with the risk has lead researchers to look and find alternative techniques to using radioactive material.</p>
4	<p>Is the CNSC making effective use of existing standards? Are there additional opportunities for the CNSC to reference standards in its regulations?</p>	<p>CNSC can try to reference the latest standard in their regulation. The CNSC does a good job in incorporating many standards into their regulations. An area of concern is ensuring that the most recent standard is referenced. There is definitely an opportunity to further incorporate industry standards, such as CSA, particularly in the area of designs of new radiation areas,</p>

5	<p>Is the relationship between CNSC regulations and the obligations set forth in licences clear and straightforward? Would it be clearer to prescribe some standard licence conditions in regulations rather than in licences? If so, which ones?</p>	<p>it would be clearer to prescribe some standard licence conditions in regulations rather than in licences. Such as decommissioning Criteria Some things are better as licence conditions. For example, the proposed requirement to make NEWs declare if they are breast feeding. This makes no sense for facilities where only sealed sources are used, like the majority of radiation therapy centres. It represents an intrusion into a mother's personal choices, and does absolutely nothing to enhance the safety of mother or baby. This could be a licence condition where the activities warrant it, but should be left off licences where no unsealed sources are used.</p>
6	<p>Are there opportunities where the CNSC can provide greater assistance to applicants and licensees understand what they must do to comply with the CNSC's regulatory requirements?</p>	<p>Yes, there are certainly opportunities where the CNSC can provide greater assistance for licensees to understand the requirements. In my experience, certain divisions already do a fantastic job of this (Class II). Investing in quality CNSC staff that keep the lines of communication open is the best opportunity for the CNSC to provide greater assistance to licensees and ensuring a safe environment for all. The Class II division does a good job of helping licensees to understand requirements. Having a presence at conferences and workshops, contributing to newsletters, and generally having a collegial relationship with licensees is very helpful.</p>