

Belyea, Sean

From: Consultation
Sent: Wednesday, March 11, 2015 8:01 AM
To: Belyea, Sean
Subject: FW: Feedback on DIS-15-01

From: Corie Doyle [<mailto:CDoyle@slb.com>]

Sent: Tuesday, March 10, 2015 4:18 PM

To: Consultation

Subject: Feedback on DIS-15-01

Please accept this feedback on DIS-15-01: Proposal to Amend the Nuclear Non-Proliferation Import and Export Control Regulations.

Response to Section 4 of DIS-15-01:

- How many employees in your business would be subject to a change in administrative activities resulting from this proposal? What are the generic position titles of those employees? (e.g. technician, manager, clerk, etc.)

Schlumberger Canada Limited and Schlumberger Technology Corporation in the USA together have a team of approximately six (6) people who are routinely involved in the organizing the import of nuclear grade graphite on a shipment-by-shipment basis. Maintaining compliance with this particular regulatory requirement is not their full time occupation.

- How many hours would it take those employees to perform any new administrative tasks over a 1-year period?

The team spends approximately 8 hours per year per person working on this administration of this regulatory requirement.

- How many hours would be saved through licensing exemptions or clarifications?

All of the hours noted above would be saved if this regulatory requirement was removed.

- Do you have any suggestions on how these costs could be reduced, while continuing to fulfil the objective of the proposal and without compromising safety?

Since the proposed regulation provides an exemption to the current requirement, these costs would be entirely eliminated and there would be no compromise to safety.

Additional Comments:

The most important change to our organization is the proposed clarification of Nuclear Grade Graphite in the Schedule. The clarification of entry A.1.4 to be only applicable to nuclear grade graphite for use in a nuclear reactor will reduce Schlumberger Canada Limited's administrative burden due to the elimination of time to prepare an annual report and maintenance of information over the year to be able to assemble the annual report and subsequent licence renewals.

There is, however, a lack of clarity in the time period associated with the 1kg limit in the proposed wording of the schedule. A definition of annually, over the licence term, or per shipment/import would make this requirement more clear.

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