



September 12, 2016

Canadian Nuclear Safety Commission  
P.O. Box 1046, Station B  
280 Slater Street  
Ottawa, Ontario K1P 5S9

**Re: Nordion Comments on Discussion Paper DIS-16-03**

Nordion is pleased with the opportunity to comment on the CNSC's proposal to improve the regulatory framework for radioactive waste management and decommissioning. We have reviewed CNSC's proposal and have a number of comments and suggestions which we have attached to this letter.

We look forward to further discussion with the CNSC on this proposal.

Sincerely,

Richard Wassenaar  
Sr. Manager, Transport Licensing and Gamma Radiation Safety

# Nordion's Comments on DIS-16-03

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Nordion has reviewed DIS-16-03 and has a number of comments and suggestions. We have formatted our comments and suggestions based on the DIS-16-03 section headings.

## Section 1, Introduction

Page 3, last paragraph. "The CNSC is committed to minimizing and avoiding the creation of new requirements as a result of this process. Rather ..."

It is not clear to Nordion the need to further clarify and codifying CNSC's expectations. The current regulatory framework seems sufficient. Of particular concern is the potential to introduce new requirements. Although the CNSC has committed to minimizing new requirements, the addition of any new requirements would result in an increased financial and resource burden on industry to assess and implement the new requirements, and it is not clear that there would be an increase in safety to the public or the environment.

### Section 2.1.1

The CNSC seems to be proposing prescriptive definitions for waste categorizations based on CSA N292.0-14. However, N292.0-14 does not prescribe waste categorizations, but rather provides guidance in Appendix A of the CSA standard. As the CNSC is looking to formally adopt the CSA standard in its new RegDoc, then the categories should be defined by the licences, based on the guidance provided in the CSA standard.

Setting prescriptive definitions for waste categorizations would be burdensome for licensees. The current guidance categories provide an amount of overlap between the various categories. This allows for licensee to define waste, and the associated waste streams and actions required, in a manner that optimized waste management for their specific operations.

### Section 2.1.2

We don't believe there is a requirement for the CNSC to clarify other types of waste streams. Conventional hazardous and non-hazardous waste is covered under a number of other municipal, provincial, and federal regulations.

## Section 2.2

Nordion considers reduce, reuse, and recycle an important concept in our waste management program. However, we are concerned with how reduce, reuse and recycle could be implemented as a requirement in the new documentation. Radioactive material is unlike other conventional material that can be easily reused or recycled. Such reuse and recycling streams may not be possible or feasible for radioactive material. In addition, reduction of radioactive waste is already an operational principle due to the cost of disposal of radioactive waste verses conventional waste. Prescribing a reduce, reuse, and recycling program would have a significant impact to industry.

It is not possible to determine the potential cost associated with such a new requirement without first knowing how the CNSC proposes to implement it. In general, Nordion has implemented a number of

operational procedures related to our waste management program. Any new regulations that would require a change to our current operational procedures and practices represents a significant cost and timing for implementation.

## **Section 2.3**

Nordion agrees that defining the minimum record retention time would be useful. Such timelines should be based on the type of waste (i.e. short-lived low-level vs long-lived high level waste). As well, once waste has been removed from a facility, waste records would be effectively transferred to the next licensee that accepts the waste. As such, there is less need for the initial waste producer to keep records for any significant length of time, particularly after a license has expired.

The maintaining of records can be expensive and cumbersome. It is important that record retention periods are not indefinite, but are based on the type of waste and whether such waste remains on site or has decayed to exemption or release levels.

In this section, and in the discussion paper in general, “disposal facility” is not defined. Is it important for the CNSC to define disposal facility.

## **Section 2.4.1, 2.4.2, and 2.4.3**

Nordion is of the opinion that current CNSC regulations account for various types of waste operations. It is important that “waste licensees” are not separated from current Class I licenses. Nordion’s Class 1B license incorporates waste management. In addition, a number of hospitals and research centre would also have waste management programs within their current licenses, outside the Class 1B license framework.

Separating “waste licensing” activities from general facility licenses would be burdensome to licensee and expensive to implement. Any classification of waste facilities must take into account the fact that many waste facilities also undertake other CNSC licensed activities and waste generation is a part of these activities.

## **Section 2.5**

Nordion is currently implementing an effective waste management program. However, any implementation of new regulations, such as the formalization or requirement to adhere to CSA N292.0-14, would result in significant compliance and administrative costs as the implementation of new requirements or standards would require various gap analysis and procedural reviews to ensure the new requirements were being met. It is our experience that any new requirements, even ones where industry is already effectively implementing such requirements, results in changes to our operational policies and procedures. This is a both an administrative and financial cost to our organization for what is typically of little benefit to the safety of the public or the environment.

## **Section 2.6**

Nordion has no comments on this particular section.

## Section 2.7

Currently, once a facility has undergone decommissioning activities and can be released from CNSC regulatory oversight, the license is revoked. Nordion wonders whether there is any benefit to also issuing a completion certificate once such activities are completed. This would provide a means for previous licensees to show that, although they were once under regulatory oversight, all conditions for release have been met and are no longer under regulatory control.