

From:
To: [Consultation \(CNSC/CCSN\)](#)
Subject: The Canadian Nuclear Safety Commission invites your comments on REGDOC 2.7.3, Radiation Protection Guidelines for the Handling of Decedents
Date: November-02-17 2:44:19 PM
Attachments:

Hi there, Below are some general feedback comments for the consultation regarding the Radiation Protection Guidelines for Handling Decedents.

- This is a useful document and will be helpful for public health to consult when we get questions about these issues, and for developing policy.
- It would be helpful to have an idea of the prevalence of therapeutic procedures, or treatments that use nuclear substances when considering risk. (e.g. 1 in how many bodies, or even just numbers of population)
- It would be helpful to get a better understanding of the chances that a funeral home worker would be aware of this issue, and if a body in their care has had a procedure. Would they only know if a family member thought to tell them, or is this a question that funeral service workers might/should ask a family? Should this type of querying be recommended to the funeral service industry? Is a card always issued for every treatment mentioned in the document? Who/what legislation requires this?
- In AB there does not appear to be a mechanism in place for physicians to relay this treatment information to funeral homes in a consistent manner. Funeral homes report not getting this information when they take custody of a body.
- The PPE sections are fairly short and vague. More specifics on types of PPE recommended, who should wear it (anyone nearby or just those directly performing the procedure) would be great.
- The document mentions inclusivity to public risks several times, yet is quite specific in its recommendations throughout to specific procedures (embalming, cremation) that would only be performed by professionals. Risks, potential exposures and recommendations for the general public that might be viewing, performing non-invasive body preparations, etc., could be more explicit.
- For communicable disease risks associated with handling bodies, we have taken a “routine practices” approach for taking precautions such as cleaning and disinfection and wearing PPE when handling all bodies. This approach assumes that all bodies may have a communicable disease, so routine practices are used to protect those who are handling the body and are at risk of exposure. Additional precautions beyond routine are used for a list of specified diseases, and specific labelling of the body is only required for these specified diseases in order to alert those who may handle the body of the additional required precautions. Could there be a routine practices approach added to the document for radiological risks that would appropriately address most risks as well? Maybe this would

simplify the precautions sections regardless of the nuclear substance used, or the treatment procedure. This would also help in addressing the issue of funeral home workers not always getting the information about past treatments when they take custody of a body.

Regards,