



## Ontario Association of Medical Physicists

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

RE: Draft Document Radiation Protection Guidelines for Safe Handling of Decedents  
(REGDOC-2.7.3)

The Ontario Association of Medical Physicists (OAMP) has reviewed the draft *Radiation Protection Guidelines for Safe Handling of Decedents* document and would like to offer the following comments and recommendations for consideration by the CNSC:

- 1) Document Scope – While the CNSC has limited the scope of this document to only cover cremation of decedents with radioactive implants, we feel the scope should be expanded as follows:
  - a. There are many radioisotopes used in diagnostic and therapeutic nuclear medicine procedures, including, but not limited to, Technetium-99, Thallium-201, Lutetium-177. There are often concerns raised within hospitals and funeral homes for patients that have expired in a relatively short time after having a nuclear medicine procedure. We feel guidance in this regard is warranted. Having a web-based list of radioisotopes and recommendations may help the CNSC in implementation of this request.
  - b. Although the CNSC provides guidance for the autopsy and embalming processes, it does not include recommendations around decedents who are to be entombed.
- 2) The CNSC should consider providing a table of time factors such that the level of activity injected into a patient is considered. For example some patients receive I-131 with an activity of 150 mCi whereas others receive 30 mCi. The draft document recommends waiting 2 months for both patient groups.
- 3) Radium-223 is a relatively new isotope being used routinely to treat painful bony metastases in patients with prostate and breast cancer. The physiological pathway for Radium-223 is very similar to Strontium-89. As such, Radium-223 will be present in the bones and in the cremated remains and should be handled in the same way as Strontium-89 in terms of the recommendations under section 6.1.
- 4) As indicted in Section 1.2 and Appendix B of the document, there is Ontario legislation that also deals with the subject matter of REGDOC-2.7.3. The OAMP is concerned with how these recommendations will affect and/or be incorporated into the Ontario *Funeral, Burial and Cremation Services Act*. The OAMP will be contacting the Ontario Ministry of Consumer and Business Services, the Ontario Funeral Service Association and the Ontario Association of Cemetery and Funeral Professionals in an effort to disseminate the draft recommendations and determine next steps.

The OAMP wishes to thank the CNSC for the opportunity to comment on this important set of recommendations. If there are any comments or concerns regarding the recommendations, please do not hesitate to contact Jeff Richer ([jeffrey.richer@wrh.on.ca](mailto:jeffrey.richer@wrh.on.ca)).

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