



**nordion**  
SCIENCE ADVANCING HEALTH

January 31, 2017

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

**Subject: Nordion Comments on Discussion Paper REGDOC-2.1.2, "Safety Culture"**

Dear Sir or Madam,

We are providing comments from Nordion on the CNSC Discussion Paper REGDOC-2.1.2, "Safety Culture" issued for comments by the CNSC September, 2016.

Nordion believes that safety culture is extremely important however as presented in REGDOC-2.1.2, "Safety Culture" it is required to be a standalone program. Currently Nordion addresses many of these requirements as part of our existing radiation safety and conventional health and safety programs. It is Nordion's position that the formal implementation of a safety culture program would be an unnecessary administrative burden requiring considerable cost and effort, with little or no additional safety benefits.

In addition, the following points are also noted with regards to REGDOC-2.1.2 "Safety Culture":

- 1) It is felt that this document does not clearly describe how this would apply to Class IB facilities;
- 2) The requirement to conduct safety culture assessments at least every three years seems unnecessarily onerous;
- 3) It is Nordion's position that results of safety culture assessments should not be required to be shared with external stakeholders;
- 4) The requirement "A safety culture assessment is generally a hybrid of these two types, using a blended team of independent contractors and workers who represent all areas of the organization" suggests that external contractors be used to comply with the requirements of this program. In many of the recent requirements from the CNSC there has been a tendency to require the use external contractors which has a significant financial burden to licensees.

Should you have any questions or require additional information, please do not hesitate to contact me at (613)592-3400 extension 2737, or e-mail at [jennifer.mahoney@nordion.com](mailto:jennifer.mahoney@nordion.com).

Sincerely,

Jennifer Mahoney  
Manager, Environment, Health & Safety (EHS) & Documents & Corporate Records  
Nordion