

Canadian Nuclear Safety Commission
Regulatory Framework Division
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Re: Comments on Proposed Draft REGDOC 2.5.5 Physical Design or Industrial Radiography Facilities

Overall the format needs improvement. We suggest that the REGDOC is compared to the layout for example, of REGDOC 2.12.3 for Security. The sections need to be organized to provide clarity of information and details in an orderly fashion. The guide would also benefit from a review of the language and grammar used throughout the document.

The main comment we would like to make is that temporary structures should be removed from the scope of this document. Or, that the expectations for temporary structures are clearly defined. We need to assure that requirements for temporary installations are not as prescribed or regulated as far a design. Especially when the main purpose is to simply provide extra shielding on an as needed, temporary basis, and that the general, security and RPR regulation requirements are already being applied.

Regards



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