



Interior Health

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

Via E-mail

19 SEP 2018

Dear Sir/Madame:

RE : Comments on Draft REGDOC-3.1.3 Reporting Requirements for Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices

Thank you for the opportunity to comment on Draft REGDOC-3.1.3 Reporting Requirements for Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices.

1. Page 10 Guidance: This includes non-compliances found during internal audits.
 - I strongly believe this requirement will reduce the effectiveness of internal audits. Currently they are a useful tool for the education of staff and the assessment of the effectiveness of the program. This change could and likely will lead to a more adversarial relationship between front line staff and radiation safety officers. Though I certainly understand the rationale behind this request I feel it will not lead to any greater radiation safety and may in fact lead to less effective radiation safety programs. I would like to see this revised to include a category of non-compliances that must be reported (ie if non-compliance related to x,y and z found during internal audits) rather than the broad statement of any non-compliance. That way if a true non-compliance is found that is significant it will be reported but a minor paperwork issue with no real significance is not. Alternative this should be deleted if not revised.
2. Page 27 Guidance: wrong patient (without any requisition) injected with or exposed to a nuclear substance
 - This is an interesting guidance piece that has likely not been reported in the past. CNSC has not generally been concerned with medical errors of this nature though I can see the interpretation of this as an overexposure. I do however feel a couple of items require clarification
 - The statement “(without any requisition)” is a strange statement. If the person is a patient there will likely be a requisition of some kind for something (ie other medical imaging procedure, lab exam etc etc) it is unclear to me what requisition this refers to.

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- If the person referred to in this guidance is truly a patient(as described by the guidance) of the nuclear medicine department or any other area of medical imaging that utilizes ionizing radiation than the section of the radiation protection regulations indicated by this guidance is not applicable. Patients do not have dose limits as described in the radiation protection regulations. In my opinion this would create a grey area between medical errors and radiation safety which is not beneficial. If the interpretation used here was applied to the rest of the RPRs it would create a maelstrom relating to appropriate dosage etc. I feel this guidance requires specific clarification or further justification.
3. Page 33 Guidance: exposure devices, radiation devices or nuclear substances left unattended
- This guidance is not clear. There are many times per day that nuclear substances are left unattended in a nuclear medicine department. That does not mean they are any less secure. They may be unattended but behind locked doors or other similar security measures. I don't think this description adequately describes the lack of control the author is intending to indicate here.

Thank you,

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