

24-Feb-2017

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

Re: Feedback on Proposed Implementation of REGDOC-1.4.1 Licence Application Guide: Class II Nuclear Facilities and Prescribed Equipment

To whom it may concern:

Thank-you for the opportunity to comment on this proposed implementation.

The following feedback is given in our capacity as radiation safety officers (RSOs) for publicly funded, not-for-profit, Class II medical facilities providing treatment to cancer patients.

Information Previously Submitted to CNSC (pages 6, 7)

There are sections of the guide (pages 6, 7) that mention required information that has been previously submitted to CNSC. The wording of these sections indicates that applicants can reference these documents rather than submitting them again as long as they were “previously submitted to the CNSC as part of a licence application”. This wording does not address information previously submitted to CNSC separate from a licence application. An example of this would be a licensee applying for a licence renewal who references a recently updated version of the Radiation Safety Manual that has been accepted by CNSC and has a CNSC document number. In this case it is not clear if CNSC requires a re-submission of the unchanged Radiation Safety Manual with the licence renewal.

Table 2: Required application sections by facility type and licensing phase (page 7)

- (1) In Table 2 and in Appendix D (page 72) the acronym “IPA” is used but the acronym is not defined anywhere in the guide. Recommend a definition be added.
- (2) In Table 2 the term “Fixed facility” is used several times but this terminology is not explicitly explained. Recommend adding an explanation of what “Fixed facility” refers to. This could be added to Table 1 on page 4 if Table 1 is then referenced in Table 2.
- (3) In Table 2 recommend adding rows that indicate the required sections for licence renewals.

PART G: Licence renewal

This section of the guide requires the licensee to provide a large amount of information that has previously been submitted to CNSC as part of mandatory licence Annual Compliance Reports. This information includes:

- (1) Annual dosimetry results for monitored workers for the previous 5 years.
- (2) Sealed sources acquired, transferred, or disposed of during the previous licensing period.
- (3) Servicing operations during the previous licensing period.

Given that all licensees must submit ACRs on an annual basis, this requirement does not seem reasonable.

Appendix G: Monitoring for Radioactive Contamination

In the section titled “Instrument checks” it is stated that instrument efficiency should be checked using a standard check source for every set of contamination monitoring measurements. This recommendation is not reasonable for certain heavily-used contamination meters that do not contain integrated check sources. The Ludlum 44-9 pancake probe for instance is a very popular contamination meter that does not have an integrated check source. The financial cost of purchasing (as well as the logistics in managing) check sources for each and every contamination meter in the BC Cancer Agency Functional Imaging Department would be prohibitive. Sharing of check sources between meters would increase the risk of spread of contamination as users walk through the department to access a communal check source. We recommend changing the wording to recommend checking instrument efficiency using a standard check source on a regular or frequent basis as opposed to for every set of measurements.

The section titled “Instrument checks” also is not clear with regards to mandatory requirements and recommendations. For instance it is stated that “... all instruments should be given operational checks ...” and in the next sentence that “Licensees must keep a record of the operational checks ...”. We recommend clarifying the mandatory requirements for contamination meter instrument checks.

Licence Application Form Section A.2.3 Principal location of use or storage or both – prescribed equipment

This section of the application form requires submission of proof of ownership of the site or authorization to construct and operate a nuclear facility. For licence renewals of publically funded, not-for-profit facilities that have been licensed for many years previously this information may not be readily available. Procuring up-to-date legal documents to satisfy this requirement may cost the licensee considerable funds in legal and/or municipal fees. Recommend specifically stating that this information is not required for licence renewals for publically funded, not-for-profit facilities.

Thank-you again for the outreach concerning this proposed implementation and for the opportunity to comment.

Yours sincerely,

M. Peter Petric
Provincial RSO
BC Cancer Agency – Vancouver Cancer Centre

Sheila MacMahon,
Regional RSO
BC Cancer Agency – Vancouver Cancer Centre

Wayne Beckham
Regional RSO
BC Cancer Agency – Vancouver Island Centre

Greg Paliouras
Regional RSO
BC Cancer Agency – Cancer Research Centre

Robert Corns
Regional RSO
BC Cancer Agency – Fraser Valley Cancer Centre

Ramani Ramaseshan
Regional RSO
BC Cancer Agency – Abbotsford Cancer Centre

Derek Hyde
Regional RSO
BC Cancer Agency – Centre for the Southern Interior

Narinder Sidhu
Regional RSO
BC Cancer Agency – Centre for the North