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6 March, 2017

The Canadian Nuclear Safety Commission
c/o Ms. Louise Levert
Secretariat, Canadian Nuclear Safety Commission
280 Slater St., P.O. Box 1046
Ottawa, Ontario K1P 5S9

Re: *The Draft* REGDOC-1.4.1, Licence Application Guide

Dear Ms. Levert:

We are writing to you on behalf of the Canadian Organization of Medical Physicists (COMP) to comment on the draft REGDOC-1.4.1, Class II Nuclear Facilities and Prescribed Equipment Licence Application Guide which the Canadian Nuclear Safety Commission (CNSC) opened for comment in October 2016. We trust that this letter will provide the CNSC with some points to consider as the Commission continues to develop the Class II Licence Application Guide.

To provide some context: we the undersigned are all members of the COMP-CNSC Liaison Subcommittee of COMP's Quality Assurance and Radiation Safety Advisory Committee (QARSAC). We have all worked with CNSC staff over the years to ensure safe radiation environments for patients and the public in our CNSC Class II licenced facilities, typically by serving as Radiation Safety Officers (RSOs). Relevant to this commentary, all the undersigned have been involved with the preparation and submission of a full spectrum of licences (including consolidated licences) for our institutions.

REGDOC-1.4.1 presents a comprehensive review of the requirements and steps for licence applications to the Class II division. We understand that it represents a considerable amount of work by CNSC staff over a number of years, and thank the authors for their efforts to improve the application processes for licensees.

The initial impression from many of us was that the REGDOC was somewhat overwhelming and might be a difficult resource to use, since it is very comprehensive, with details not all users would require. However, a number of us have reviewed it in use parallel with the on-line pdf application form, and have found it to be helpful.

Still, it does seem to be the product of many hands, and we believe that it could use further revision. Our understanding is that this is also recognised by the CNSC. We will cite here just a few points to consider. This is not a complete list, since we understand CNSC staff have already identified a number of points for improvement and so the document is likely changing. But we trust this list representing some points for possible improvement might provide some guidance to CNSC staff.

Some comments:

- 1) As noted above the document is very big covering a number of different licence applications and general processes for submission. But the breakdown of the sections is not always clear. And some sections start in the middle or the end of pages, so it is not readily apparent when topics or themes have changed. Perhaps the authors could consider an improved breakdown of sections so that readers can more easily find the particular content for their application.
- 2) The Guide mentions the term "Consolidated Licence" three times. But there is no definition given, no explanation of the value of a consolidated licence, nor a process defined that would guide one on how to consolidate the licences for one's facility. Given that the development of the consolidated licence in the last years has greatly simplified work for both licensees and CNSC staff, we recommend some information be provided on this topic.
- 3) On pages 1 and 2 the Guide restates some statutory provisions. For example, Point 4 mentions sections of other documents which list additional information required when applying for a licence. But it is not clear if the information in these provisions is also given in this REGDOC or if one needs to go to these other sources to find all that is needed. Perhaps the relationship between the requirements of the provisions and the information contained in the Guide could be made clearer.
- 4) In section 2.1.2 on the submission of an application, the Guide notes that security information must be encrypted if emailed. Does that mean that the CNSC is now accepting encrypted email submissions? And is the encryption required specified anywhere?
- 5) While Table 2 is helpful in summarizing components of an application, the table in Appendix D is less so. For example, it is neither obvious, nor explained, that the number in each cell refers to the notes section at the bottom of the table (this was only made clear when one of us asked our licencing officer). Perhaps this table can be better explained.
- 6) Some of the requirements seem more prescriptive than current practice. For example, in Posting D.2.7 it states that a copy of the licence must be posted at the site of the posted activity. We have for a number of years been required to only post information directing staff to a place they can find the licence. Has the requirement changed?
- 7) Appendix I gives source categories. For example a typical clinical HDR Ir-192 source is Category 2. However there is an obscure section in RegDoc 2.12.3, Table C, pg 33 whereby HDR brachy becomes a Security level 2, regardless of source activity. This seems to over-ride the Category Table in RegDoc 1.4.1. There seems to be some incoherence.
- 8) RegDoc 1.4.1 provides solid advice on linac disposal in Table J. However, based on some of our recent experience decommissioning multiple linacs, these specified wait times seem to be too long, and it is not obvious what scientific basis was used to determine these values. Also, the table should be generic, and not vendor based.
- 9) Finally, we have been told that the REGDOC was not intended to be used alone, but that it was meant to be used as a resource when preparing the electronic licence application that was developed in parallel. And the application shows clear annotations that appear when a cell is mouse clicked that summarize briefly requirements specified in the Guide. Would it be possible to make available a pdf version of the application with all the annotations indicated? This would enable, for example, a copy to be printed before an application is started so to help the licensee prepare the material they would need on hand when entering data into the electronic form.

We hope this short list provides some indication of points CNSC staff can consider in their future revisions. We believe this REGDOC has very good potential and can potentially make future licence applications easier.

We will close by offering our assistance in the further development of REGDOC-1.4.1, perhaps beta testing components as they are revised. If you have any additional questions or comment please feel free to contact John Schreiner at john.schreiner@krcc.on.ca to initiate discussion.

Sincerely,



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