

March 7, 2017

From the Desk of  
L. John Schreiner

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: Draft REGDOC-1.4.1, Licence Application Guide

Dear Ms. Levert:

We are writing to you 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 hope this letter helps CNSC staff by providing some points to consider as they continue to develop the Class II Licence Application Guide.

To provide some context; we the undersigned are all members of a Community of Practice (CoP) of Radiation Safety Officers that work in cancer centres in Ontario. Cancer Care Ontario supported the establishment of this Community of Practice to provide cancer program RSOs a venue to exchange ideas, to establish consistent practice and to help share expertise. We have been active together for about 2 years. All members of the RSO CoP have worked with the CNSC Class II division over the years to ensure safe radiation environments in our cancer programs. Some members are also NSRD RSOs for host hospitals. Relevant to this commentary, the majority of the undersigned have been involved with the preparation and submission of Class II licences (including consolidated licences) for our centres. We will state here that this letter in no way represents an organizational view from Cancer Care Ontario. It is a letter from a community of individuals who have some expertise and interest in the REGDOC.

REGDOC-1.4.1 compiles a comprehensive collection of the requirements and steps for licence applications to the Class II division. We appreciate that it represents a considerable amount of work by CNSC staff over a number of years; the effort must have been substantial.

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. Having said that, we do have a generally favourable impression that the establishment of an overarching Guide could be useful.

REGDOC-1.4.1 is obviously the product of multiple authors, and we believe that it could use further revision. Our understanding is that this is also recognised by the CNSC. We will cite here a few points that indicated to us that the Guide is not yet mature. This is not a comprehensive list of all points we could have identified, but indicates some of the types of revisions we believe will be required as the Guide is finalised. We hope the list provides some guidance to CNSC staff in their revisions:

- 1) REGDOC-1.4.1 does not address that licences can be Consolidated. Although the term consolidated licence is used three times in the Guide it is not defined, and no information is provided to show how one would consolidate their institution's licences. We feel this is an oversight; consolidated licences have greatly simplified our licencing efforts, reducing duplication of work for both cancer centre RSOs and also CNSC staff. The Guide should direct RSOs on how to implement this option.

- 2) Some of us feel that the Guide is weighty with too much information that is not always aligned or consistent through the whole document. Perhaps the Guide could be divided into chapters arranged along facility type rather than by the sections of the various applications. This might help readers focus on information relevant to their setting, avoiding details that are not applicable.
- 3) It is not always clear how the Guide is to be interpreted as sections go from the General case to specifics. For example:
  - a. B.1.3 and B.1.3.1 – Which of the sections is to be used when filling a specific application? There seem to be some expectations set in the General Section B.1.3, but are we to only use the medical Section (B.1.3.1) for our applications? It is not completely clear.

Also, when defining the breakdown of contributions to workload, the Guide does not seem to include additional defining factors (e.g., IMRT factor, extended SSD or stereo techniques) that would be useful. There is no guidance on how these factors are to be inserted into the application.
  - b. Similarly in B.1.5 and B.1.5.1 – these sections seem to differ in detail, which is applicable when? This could be more clearly presented.
- 4) The Guide does not always give all information. For example, in B.2.3 reference is made to the exemption requirements of section 15(14) of the Class II Nuclear Facilities and Prescribed Equipment Regulations. Could these not be stated in the Guide?
- 5) The Guide does not always seem to be up to date on requirements that have changed in the recent past. For example, B.2.5 specifies the requirement for an independent dose monitor (aka prime alert) on Medical Linacs. But this requirement has been removed by the CNSC. The Guide should make it clear that a monitor is not required for Medical linacs.
- 6) In some areas the Guide is much more prescriptive than past application guides, for example:
  - a. In Section D.1.3, the Guide on the radiation safety management structure is very specific and quite prescriptive. There are descriptions requested (e.g., showing 'encouragement of a questioning attitude') that are considerably more detailed than is in many of our current radiation safety manuals and policies. Is there a minimum requirement that we must adhere to, and should this not be defined?
  - b. In Section D.3.2.1, which specifies the operational procedure training/content, the details seem new; some were not explicit license requirements in the past. It seems that the Guide may not be just compiling the expectations from previous guides; it seems to be also adding expectations.
- 7) It is not clear how the specifics of the Guide will be enforced and interpreted by CNSC staff. While neither the regulations nor the safety act have changed, when comparing our current programs against this Guide it seems that we may well have to change our manuals, policies, and practices to be compliant. We can appreciate that our programs need to stay fresh and well reviewed, and that some improvements will happen regularly with time. But it also seems that programs that have long been compliant with the regulations may suddenly need to change to adhere to the Guide. This would generate considerable effort in the community.

In conclusion, we appreciate that CNSC staff are working to strengthen the CNSC licence application process throughout the Class II setting by establishing a consistent Guide spanning multiple programs in different settings. We believe this REGDOC has very good potential and can potentially make future licence applications easier. But the current form is definitely a draft that should not be rushed into final form. We encourage the CNSC to work with colleagues in the field,

including our group, as the Guide is further developed. Perhaps this might even involve field testing specific sections as applications are processed in the next year or so. If you have any additional questions or comment please feel free to contact John Schreiner at [john.schreiner@krcc.on.ca](mailto:john.schreiner@krcc.on.ca) who is helping to coordinate our response.

Sincerely,



L. John Schreiner  
Kingston, ON



Katharina Sixel  
Oshawa, ON



Peter McGhee  
Thunder Bay, ON



Keith Nakonechny  
Barrie, ON



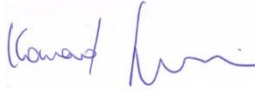
Ivan Yeung,  
Newmarket, ON



Lesley Buckley  
Ottawa, ON



Raxa Sankreacha  
Mississauga, ON



Konrad Leszczynski  
Sudbury, ON



Ernest Osei  
Kitchener, ON



Robert Heaton  
Toronto, ON



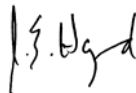
Ranjini Tolakanahalli  
St. Catharines, ON



Geordi Pang  
Toronto, ON



Jeff Konieczny  
Sault Ste. Marie, ON



Joseph E. Hayward  
Hamilton, ON