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To: [Consultation \(CNSC/CCSN\)](#)
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Subject: Comments on REGDOC-1.4.1 License Application Guide
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Here are a few comments on the draft Class II License Application Guide:

1. Section 2.2 “Amending a license”: it would be very helpful if this section provided more detail on when CNSC require licensees to file an application for an amendment. Our assumption has been that we need not inform CNSC of each and every change to a document previously-submitted/cited in the license, but that if we planned a change to remove (or weaken) a radiation safety commitment, we would then need advance permission from CNSC. But it would obviously be helpful to licensees if this section provided more explicit guidance. It would also be extremely helpful to existing licensees if this section provided information on what we should expect when we request a license amendment. Our current CNSC license for Class II equipment service was renewed in early 2014 and the documentation submitted at that time was not required to address all of the topics and details that REGDOC-1.4.1 is proposing as required from future applicants. When we submit an amendment request, should we expect that we will be required to submit all the documentation REGDOC-1.4.1 specifies, even when those additional documents aren’t related to the amendment request?
2. The last row of Table 2 is for “Service by Third Party”. We assume this means service by either the manufacturer of the Class II Equipment OR by a third party service provider?
3. For “Service by Third Party”, Table 2 indicates that Section A2, “Licensed activities and locations” is required. But that section doesn’t appear on the new application form for service.
4. For “Service by Third Party”, Table 2 indicates that Section D5, “Security” is required. But that section doesn’t appear on the new application form for service.
5. In Section A.3.1 of the new application form for service, the dropdown medical accelerator model list is incomplete; several currently approved Varian models are missing.

Thanks for the opportunity to comment,

Elsa

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