



DRAFT
REGULATORY
GUIDE

**CNSC Type I Inspections of Activities and
Devices for Nuclear Substances and
Radiation Device Licensees
Group 3.2 Licensees**

G-302-3.2

(Use Types: 812, 831, 842, 843, 853, 854, 874, 909, 939)

July 2004

REGULATORY DOCUMENTS

The legal framework within which the Canadian Nuclear Safety Commission (CNSC) operates includes the *Nuclear Safety and Control Act (Act)*, its Regulations and other legal instruments such as licences, certificates and orders. The legal framework is supported by regulatory documents issued by the CNSC, the main classes of which are:

Regulatory Policy (P): a document that describes the philosophy, principles or fundamental factors that underlie the CNSC's approach to its regulatory mission. It provides direction to CNSC staff and information to stakeholders.

Regulatory Standard (S): a document that describes CNSC requirements. It imposes obligations on the regulated party, once it is referenced in a licence or other legally enforceable instrument.

Regulatory Guide (G): a document that indicates acceptable ways of meeting CNSC requirements, as expressed in the *Act*, Regulations, regulatory standard or other legally-enforceable instrument. It provides guidance to licensees and other stakeholders.

Regulatory Notice (N): a document that provides licensees and other stakeholders with information about significant matters that warrant timely action.

DRAFT REGULATORY GUIDE

CNSC Type I Inspections of Activities and Devices for Nuclear Substances and Radiation Device Licensees Group 3.2 Licensees

G-302-3.2

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About this Document

The purpose of the proposed Regulatory Guide is to help Nuclear Substance and Radiation Device Licensees to understand the typical elements of a Canadian Nuclear Safety Commission (CNSC) Type I inspection of licensed activities and devices. The information is provided through the inclusion in the Guides of facsimiles of the worksheets that CNSC inspectors use to capture and document the results of their respective inspections.

Comments

The CNSC invites affected stakeholders and interested persons to assist in the further development of this draft regulatory document by commenting in writing on the document's content and usefulness. The draft regulatory guide is being issued for a one year public consultation and trial use period.

Direct your comments to the postal or e-mail address below by **June 30, 2005**, referencing file 1-8-8-302, and guide G-302-3.2. The CNSC will take the comments received on this draft into account when developing it further. These comments will be subject to the provisions of the federal *Access to Information Act*.

Document Availability

This document and other similar guides can be viewed on the CNSC Website at www.nuclearsafety.gc.ca. To order a printed copy of the document in English or French, please contact:

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REGULATORY GUIDE

**Group 3.2 Licenses
G-302-3.2**

CNSC TYPE I INSPECTIONS OF ACTIVITIES AND DEVICES FOR NUCLEAR SUBSTANCES AND RADIATION DEVICE LICENSEES

Issued for public consultation and trial use by the
Canadian Nuclear Safety Commission
July 2004

CNSC TYPE I INSPECTIONS OF ACTIVITIES AND DEVICES FOR NUCLEAR SUBSTANCES AND RADIATION DEVICE LICENSEES

1.0 PURPOSE

The purpose of this Regulatory Guide is to help Nuclear Substance and Radiation Device Licensees to understand the typical elements of a Canadian Nuclear Safety Commission (“CNSC”, “Commission”) “Type I” inspection of licensed activities and devices, carried out pursuant to the *Nuclear Safety and Control Act* (“NSC Act”, “Act”), the applicable regulations and specific licence conditions authorized by the *Act* and regulations.

2.0 SCOPE

This Regulatory Guide sets out, for various activities and devices for Nuclear Substance and Radiation Device licensees, the typical elements of a CNSC “Type I” inspection of licensed activities and related programs, processes or practices. The information is provided through the inclusion in the Guides of facsimiles of the worksheets that CNSC inspectors use to capture and document the results of their respective inspections.

3.0 DEFINITION

A “Type I inspection” means all verification activities related to on-site audits and evaluations of a licensee’s programs, processes and practices.

4.0 RELEVANT LEGISLATION

The facsimiles of the inspection worksheets for the licensed activities or radiation devices reference, for each listed element of the respective Type I inspection, the relevant provision of the *Act*, the regulations or various licence conditions.

5.0 DISCLAIMER

CNSC licensees may use these worksheets voluntarily to ascertain the CNSC’s general expectations regarding regulatory requirements. Such requirements would generally be assessed during a Type I inspection of licences issued pursuant to the Nuclear Substances and Radiation Devices Regulations. The expectations listed for each regulatory requirement are only provided as a guide. Similar worksheets will be used by CNSC staff for inspections. Inspections, will, however, be carried out on a case-by-case basis in the context of the licensed activities and the circumstances of individual situations. These worksheets are not intended to limit the scope of CNSC inspections or the powers of CNSC inspectors. Licensees should contact the CNSC to obtain information regarding their specific regulatory requirements.

CNSC INSPECTIONS OF ACTIVITIES AND DEVICES FOR NUCLEAR SUBSTANCES AND RADIATION DEVICE LICENSEES

Explanatory Information for Type I and Type II Inspection Worksheets

Type I and Type II Inspection worksheets are intended for use by CNSC Inspectors who are familiar with the terminology and abbreviations appearing on the worksheets. The information below is provided for the benefit of licensees and others who may be interested in the documents.

Worksheet Columns

Risk Column:

provides the Safety and Control Area numbering (SCA 1, SCA 2, SCA 3, etc.) and the level of risk associated with the requirement.

Safety and Control Area numbering is as follows:

1. Radiation Protection
2. Emergencies and Unplanned Events
3. Environmental Protection
4. Fire Protection
5. Training and Qualification
6. Operational Procedures
7. Organization and Management
8. Quality Management
9. Non-Radiological Health and Safety
10. Public Information Programs
11. Security
12. International Obligations/Safeguards
13. Packaging and Transport

Levels of Risk are as follows:

- High (Risk Group 3) – immediate health, safety, or security risk
- Medium (Risk Group 2) – health, safety or security risk, but not immediate
- Low (Risk Group 1) – not health, safety or security risks - administrative issues

Description Column:

provides a brief written description of the regulatory requirement

Requirements Column:

provides the source of the regulatory requirement (Act, regulations, licence conditions)

Order Column:

boxes marked with a check mark mean that non-compliance with the particular requirement could result in an Order being issued by the CNSC

Compliance Expectations Column:

provides brief instructions to the Inspector on what to verify

Other Relevant Information**Compliance Expectations**

in some cases, the information will be licensee specific, so details will not be listed on the worksheets. For example, when verifying Radiation Protection Program components, the CNSC Licensing Specialist (LS) may highlight the components of the program requiring verification. This particular information is available to the Inspector from written submissions by the licensee.

Other Abbreviations

in addition to the abbreviations listed at the top of the worksheets, prefixes have been added to many of the regulatory requirements under the *Packaging and Transport of Nuclear Substances Regulations* (PTNS) and the *Transport of Dangerous Goods Regulations* (TDG) identified in the Requirements column. These prefixes have been added to provide further clarification on the particular area of interest for the requirement.

The prefixes are:

- CoO – consignor
- D – document
- EP – excepted package
- T – training
- TA – Type ‘A’ package
- TB – Type ‘B’ package
- TD – transport document
- TM – transport mode

Other abbreviations appearing in the worksheets are:

- LC – licence condition
- LS – licensing specialist
- TS – technical specialist

Type I Inspection Worksheet

Rating A - Exceeds requirements
 B - Meets requirements
 C - Below requirements
 D - Significantly below requirements
 E - Unacceptable
 N/A - Not Applicable
 N/C - Not Checked

Abbreviations

RP - Radiation Protection
 SCA - Safety and Control Area
 LC - Licence Condition

GN - General Nuclear Safety and Control
 TS-R-1 - IAEA Safety Standard 1996 Edition (Revised)
 PTNS - Packaging and Transport of Nuclear Substances
 TDG - Transport of Dangerous Goods Regulations

NSCA = Nuclear Safety and Control Act
 NSRD - Nuclear Substances and Radiation Devices
 CII - Class II Nuclear Facility and Prescribed Equipment

Use Type: 812, 831, 842, 843, 853, 854, 874, 909, 939

Licensee No/Name:
 Licence Number:
 Address:
 City: Province: Postal Code:
 Person Seen:
 Phone Number:

Report Number:
 Inspection Date:
 Inspector Name:
 Usetype Number: 812
 Risk Group: 3.00

Risk	Description	Requirements	Order	Compliance Expectations	Information Gathering Methods			
					Interviews	Observations	Documents Review	Records Review
SCA: 1 Radiation Protection								
H	Observe & obey notices (workers) Rating:	GN 17 (d) Comments:	<input checked="" type="checkbox"/>	No workers ignore or bypass warning signs and notices.	Interview staff and supervisors regarding attention to signs.	Observe staff working to note if signs obeyed.		
H	Meter calibrated Rating:	NSRD 20 Comments:	<input type="checkbox"/>	Measures implemented to ensure all meters calibrated.	Interview workers to see if survey meters are ever overdue for calibration.	Observe the calibration sticker date on the survey meters.	Review the radiation protection documentation for calibration policy & procedures.	Review calibration records.
H	Survey meter provided Rating:	NSRD 30 (3) (a) Comments:	<input checked="" type="checkbox"/>	Survey meters are provided that meet requirements - instrument range, battery power indication.	Interview workers and managers on availability of survey meters.	Examine survey meters for scale and battery level info.	Review policy manual on requirement for survey meters.	Determine if records are kept of the number of survey meters owned by the company.
H	TLD provided Rating:	NSRD 30 (3) (c) Comments:	<input checked="" type="checkbox"/>	Ensure licensee provides licensed dosimeters to ED operators.	Interview workers and managers on availability of these dosimeters.	Observe workers and note use of dosimeters.	Review policy manual on requirements for dosimeters.	
H	DRD provided Rating:	NSRD 30 (3) (d) Comments:	<input checked="" type="checkbox"/>	Ensure that all ED operators have required DRD (dose range, calibrated, worn on body).	Interview workers and managers on availability of these dosimeters.	Observe workers and note use of dosimeters.	Review policy manual on requirements for dosimeters.	
H	Alarming dosimeter provided Rating:	NSRD 30 (3) (e) Comments:	<input checked="" type="checkbox"/>	Ensure that all ED operators have required alarming dosimeter (dose range, calibrated, worn on body, fixed alarm setting, audible alarm).	Interview workers and managers on availability of these dosimeters.	Observe workers and note use of dosimeters.	Review policy manual on requirements for dosimeters.	

SCA: 1 Radiation Protection

H	Trefoil signs provided	NSRD 30 (3) (f)	<input checked="" type="checkbox"/>	Ensure that all ED operators are provided with sufficient RWS's.	Interview workers and managers on availability and type of signs used.	Observe workers and note availability of RWS's.	Review policy manual on requirements for signs.	
	Rating:	Comments:						
H	Limit doses to Non-NEW's	NSRD 30 (6)	<input type="checkbox"/>	Measures implemented to ensure doses to non-NEW's limited (0.1 mSv/wk, 0.5 mSv/y).	Interview workers and managers on methods used to determine this.		Review the policy and procedures used to ensure that dose to the public is kept below the limits.	Review records of any public doses received or estimates.
	Rating:	Comments:						
H	Dose rate after source change	NSRD 34 (2) (a)	<input type="checkbox"/>	Dose rate measurements are always taken following source changes.	Interview workers on their procedures when removing or inserting a source.	Observe a source change if possible.	Review the procedures manual for removing or inserting a source.	
	Rating:	Comments:						
H	Dose during source change	NSRD 34 (2) (b)	<input type="checkbox"/>	Dose measurements are taken following source changes.	Interview workers on their procedures when removing or inserting a source.	Observe a source change if possible.	Review the procedures manual for removing or inserting a source.	
	Rating:	Comments:						
H	R.P. Program	RP 04 (a)	<input type="checkbox"/>	VVerify the Radiation Protection program submitted in the licence application and supporting documentation from the licensee, has been implemented by the licensee. Specific Radiation Protection Audit criteria may be used as a licensee performance measurement tool with appropriate notice and disclosure given to the licensee.	Interview personnel at all levels of the organization about the operation of the occupational RP program.	Conduct field observations to verify that radiation policies and procedures are implemented appropriately.	Review radiation protection manual, guiding policies, radiation work procedures.	Review dose records, incident/event reports, calibration records, employees qualifications and training records.
	Rating:	Comments:						
H	Doses measured	RP 05 (1)	<input type="checkbox"/>	Measures implemented to measure and record all radiation doses.	Question RSO and workers about the measurement of radiation doses.	Observe workers use of personal dosimetry instruments and devices.	Review radiation protection manual (section on dosimetry), guiding policies, and workers RP training manual.	Review the organization's dosimetry records.
	Rating:	Comments:						
H	Ascertaining of dose directly	RP 05 (2) (a)	<input type="checkbox"/>	Direct measurements made when applicable. (ED operators).	Interview staff, RSO, management regarding use of dosimeters.	Observe workers and note use of dosimeters.		
	Rating:	Comments:						
H	Dose limits/body	RP 13 (1)	<input checked="" type="checkbox"/>	Verify that licensee has a process to ensure workers do not receive a dose above dose limit.	Interview staff, RSO and management regarding any overexposures and what measures are in place.			Review dose records.
	Rating:	Comments:						

SCA: 1 Radiation Protection

H	Container/device labeled	RP 20(1)(a)	<input type="checkbox"/>	All containers and devices labelled with RWS as required.	Question workers and RS staff regarding labels.	Observe labelling of containers or devices.	Review licensee procedures on use of RWS signs.
	Rating:	Comments:					
M	Dosimeter returned to licensee	NSRD 31 (2)	<input type="checkbox"/>	All dosimeters returned to licensee by required date. (15 days).	Interview the workers on when they return their dosimeters (TLDs).		Review the work procedures regarding dosimeters (TLDs) - review the training manual on dosimetry.
	Rating:	Comments:					Review records of dosimeters (TLDs) being returned.
M	Ascertaining of dose indirect	RP 05 (2) (b)	<input type="checkbox"/>	Doses estimated where applicable (public and Non-NEWs).	Interview staff, RSO, management regarding estimates of doses to NEWs or non-NEWs.	Observe general working or storage areas and note considerations for non-NEWs.	Review radiation protection manual (section on dosimetry), guiding policies, and workers RP training manual.
	Rating:	Comments:					Review the organization's dosimetry records.
M	Action level	RP 06	<input type="checkbox"/>	Actions required by the license are taken when action levels exceeded.	Question RSO and staff if they are aware of action levels, the required responses, and if the action levels have been exceeded.		Review document(s) that provide 1. the CNSC approved action levels, and 2. what specifically is to be done when the levels are exceeded.
	Rating:	Comments:					Review records if they exist of cases where action levels have been exceeded (to determine if the 3 licensee actions specified in the regs have been taken).
M	Container/device source details	RP 20 (1) (b)	<input type="checkbox"/>	Required details are on labels.	Question workers and RS staff regarding labels.	Observe labelling of containers or devices.	Review licensee procedures regarding labels.
	Rating:	Comments:					

SCA: 2 Emergencies and Unplanned Events

H	Reportable incidents	GN 29	<input type="checkbox"/>	Licensee has a process in place to ensure that incidents are reported.	Interview management and staff regarding occurrence of reportable incidents and whether they were reported.		Is there a procedure dealing with reporting to the CNSC?
	Rating:	Comments:					Review reports in CNSC file or Licensee's File.
H	Failed leak test	NSRD 18 (3)	<input checked="" type="checkbox"/>	Measures are in place to respond to failed leak test.	Interview management on their knowledge of reporting obligations to the CNSC. Question workers regarding leak tests.	Observe a leak test being conducted (if possible).	Review the work procedures - review training material.
	Rating:	Comments:					Review records of leak testing being conducted and the results - review reports to CNSC (if any).
H	Emergency material provided	NSRD 30 (3) (b)	<input checked="" type="checkbox"/>	Measures implemented to ensure required emergency equipment (tongs, shielding, cutters) available when external guide tube used.	Interview workers and managers on availability of equipment to be used with an assembly guide tube.	Observe work using external guide tube.	Review policy manual on requirements for equipment to be used with an assembly guide tube.
	Rating:	Comments:					

SCA: 2 Emergencies and Unplanned Events

H	Licensee notified of incidents regarding ED	NSRD 31 (1) (m)	<input type="checkbox"/>	All ED operators notify licensee as required.	Interview the workers on their reporting to their managers.		Review the work procedures used for jobs to see what is required to be reported to manager - review the training manual.	Review incident records kept of these 4 different types of incidents.
	Rating:	Comments:						
H	Licensee's Reports	NSRD 38	<input type="checkbox"/>	All required preliminary and final reports submitted and contain required information. ED lost, stolen or damaged. ED has high dose rate. Sealed source separated. Source return failure	Interview workers and managers on the procedure for reporting of ED incidents. Knowledge of reporting requirements.		Review procedures for reporting of events.	Review record of ED incidents & licensee's record of reports made to the CNSC
	Rating:	Comments:						

SCA: 5 Training and Qualification

H	Sufficient workers	GN 12 (1) (a)	<input type="checkbox"/>	The number of qualified workers on-site coincides with the number specified in accepted documentation (i.e. licence application or change notifications)	Interview a few key workers and managers.			Organization charts - Employee lists (positions).
	Rating:	Comments:						
H	Mandatory training	GN 12 (1) (b)	<input type="checkbox"/>	Verify all workers are provided training to carry out licensed activities prior to access to or use of Nuclear Substances.	Question workers - trainers.	Workers carrying out work procedures (skills) - workers' knowledge.	Training policy - training program description - work procedures.	Training records.
	Rating:	Comments:						
H	CEDO to operate	NSRD 24	<input checked="" type="checkbox"/>	Measures implemented to ensure all ED's operated by qualified operator or supervised trainee.	Interview managers and workers regarding ED operation.	Observe a job unannounced and determine qualifications of personnel.	Review company policy on who is authorized to operate an exposure device.	Review records of employees for which are certified and which are trainees.- review any records of past jobs and workers assigned.
	Rating:	Comments:						
H	Nuclear Eenergy Workers informed	RP	<input type="checkbox"/>	Measures implemented to inform NEWs (risks, dose limits, status, pregnancy) and obtain written acknowledgement.	Interview workers to determine if they received the RP information and signed written acknowledgement. (Note- experience has shown many workers forget they have signed these.)		Review the employee radiation protection training documentation - get a copy of the written handout that is provided to employees.	Review the employee training records - check records of new employee's training.
	Rating:	Comments:						
M	Licensee appointment for trainee	NSRD 32 (1)	<input type="checkbox"/>	All Supervisors of trainees appointed as required.	Interview workers and managers on their procedures for supervising trainees.		Review the policy and procedure manuals regarding supervision of trainees.	Review the records kept of certified operators supervising trainees.
	Rating:	Comments:						

SCA: 6 Operational Procedure

H	Device provided & maintained	GN 12 (1) (d)	<input checked="" type="checkbox"/>	All necessary devices to carry out licensed activities have been provided.	Interview employees on the availability and physical condition of devices.	Radiation survey meters - TLDs, PADs? - note physical condition.	Documents listing required devices.	
	Rating:	Comments:						
H	Use of equipment & procedures	GN 12 (1) (e)	<input type="checkbox"/>	Measures are implemented to ensure that workers are using necessary equipment and following procedures.	Interview workers regarding their use of required equipment, devices, clothing and procedures.- Interview workers and supervisors regarding supervision.	Observe workers using required equipment, clothing and procedures.- Observe level of supervision of workers.	Documents containing policies and procedures on use of equipment, devices, clothing.- training manuals.	Records of non-compliance events - (regarding compliance with policies, procedures on use of equipment, devices, clothing and procedures).
	Rating:	Comments:						
H	Authorized transfer	GN 13	<input type="checkbox"/>	Ensure means are in place to verify receivers of nuclear substances or exposure devices are licensed.	Interview owners/managers/RSO regarding the transfer (disposal or sale etc.) of devices or sources.		Review any documents that provide the policy and procedures to follow on transfers of devices or sources.	Review records kept of the actual transfer of devices or sources.
	Rating:	Comments:						
H	Worker's use of protection	GN 17 (a)	<input checked="" type="checkbox"/>	No workers work without appropriate equipment.	Interview staff and supervisors regarding use of protective equipment.	Observe staff working to note if equipment used.		
	Rating:	Comments:						
H	Procedures followed	GN 17 (b)	<input checked="" type="checkbox"/>	All workers follow established procedures.	Interview staff and supervisors regarding use of procedures.	Observe staff working to note if procedures followed.	Review procedures to be observed.	
	Rating:	Comments:						
H	Maintenance requirements	LC 2719-1	<input checked="" type="checkbox"/>	Verify that a process is in place to ensure that 'S' tube inspections are carried out as per manufacturer's specifications.	Interview RSO, workers and maintenance staff regarding 'S' tube inspections.		Review maintenance procedures.	Review maintenance records.
	Rating:	Comments:						
H	Head Hose Nozzle Cap Dye-Penetrant Tests	LC 2720-1	<input type="checkbox"/>	Verify that a process is in place to ensure required penetrant tests are performed on all the head hose nozzle caps.	Ask RSO and workers about dye penetrant tests.		Review procedures manual.	Review maintenance records.
	Rating:	Comments:						
H	No transfer of uncertified device	NSRD 11 (2)	<input checked="" type="checkbox"/>	Measures implemented to ensure that no uncertified devices transferred.	Question staff and RSO about transfer procedures.			Review transfer records if applicable.
	Rating:	Comments:						
H	Locked device (licensee)	NSRD 30 (1) (b)	<input type="checkbox"/>	Measures implemented to ensure all devices locked when not in use.	Interview managers and workers on work procedures (locking, storing).	Observe the locking mechanism- observe the storage location.	Review the company policy and procedures - review the training manual.	Review any records of incidents of non-conformance - review employee training records.
	Rating:	Comments:						

SCA: 6 Operational Procedure

H	Locked device (worker)	NSRD 31 (1) (l)	<input type="checkbox"/>	All ED Operators lock device after use.	Interview workers as to what their usual habits are on locking the devices.	Obsrve workers and note device locking.	Review the work procedures used for jobs - review the training manual.	Review the incident records to determine if any incidents of this nature have been reported.
	Rating:	Comments:						
H	Transfer records	NSRD 36 (1) (c)	<input checked="" type="checkbox"/>	All transfers are recorded as per requirements. (date, supplier/recipient, recipient license #, NS/source/Device details).	Interview management and RSO on the steps that are taken when a nuclear substance (source) is to be returned or transferred.		Review the procedures for keeping records of sources that are transferred.	Review the records of any sources that have been transferred
	Rating:	Comments:						
H	If dose limit exceeded	RP 16	<input type="checkbox"/>	Requirements followed after dose limit exceeded. (notifications, work restriction, investigate, corrective actions, final report to CNSC).	Interview senior radiation protection employees and employees working with dosimetry records regarding actions taken.		Review company document(s) that describe actions to be taken when dose limits are exceeded.	Review records (if any) of cases were the dose limits have been exceeded.
	Rating:	Comments:						
M	H & S info	GN 16 (1)	<input type="checkbox"/>	Verify that workers are provided with H&S information required by ACT, Regs and Licence.	Interview workers on how they are provided with work related health and safety information.	Observe if dose data are made available for staff (i.e. posted).	Review training manuals for content of courses.	Review employee training records for dates of course completion.
	Rating:	Comments:						
M	Source tag (licensee)	NSRD 30 (1) (a)	<input type="checkbox"/>	Measures implemented to ensure all devices have required tag.	Interview managers and workers regarding ED tags.	Observe the id tags on the exposure devices.		
	Rating:	Comments:						
M	DRD record	NSRD 31 (1) (e)	<input type="checkbox"/>	All ED operators keep daily dose record.	Interview the workers on how they keep their record of daily doses.	Observe workers and note use of daily dose record.	Review the policy and procedures on how records are to be maintained on daily doses.	Review the written records of daily doses from past jobs that workers have kept.
	Rating:	Comments:						
M	Dose records submitted to licensee	NSRD 31 (3)	<input type="checkbox"/>	All dose records submitted by required date.	Interview the workers on when they return their dose records.		Review the work procedures regarding dosimeters (TLDs) - review the training manual on dosimetry.	Review dose records submitted by workers at the end of each 15 day period.
	Rating:	Comments:						
M	Training records	NSRD 36 (1) (d)	<input type="checkbox"/>	All worker training records available.	Ask RSO about the training records.			Review the training records for workers.
	Rating:	Comments:						

SCA: 7 Organisation and Management

H	No Authorization to use malfunctioning ED	NSRD 30 (4) (a)	<input checked="" type="checkbox"/>	Means are in place to prohibit use of malfunctioning ED.	Interview workers, RSO and supervisors.	Observe general condition of devices.		
	Rating:	Comments:						

SCA: 7 Organisation and Management

M	Change notified	GN 15 (c)	<input type="checkbox"/>	Ensure that means are in place to notify the CNSC when contact person or responsible person is changed.	Ask RS and Administrative staff how the CNSC are notified regarding changes.		Review procedures for CNSC notifications.	
	Rating:	Comments:						
M	Source change consent	NSRD 30 (5)	<input type="checkbox"/>	Measures implemented to ensure written authorization given for source change.	Interview workers on the use of written authorizations.	Observe the written authorization for a particular job.	Review policy regarding written authorizations.	Review the records of written authorizations for past jobs if kept.
	Rating:	Comments:						

SCA: 11 Security

H	Security	GN 12 (1) (g)	<input type="checkbox"/>	Measures have been implemented to alert licensee for theft, etc. Physical, lockable barrier in place for every storage location.	Question staff regarding the security measures.	Observe security measures.		Inventory control of devices containing radioactive sources.
	Rating:	Comments:						
H	Instruct workers on physical security	GN 12 (1) (j)	<input type="checkbox"/>	All workers have been provided instruction regarding local security procedures.	Interview workers on their knowledge of their obligations towards physical security at the site.		Review training manuals for inclusion of the physical security at the site and workers' obligations.	
	Rating:	Comments:						

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