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**From:** Jason MacDonald <Personal information redacted>  
**Sent:** July 11, 2019 10:06 AM  
**To:** Consultation (CNSC/CCSN)  
**Subject:** submission  
**Attachments:** CNSC Lens of Eye.pdf

Good Morning,

Please find attached our submission letter in regards to the proposed amendments to Radiation Protection Regulations.

Thank you,

Jason MacDonald  
**Field Representative**  
**CANADIAN UNION OF SKILLED WORKERS**  
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July 10, 2019

Mr. Brian Torrie  
Director General,  
Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
280 Slater St, P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

Reference: *Canada Gazette*, Part 1, Volume 153, dated June 15, 2019

Dear Mr. Torrie

The Canadian Union of Skilled Workers would like to thank you for the opportunity to comment on the proposed amendments to the Radiation Protection Regulations as stated in the *Canada Gazette*, Part 1, Volume 153, dated June 15, 2019. While the Canadian Union of Skilled Workers will always stand at the forefront supporting the highest standards in workplace safety culture, we do have concerns with some of the regulation amendments proposed in the *Gazette* publication.

One particular area that is of concern for the Canadian Union of Skilled Workers and our members is surrounding the amendments to new dose limits for lens of the eye. Currently the limits for lens of the eye over a 1 year period are regulated to 150 mSv, with no limit listed for the 5 year timeframe. The proposed amendments would put the new dose rates at 50 mSv over a 1 year period, with a 5 year limit of 100 mSv, which would equate to approximately 20 mSv per year max. While we respect the key elements listed in the proposed amendments we feel strongly that the new limits for lens of the eye will greatly increase the chances of our members being denied work due to the much lower administrative dose limits.

The lack of ability to measure lens of the eye dose directly will bring conservative estimates into play when monitoring dose limits which may also increase the probability of work denial for our members. Upon further investigation the Canadian Union of Skilled Workers has learned that these measures are intended to aid in the prevention of cataracts in workers, not cancer, however there is no scientific consensus to support the proposed new limits as was clear in the US NRC decision not to adopt new limits stating the lack of evidence surrounding safety benefit. The degree of uncertainty surrounding the implementation of the proposed limits including but not limited to the lack of ability for accurate measurements etc. leads the Canadian Union of Skilled workers to disagree with the CNSC's proposal that these new limits will have no impact on workers and businesses. Furthermore, the lack of consultation with Unions and other industry partners who's skilled workers will be significantly affected by the proposed amendments leads the Canadian Union of Skilled Workers to request that the Canadian Nuclear Safety Commission engage all stakeholders in a thorough consultation process ensuring all stakeholders concerns are addressed prior to the implementation of the proposed new dose limits.



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The Canadian Union of Skilled Workers looks forward to the opportunity for consultation with the Canadian Nuclear Safety Commission in regards to this matter ensuring our skilled men and women can continue to perform safely and efficiently at our Canadian Nuclear facilities now and in the future.

Sincerely,

John Wabb  
Vice President,  
Canadian Union of Skilled Workers