

Department of National Defence/Director Nuclear Safety comments on  
CNSC REGDOC-2.10.1 – Emergency Management and Fire Protection, Volume II:  
Framework for Recovery After a Nuclear Emergency

General:

The document should mention that DND, which is excluded for the application of the NSCA, can also authorized the conduct of activities involving radioactive materials and nuclear reactors (aka “nuclear activities”). Specific areas where this is important are indicated in the comments below. Add a footnote in the Scope, where DND authorization holder should be mentioned for the first time.

Page 1, 1.3 Scope, 2<sup>nd</sup> para, 1<sup>st</sup> sentence:

“Public domain” also exclude areas that are under the direct control of a DND authorization holder. Add “or a DND authorization holder” after “CNSC licensee”.

Page 4, 2.2 Exposure situations, 5<sup>th</sup> para 1<sup>st</sup> sentence:

There are orders and directives (equivalent to regulations) and authorizations conditions that apply to DND authorization holders for the management of planned and emergency exposure situations. Remove “established through the NSCA” and add “and DND authorization holders” after “CNSC licensees”.

Page 7, 2.3 Nuclear emergency response roles and responsibilities in Canada, 5<sup>th</sup> para, 2<sup>nd</sup> sentence:

This also applies outside the boundaries of DND properties where nuclear activities are authorized. Add “and DND properties where activities involving radioactive materials and nuclear reactors are authorized” after “CNSC-licensed nuclear facilities”.

Page 7, Figure 2, Second box and Page 8, 3.1 Federal plans for recovery, 1<sup>st</sup> para, 1<sup>st</sup> sentence:  
There is no “R” in FNEP. Remove “Response”.

Page 9, 3.1.2 Recovery activities described in the *FNEP*, 1<sup>st</sup> para, last sentence:

Some partners may not be involved in recovery operations. Replace “will” by “may”.

Page 9, 3.2 Provincial plans for recovery, 1<sup>st</sup> para, 1<sup>st</sup> sentence:

Replace “several” by “three” and replace “capable of hosting” by “authorized to host”.

Page 9, 3.2 Provincial plans for recovery, 1<sup>st</sup> para, 2<sup>nd</sup> sentence:

This statement is not true. Nova Scotia does not have a nuclear emergency plan. Remove this sentence.

Page 10, 3.4 Nuclear Liability and Compensation Act regime, 2<sup>nd</sup> para:

Editorial comment. Add a space between “an” and “incident”.

Page 12, 4.2 Return to a new normal, 3<sup>rd</sup> para, 3<sup>rd</sup> sentence:

Editorial comment. Remove “the” before “some”.

- Page 13, 4.2.1 Psychological considerations, 4<sup>th</sup> para, 2<sup>nd</sup> sentence:  
Depression and PTSD are not effects typically associated with radiation exposure. Replace “radiation exposure” by “radiological concerns”.
- Page 14, 4.2.2 Mitigation of psychosocial effects, 1<sup>st</sup> bullet, 1<sup>st</sup> sentence:  
Editorial comment. Add “to” after “related”.
- Page 14, 4.2.2 Mitigation of psychosocial effects, 1<sup>st</sup> bullet, 2<sup>nd</sup> sentence:  
Uncertainty and concerns can never be completely alleviated. Replace “should” by “would help to”.
- Page 14, 4.2.2 Mitigation of psychosocial effects, 1<sup>st</sup> bullet, 3<sup>rd</sup> sentence:  
What happens within family units is out of control of authorities. Remove this sentence.
- Page 14, 4.2.2 Mitigation of psychosocial effects, 3<sup>rd</sup> bullet, last sentence:  
Editorial comment. Add “provide” before “appropriate”.
- Page 15, 5.1 Implementation of protection strategies for recovery, 3<sup>rd</sup> para, last sentence:  
Editorial comment. Fix the link to the first reference.
- Page 16, 5.1 Implementation of protection strategies for recovery, 1<sup>st</sup> para (on page 16), 1<sup>st</sup> sentence:  
Editorial comment. Add “for” after “Responsibilities”.
- Page 17, 5.1.1 Recovery phase protective actions implemented by the recovery management organization(s), 2<sup>nd</sup> para (on page 17), last sentence:  
This guidance is very subjective. A range of numbers (e.g., external dose rates) should be provided.
- Page 17, 5.1.2 Self-help actions, 4<sup>th</sup> para, first sentence:  
Editorial comment. Add “is” after “actions”.
- Page 18, 5.2 Environmental and food chain monitoring, 2<sup>nd</sup> para, last sentence:  
A limited number of people are interested in data. Most people want information (based on interpretation of data). Replace “data” by “information products”.
- Page 18, 5.2 Environmental and food chain monitoring, 3<sup>rd</sup> para, 4<sup>th</sup> bullet:  
Additional details should be provided. Replace by “The Department of National Defence has an Environmental Radionuclide Monitoring Program. This program includes the collection and analysis of visit specific water samples and periodic sediment, aquatic plant and food samples in the areas around the berthing locations of foreign nuclear powered vessels to verify that there is no man-made radionuclide in the environment”.
- Page 20, 5.3 Exposure pathways and dose assessments, last para, 2<sup>nd</sup> sentence:  
If significant releases to the air are still possible, we should not be in the recovery phase of a nuclear emergency. Replace “should” by “would” and “may” by “will”.

Page 23, 5.4 Health monitoring, 4<sup>th</sup> para, 4<sup>th</sup> bullet:

The transition phase precedes the recovery phase. Replace “prior to” by “during the transition phase”.

Page 24, 5.5 Epidemiological studies, 1<sup>st</sup> para, 4<sup>th</sup> bullet:

SIN should not be used for this purpose. Provincial health insurance numbers should be used as a unique identifier instead. Remove this bullet.

Page 25, 5.6 Management of contamination, 2<sup>nd</sup> last para, last sentence:

Editorial comment. Replace “areas” by “Areas”.

Prepared by: Roger Hugron, Director Nuclear Safety 3

Date prepared: 24 July 2018