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Via E-mail

08 MAR 2016

Dear Sir/Madame:

RE: Environmental Policy, Assessments and Protection Measures Draft REGDOC

Thank you for the opportunity to comment on Draft REGDOC-2.9.1.

I have been involved with dozens of Nuclear Substance licence renewal applications and several new licence applications. I have never submitted to CNSC nor have I ever been asked by CNSC to submit an Environmental Risk Assessment (ERA) with a Nuclear Substances licence renewal or new licence application.

I think that the scope of this draft REGDOC is much too wide and that consideration should be given to a number of NSRD licence types in the medical and academic sectors that ordinarily do not appear to require an ERA much less an Environmental Assessment.

I suggest that many medical RSOs do not have routine access to CSA Standards documents. Seventy-five percent (75%) of the CSA Standards referenced in the draft REGDOC pertain only to Class I Nuclear Facilities.

Thanks to Peter Fundarek for bringing this document to the attention of the CNSC-CRPA Working Group. I suspect that many NSRD licensees and RSOs saw the title of this document and stopped reading, never considering the potential impact and tremendously increased administrative burden to their operations should this draft REGDOC not be suitably amended.

Sincerely,

J. Dovyak

Jeff Dovyak RTNM, CRPA (R)
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