
From: Camba, Roberto <Personal Information Redacted>
Sent: November 20, 2019 11:54 AM
To: Consultation (CNSC/CCSN)
Subject: Comments
Attachments: Comments to REGDOC-1.6.2 AM Inspection Ltd.pdf

Hello:

Thank you for the opportunity to provide feedback on REGDOC-1.6.2. Please see attached AM Inspection comments about the proposed document.

Best regards,

Roberto Camba Baldomar
NDT Manager, RSO
Red Flame Industries – AM Inspection Ltd.
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November 19, 2019

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

Ref.: AM Inspection Ltd. comments on REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences

Dear Mr. Torrie:

AM Inspection Ltd. would like to thank the CNSC for the opportunity to comment on REGDOC-1.6.2. Upon review of the proposed regulatory document in detail, we would like to share our comments, as outlined in the attached document.

Sincerely yours,

A handwritten signature in black ink that reads "Ramba B".

Roberto Camba Baldomar
NDT Manager, RSO
AM Inspection Ltd.

A handwritten signature in blue ink that reads "Trevor Hull".

Trevor Hull
Operations GM Canada, Applicant Authority
AM Inspection Ltd. – Red Flame Industries

Comments on draft REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences.

#	Document / Excerpt of Section	Industry Issue	Suggested Change (if applicable)	Major Comment/ Request for Clarification	Impact on Industry, if major comment
1.	1.2 Scope 2 nd paragraph	By including “multiple licensed locations” as criteria to determine when a RPP is “complex”, the Regulator is equaling the requirements further established ahead in the REGDOC, for big organizations with many different locations in several provinces, or small companies with a temporary or overnight parking location in the same province.	<p>“Characteristics of a complex program include, among others:</p> <ul style="list-style-type: none"> • consolidated use of nuclear substances licence (use type 815) • multiple licensed locations depending on the organizational size and geographic disparity of sites • multiple licences issued at the same location • multiple licences issued for the same organization” 	MAJOR	Small companies with geographically – concentrated operations will be unsustainably burdened with additional requirements mentioned ahead in the document, if their RPP is considered “complex”.
2.	3.1 Duties 1 st and 4 th paragraphs	The idea of RSO responsibilities as essential to the industry is laudable, but the language used basically states that organizations with complex RPP not using a full-time RSO are not meeting CNSC expectations.	<p>“...The responsibilities of an RSO are not an adjunct to another shall be prioritized over other job tasks of the RSO...”</p> <p>“...For overseeing a complex RPP, the regulatory burden is expected recommended to be handled by a full-time RSO. For low-risk use types, the RSO could manage the RPP on a part-time basis, while assuming other duties...”</p>	MAJOR	CNSC should not get involved in the internal manpower organization of the different Licensees.
3.	3.5 Continuing education 3 rd paragraph	Lengthy is a relative and non-quantitative measure of time which allows several interpretations for different Licensees.	<p>“...Refresher training should be provided at least every five years and when changes to regulatory requirements or licence conditions occur, or in the case of an RSO’s return after a lengthy more than two (2) years of absence...”</p>	Request for clarification	

Comments on draft REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences.

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4.	3.6 RSO staffing 2 nd paragraph	Even though this paragraph express guidance or advice, the word “available” is not clearly defined, and store an exposure device is also a “licensed activity”. Please clarify the term and advise if a RSO or Alternate shall be physically available or “on call” on a 24/7/365 basis	“The corporate RSO or any person assigned RSO duties, such as an alternate RSO, a site RSO or a consultant, should be <u>available</u> while licensed activities are being performed.”	Request for clarification	
5.	3.6.1 Alternate RSO 2 nd paragraph	Even though this paragraph express guidance or advice, and some examples of “short-term absence” are provided, by not making it a quantitative concept, this forces companies to notify absences, even for a 1-day illness or a 3-day vacation. Furthermore, it does not define which authority in CNSC must be notified. If the purpose is to ensure the right person receives CNSC communications during the absence, it shall be noted that different CNSC Divisions send communications to RSO.	“...The CNSC should be notified in the case of short-term absences (of seven days or more)...” <i>Please also define which authority in CNSC must be notified.</i>	MAJOR	This creates an additional and unnecessary burden for both Licensees and CNSC.
6.	3.6.2 Site RSO 1 st and 2 nd paragraphs	Even though this paragraph express guidance or advice, since “licensed activities in more than one geographical location” can include overnight parking storage in an employee house or a client’s temporary jobsite; this request does not seem realistic and can be achieved the corporate RSO or alternate as it has worked until now.	“... When a licence application to conduct licensed activities in more than one geographical location is submitted, a site RSO should be appointed at each licensed location to implement and maintain the RPP... The site RSO should have similar levels of experience, training and authority as the corporate RSO... ”	MAJOR	This creates additional financial and time constraints for Licensees especially in small companies with locations geographically close.

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7.	5.3 Event investigation 2 nd paragraph	There is a substantial difference between regulatory limits and the internal action levels that the CNSC Licensing Division typically demands from Licensees. While regulatory limits are rarely exceeded in Canada and correctly require a report to CNSC, action levels are far more common, normally are the result of accumulated workload and not a single event, and are recurring (the NEW who exceeded an action level for a given period frequently exceeds an action level for the next period since the values accumulate during the year).	“...When regulatory limits are exceeded or events are determined to be systematic (e.g., recurring action level exceedances) , a detailed event report must be provided to CNSC staff...”	MAJOR	This additional reporting requirement will impose a bigger burden on RSO and Licensees, and it will likely not translate into safer work practices or lower doses received by the employees.
8.	Appendix B.1 3.	The term “radiation exposures” in the NDT industry is typically understood as each exposure of the nuclear source out of the exposure device to produce a radiography, so it can be misunderstood.	“...ensure that radiation exposures for all Nuclear Energy Workers and general public are maintained ALARA...”	Request for clarification	