
From: Trevor Beniston <personal information redacted>
Sent: January 27, 2020 3:33 PM
To: Consultation (CNSC/CCSN)
Subject: Comments on REGDOC 1.6.2
Attachments: REGDOC-1.6.2_Comments_Jan2020.pdf

Please see attached.

Thank you for the opportunity to comment.

Trevor



Trevor Beniston, CRPA(R) | Provincial Radiation Safety Leader
Alberta Health Services
11560 University Avenue, Edmonton, Alberta, Canada T6G 1Z7
Office: [personal information redacted] | **Mobile:** [redacted] | ahs.ca

This message and any attached documents are only for the use of the intended recipient(s), are confidential and may contain privileged information. Any unauthorized review, use, retransmission, or other disclosure is strictly prohibited. If you have received this message in error, please notify the sender immediately, and then delete the original message. Thank you.

January 24, 2020

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario, K1P 5S9

Re: Comments on proposed REGDOC-1.6.2

Dear Sir or Madam,

Thank you for the opportunity to provide feedback on the draft REGDOC-1.6.2, *Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences* published November 2019. Observations, comments, and request for clarification on the document have been collected in Attachment A.

One item I would like to raise immediately is the missing “draft or consultative copy” notice on the documents cover that has appeared on previous REGDOC drafts. Other than the lack of catalogue number on the inside first page of the document, there is no mention that it is a proposed copy for consultation. Clearly communicating the ‘draft’ nature of the document is important to avoid confusion in both the present and the future as to the official status of the REGDOC.

Our organization supports the CNSC’s work in producing guidance documents such as REGDOC 1.6.2. I hope that this feedback helps in its continued development.

If you require further information or have any questions regarding the submission, please do not hesitate to contact me.

Regards,



Trevor Beniston, CRPA (R)
Provincial Radiation Safety Leader
Cancer Control Alberta

Attachment

Attachment A

Cancer Control Alberta comments on proposed REGDOC-1.6.2, *Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences*

Alberta Health Services, CancerControl Alberta comments on proposed REGDOC-1.6.2

Item Number	Section	Issue Raised	Comment
1	2 Paragraph 3	“The applicant authority should ensure that sufficient resources are allocated to the RSO...”	<p>Many non-compliances by licensees can be traced back to insufficient resource allocation (money, personnel, time) to the RPP. One of the primary responsibilities of the applicant authority is to ensure there are proper resources allocated to the RPP and cannot be optional.</p> <p>Recommend changing “should” to “must”.</p>
2	3.1 Paragraphs 1 & 4	<p>“The applicant authority should ensure that competing duties or priorities are not assigned to the RSO that might detract significantly from their ability or availability to manage the RPP.”</p> <p>and</p> <p>“The RSO must be given sufficient time to properly plan, monitor, manage and conduct the activities required to demonstrate compliance with all regulatory requirements.”</p>	<p>The use of “should” and “must” seen contradictory here. Many licensees have ‘part-time’ RSOs that struggle with managing the RPP due to time constraints and competing priorities. This has been a continuing issue for some time and can be largely resolved by making it the responsibility of the applicant authority to ensure they have either selected a person that has sufficient time to devote to the RPP or have provided that person with the necessary time.</p> <p>Recommend changing “should” to “must”.</p>
3	3.3 Paragraph 1	“...in accordance with the licence conditions of the CNSC licence.”	<p>To a new licensee or inexperienced RSO, this wording can give the impression that RSO only needs knowledge about the licence conditions, and no other regulatory criteria such as legislation and regulations.</p> <p>Recommend rewording to state “...in accordance with the applicable regulatory criteria” to be more encompassing.</p>
4	3.3 Paragraph 2	“...accreditation programs for RSOs...”	<p>What does the CNSC consider an accreditation program for an RSO in Canada?</p> <p>The CRPA(R) designation offered by the CRPA is probably the closest thing to RSO designation but it is meant to identify Registered Radiation Safety Professionals and not specifically RSOs.</p>

			Further expansion on the CNSC perspective on RSO accreditation is encouraged.
5	3.5 Paragraph 3	“RSOs should be made aware of any changes...”	<p>As the administrator of the licence and the responsible party for overseeing compliance, the RSO has to be aware of any changes to regulatory requirements that affect the licences activities. From a regulator’s perspective, it is reasonable that the RSO is expected to keep up to date on regulatory changes as much as practical. Using the word “should” weakens this responsibility.</p> <p>If the wording remains as “...should be made aware...” who is responsible for making the RSO aware of the changes?</p> <p>Recommend rewording to “RSOs are expected to be aware of any changes...”</p>
6	3.6 Paragraph 2	“The corporate RSO or any person assigned RSO duties, such as an alternate RSO, a site RSO or a consultant, should be available while licensed activities are being performed. ”	<p>Does this imply that an RSO (primary or alternate) must be present during all operational hours with which the licensed activity is conducted?</p> <p>How does the CNSC define “available” in this context?</p>
7	3.6.1 Paragraph 2	“The CNSC should be notified in the case of short-term absences.”	<p>How does the CNSC define ‘short-term’ absences? A “short-term absence” could be as short as 1 or day medical appointments to a couple of weeks for a vacation. Recommend providing a period or definition for “short-term” in this context.</p> <p>Suggest a period less than 60 days be defined as “short-term”. This would be in alignment with section 15.11 of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i>.</p> <p>GNSR 15 already requires the licensee to notify the CNSC of their RSOs (corporate, site, alternate or otherwise). As long as the alternate RSO is capable of covering for the primary RSO, what is the benefit of prior notification to the CNSC?</p>

			Although the statement is only a suggestion (“should be notified”), informing the CNSC of short absences seems excessive and not to provide any value.
8	3.6.1 paragraph 3	“...long term absences...”	Recommend providing a period or definition for “long-term” in this context. Suggest a period over 60 days as “long-term”.
9	5.1 Paragraph 6	“From time to time, it is important to reflect on the maturity of the organization’s safety culture. At Stage 1, there is an awareness...”	The paragraphs ends without any further expansion of this idea. Not suggesting that all the stages be defined here but the wording abruptly ends without providing reasons as to why it is important to reflect on the maturity of the safety culture.
10	5.2.1 Paragraph 2	“Based on best practices, self-assessments should be performed at least annually...”	This seems to conflict (or at least could create some confusion) with section 5.2 which states the RPP should be assessed every five years.
11	5.3 Paragraph 2	“...events are determined to be systematic (e.g., recurring action level exceedances), a detailed event report must be provided to CNSC staff.”	The word “systemic” might be the better choice than “systematic” given the message of the sentence.
12	5.3 Paragraph 3	“The corrective actions taken to resolve problems associated with the event need to be accepted by the applicant authority...”	Acceptance of corrective actions would be subject to the management structure and incident management process in place with the licensee. Not all corrective actions need to be accepted by the applicant authority. However, there definitely needs to be a process with which to inform and involve the applicant authority at some level of incident that is appropriate for the size and complexity of the organization.