
From: Samantha Eustace <personal information redacted>
Sent: January 13, 2020 2:18 PM
To: Consultation (CNSC/CCSN)
Cc: Jeff Dovyak
Subject: Comments on Draft REGDOC-1.6.2
Attachments: Comments draft regdoc 1.6.2 Jan 2020.doc

Dear Sir/Madame:

My comments on Draft REGDOC-1.6.2 are attached.

Regards
Samantha Eustace

7th January 2020

Consultations
Canadian Nuclear Safety Commission
PO Box 1046 Station B
280 Slater Street
Ottawa ON
K1P 5S9

Re: Invitation to comment on draft REGDOC 1.6.2 Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences

Dear Sir/Madame,

Thank you for the opportunity to comment on draft REGDOC 1.6.2. I would like to submit the following comments related to the document.

It is appreciated that there is a separate appendix dealing with complex radiation safety programs that utilize corporate RSO's, however in the body of the document there should be more direction or more concise wording regarding items that may be carried out by a corporate RSO in place of the site RSO as the current wording causes the following concerns;

With regard to section 3.2 on the authority of the RSO, I feel that for a complex radiation safety program, such as those encountered in large health care settings, it is not necessarily appropriate for the site RSO to require direct contact with the applicant authority. In these complex programs however I would suggest that the corporate RSO would be the appropriate conduit for communication with the applicant authority, just as they are for all CNSC related communications.

This should also apply in the case of signing authority as the corporate RSO is capable of ensuring that the whole program is suitably equipped etc where as a site RSO will not have that information.

It is also unfeasible for a site RSO to modify the policies within the program wide radiation safety manual. It is agreed however that they should be able to recommend changes to these policies through their corporate RSO / Radionuclide Safety Committee

etc. and they should have the authority to modify local / site policies and procedures as required.

With regards to section 3.6.1, there should be definitions for what is considered a short or long term absence, in terms of period of time away from work as well as nature of absence. Alternatively, the CNSC should provide direction that it is up to licensee's to determine appropriate definitions for their program. With at least five site RSO's, a corporate RSO and his assistant all having up to six weeks of standard vacation time, I am sure our project officer does not want to be informed of every single vacation that every person takes. It is however acknowledged that RSO coverage in the case of any absences, and training of those alternates is important.

With regard to section 5.2 and assessment of the RPP, it is suggested that a clear distinction is made regarding guidelines and requirements that relate to internal inspections as opposed to other assessments, and also whether the term self-assessment is referring specifically to internal inspections or includes other types of assessment as well.

Section 5.2 appears to be contradicting itself, suggesting in paragraph four that assessments should take place every five years, and then in section 5.2.1 suggesting a minimum frequency of annually (with regard to self-assessments).

With regards to section 5.4, I feel that in a complex radiation protection program and organization it is impractical for the RSO and applicant authority to sign and date each policy. Documentation; its review and version control are agreed to be very important however the CNSC should be mindful of the processes that are involved in producing program wide radiation safety manuals for complex programs. In our program policies are reviewed by appropriate stakeholders, edited and approved by the executive members of the Radionuclide Safety Committee including the Corporate Radiation Safety Officer and the original of any approved policy is signed by the CEO according to our corporate policy.

Sincerely,



Samantha Eustace MSc, MCCPM
Chair
Shared Health Radionuclide Safety Committee