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**From:** Fleming, Jeff <personal information redacted>  
**Sent:** January 29, 2020 3:42 PM  
**To:** Consultation (CNSC/CCSN)  
**Subject:** Draft REGDOC-1.6.2 Comments  
**Attachments:** REGDOC-1\_6\_2 Consultation - Golder.pdf

Hi,  
Please find attached comments on RegDoc-1.6.2

Thank you,  
Jeff

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January 29, 2020

Canadian Nuclear Safety Commission  
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Ottawa, Ontario, K1P 5S9

**COMMENTS ON PROPOSED REGDOC-1.6.2**

Thank you for the opportunity to comment 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.

Our feedback is provided below:

Item	Section	Para.	Excerpt	Comment
1	2	2	RSO is the designation commonly assigned to a radiation safety specialist who administers an RPP on a day-to-day basis.	Consider clarification as a radiation safety specialist is not a defined/recognized profession and this may lead to confusion on who is suitable or not.  Also, low risk use types, e.g., an XRF may not require specialized expertise in radiation but a competently trained individual for the licence activities.
2	2	3	The applicant authority <b>should</b> ensure that sufficient resources are allocated to the RSO...	Consider changing "should" to "must"
3	3.1	1	The applicant authority <b>should</b> 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.	Consider changing "should" to "must"
4	3.3	2	The RSO is encouraged to make use of accreditation programs for RSOs which provide qualifications for the ...	Suggest changing to "where accreditation exists". If this is meant to refer to training where there is no accreditation, consider providing link to providers (with the understanding this may not equate to endorsements).

5	3.5	2	The frequency and extent of the refresher training should be determined, defined and documented.	<p>This requirement for refresher level training appears more prescriptive than requirements in Sections 3.3. and 3.4.</p> <p>Additionally, it is suggested radiation professionals [e.g. CRPA(R)] who have mandated professional development be recognized for general refresher activities.</p> <p>Lastly, opportunity to increase clarity because the "frequency" is asked to be determined and defined in paragraph 2 but paragraph 3 states a minimum of 5 years.</p>
6	3.6	1	As a result, a designated alternate RSO is necessary during an RSO's <b>temporary</b> absence.	Please define "temporary". Ideally with respect to absences in 3.6.1
7	3.6	2	... <b>should</b> be available while licensed activities are being performed.	<p>This "should" appears to contradict paragraph 1 where an "alternate" is required.</p> <p>Practically, from a program control perspective, there always needs to be someone knowledgeable at the RSO level available. Suggest this is changed to "must"</p>
8	3.6.1	2	For <b>short-term...</b> and <b>...long-term</b> absences...	Please define terms in number of days
9	3.6.1	3	...the alternate RSO <b>must</b> have the same level of knowledge about and training on the licensed activities and the regulatory requirements as the RSO.	Suggest changing "must" to "should". For many low or even medium risk types, a working knowledge of the radiation protection program or radiation safety manual, should suffice to maintain the program until an RSOs return.
10	5.3	2	...events are determined to be systematic (e.g., <b>recurring</b> action level exceedances)	Appears to contradict RPR 6 (2)c which implies every action level exceedance is reportable, not just "recurring"

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

Regards, <sup>r</sup>



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Radiation Safety Officer