

From: Barbara Monk Feldman
Sent: December-03-15 8:44 PM
To: information / info (CNSC/CCSN)
Subject: Re: Extension of deadline to comment on REGDOC-2.2.4, Fitness for Duty

Dear Sir, Dec. 3, 2015

I am submitting my comment for your recent proposal concerning 'Fitness for Duty' guidelines and guidance for workers at high security nuclear sites in the province of Ontario.

I urge you to consider the words of Albert Einstein who said that with the nuclear age 'everything has changed, but everyone is acting as though nothing has changed.' Along these lines, although your organization, the CNSN has maintained a high level of safety record, may I remind you that nothing is perfect and that even a small accident, along with the occasional releases of nuclear radiation which cumulate over time, will result in permanent contamination of earth and water in southwestern Ontario.

I urge you to consider the words of scientist Joe MacInnes (CBC 'Ideas') who maintains that assumption is the mother of everything that could go terribly wrong.

I urge you to refrain from unproven long term faith in the science of nuclear industry, and to begin investing in sustainable energy immediately.

Sincerely,
Barbara Feldman
Guelph, Ontario

On Thu, Dec 3, 2015 at 10:08 AM, <info@cnsccsn.gc.ca> wrote:
The Canadian Nuclear Safety Commission (CNSC) has extended the consultation period for REGDOC-2.2.4, Fitness for Duty, until March 7, 2016.

REGDOC-2.2.4, Fitness for Duty, provides fitness-for-duty requirements and guidance for workers at “high-security sites” as defined in the Nuclear Security Regulations. The document includes requirements for drug and alcohol testing and incorporates RD-363, Nuclear Security Officer Medical, Physical, and Psychological Fitness. Medical, psychological and occupational fitness requirements are now also required of workgroups outside of nuclear security. Fitness for Duty builds upon discussion paper DIS-12-03, Fitness for Duty: Proposals for Strengthening Alcohol and Drug Policy, Programs and Testing, which was published for public consultation from April to August 2012. REGDOC-2.2.4, Fitness for Duty also updates the information found in RD-363.

REGDOC-2.2.4, Fitness for Duty: Managing Worker Fatigue, is being consulted upon separately

and its subject matter is not addressed in this broader document.

For more information on REGDOC-2.2.4, see the news release:

<http://news.gc.ca/web/article-en.do?nid=1019589>