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**From:** Jeff Dovyak [personal information redacted]  
**Sent:** June 5, 2020 8:59 AM Consultation (CNSC/CCSN)  
**To:** Samantha Eustace; Petr Kresta; Daniel Lapkoff; 'Samantha Eustace'  
**Cc:** Comments on Comments Submitted for Draft REGDOC-1.6.2  
**Subject:** Draft REGDOC-1.6.2 Comments on Comments DOVYAK .pdf; ATT00001.txt;  
**Attachments:** ATT00002.htm

My comments on comments submitted on Draft REGDOC-1.6.2 are attached.

**Jeff Dovyak RTNM, CRPA (R)**

**Radiation Safety Coordinator | Radiation Safety Program | Diagnostic Services**

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05 JUN 2020

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

Dear Sir/Madame:

**RE: Comments on Comments submitted for Draft REGDOC-1.6.2 Developing and Implementing Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences**

Thank you for the opportunity to comment on comments submitted for this draft REGDOC. The majority of submitted comments seem to have many similarities.

Cancer Control Alberta has as usual submitted a well-thought out document and I heartily endorse Mr Beniston's comments #s 5 & 6. However, I do not agree with comment # 7 which suggests a short-term absence be considered less than 60 days.

Although it was not what I thought of in terms of notifications for short-term absences, I do not disagree with comment # 9 submitted by CNA, CNL, OPG, Bruce Power and NB Power and could accept that suggestion.

Unfortunately, I must disagree with Mr Baldomar of AM Inspection Ltd comment # 5, seven days is **too short** since most RSOs in my organization take two if not three weeks of vacation (i.e. fourteen or twenty-one days) at one time.

Thank you again for the opportunity to comment on comments submitted for draft REGDOC-1.6.2.

Sincerely,

*J. Dovyak*

Jeff Dovyak RTNM, CRPA (R)  
Radiation Safety Coordinator