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**Written submission from the
Canadian Radiation Protection
Association**

**Mémoire de l'Association
canadienne de radioprotection**

**Regulatory Oversight Report on the
Use of Nuclear Substances in
Canada: 2018**

**Rapport de surveillance
réglementaire sur l'utilisation
des substances nucléaires au
Canada : 2018**

Commission Meeting

Réunion de la Commission

November 7, 2019

Le 7 novembre 2019

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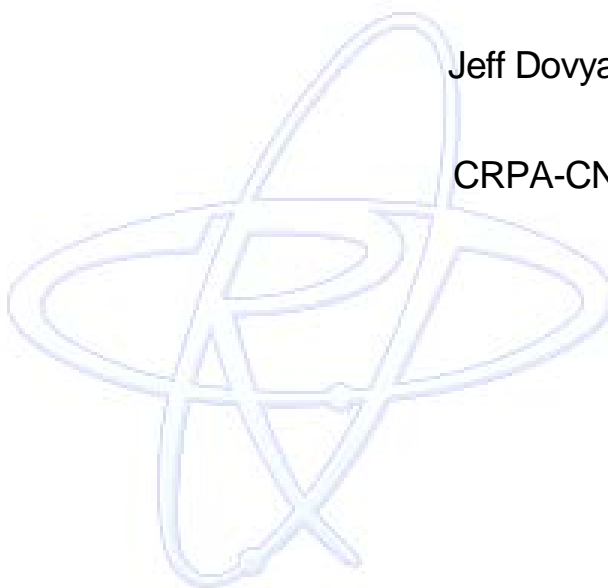
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CRPA COMMENTS

Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2018

Submitted by:

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CRPA Co-Chair
CRPA-CNSC Working Group
30 SEP 2019





WHO WE ARE

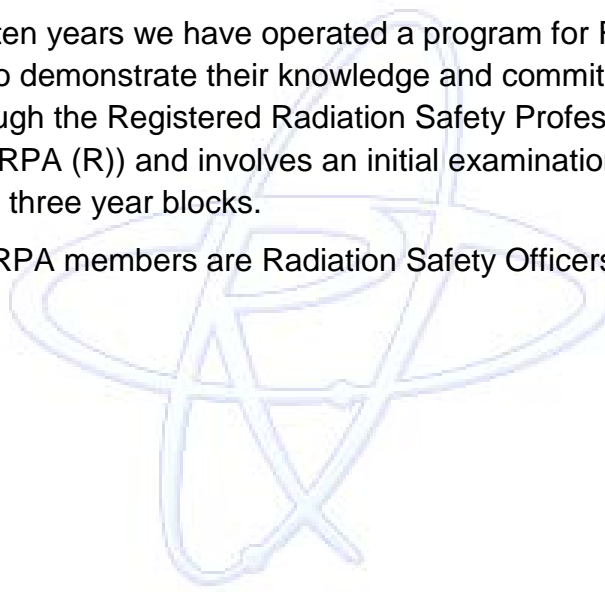
The CRPA strives to ensure the safe use of radiation by providing scientific knowledge, education, expertise and policy guidance for Radiation Protection.

The CRPA was founded in 1979 and currently represents almost three hundred (300) Canadians involved with Radiation Protection.

There are a number of Radiation Protection organizations around, CRPA is a Canadian organization!

For more than ten years we have operated a program for Radiation Safety Professionals to demonstrate their knowledge and commitment to Radiation Protection through the Registered Radiation Safety Professionals Program (credential is CRPA (R)) and involves an initial examination with registration maintenance in three year blocks.

While not all CRPA members are Radiation Safety Officers (RSOs), many are.





COMMENTS

Internal stakeholders polled in preparing our comments included:

- CRPA members of the CRPA-CNSC Working Group that was formed in 2014
 - Trevor Beniston, Stéphane Jean-François, Jeff Dovyak
- CRPA President.

General Comments

The 2018 ROR does not seem to have been explicitly posted on the CNSC website, rather it was located as a Commission Member Document in the 'meeting downloads' section.

While the number of appendices attached to the 2018 ROR make it very comprehensive, the document is still somewhat cumbersome and unwieldy.

Section 2.2 – Safety Performance measures

The fifth paragraph states that performance in the packaging and transport SCA is not explicitly covered – we still believe that there are compliance concerns with Class 7 TDG and that this SCA should be explicitly addressed (same comment last year).

Three of five common non-compliances for portable gauge licensees (ROR page 22) are transport related so we are really mystified why the Packaging and Transport SCA seems to get short shrift.

Section 4.4 – Radiation safety officers

We remain hopeful that REGDOC-1.6.2 will have a positive effect on the performance of licensees.

Section 5.2 – A strategy to improve performance in nuclear medicine

We are taken aback by Figure 9 on page 24, not that it is incorrect but by the visual impact it has on displaying worsening performance in nuclear medicine. The CRPA members of the CRPA-CNSC Working Group are most willing to consider how they can assist CNSC staff in this area.

Perhaps consideration should be given to CNSC staff offering additional outreach sessions to medical RSOs.



If non-compliances are being corrected during CNSC inspections are they recurring during the next inspection or being observed with other discrete licensees? It might aid in understanding if the most common non-compliances were highlighted.

Section 6.1 Doses to workers

With regard to skin doses we do not see any information on possible internal intake of nuclear substances, nor have we seen such information in the past few reports that have highlighted significant skin contamination incidents. Where are the Internal Dose Assessments? For the I-131 skin contamination incidents are we to assume that Thyroid Screening was performed and was negative?

Section 6.3 – Enforcement Actions

With performance worsening in the medical sector it is interesting that the industrial sector seems to be most subject to enforcement actions. Outsiders might develop the perception that CNSC is “soft” on medical sector licensees (two of the three CRPA members on the CRPA-CNSC Working Group are medical RSOs and would dispute that perception, DNSR staff are certainly not “soft” on our organizations). This misperception can fester and corrections to it could become very difficult to ameliorate.

Section 6.4 – Reported Events

While the summary of reported events in Appendix E of the ROR is helpful, along with INES classification, Radiation Safety professionals in Canada would find on-line, CNSC-published “NRC-style” event reports to be even more helpful as noted in our comments on the 2016 and 2017 RORs.

We concede that RSOs could review Appendix E, identify incidents relevant to their sector and then try to obtain more information but that is a lot of work for the individual RSO, especially for an incident that occurred the previous year.



Section 7 - Stakeholder Engagement

As stated in our comments to the 2017 ROR, CRPA members continue to find CNSC outreach sessions very worthwhile and CNSC presentations and participation at our annual conference priceless.

The *DNSR Newsletter* is another good tool for maintaining stakeholder engagement, and as noted in our comments to the 2016 and 2017 RORs, increasing publication frequency is desirable.

WebEx is a tool that has allowed collaboration in several sessions such as those dealing with Dose to Lens of the Eye, that collaboration has been between Health Canada, CNSC and CRPA and has allowed interested practitioners to participate remotely, those sessions were in 2018, 2019 with another one tentatively planned for 2020.

Section 8.9 - Regulatory focus in 2019

The 6th bullet point in this section lists regulatory documents that were published for public comment on 2018, the 2nd sub-bullet identifies REGDOC-2.5.6 *Design of Nuclear Substance Laboratories and Nuclear Medicine Rooms* as one of the REGDOCS posted for public comment in 2018 but in the “Regulatory Documents” portion of the CNSC website, as of 10 SEP 2019, REGDOC-2.5.6 is identified as not yet developed, see <http://www.cnscc.gc.ca/eng/acts-and-regulations/regulatory-documents/index.cfm> . This was communicated to DNSR staff 11 SEP.

COMMENDATIONS

The on-going ability of interested parties to watch Commission Meetings or Commission Hearings via webcast remains incredibly helpful to licensee staff, both for gaining an increased appreciation of CNSC expectations as well as in gathering Operating Experience.

We wish to acknowledge our appreciation for CNSC staff involvement with stakeholder engagement generally but specifically for the on-going participation in our annual conference and involvement with CNSC-Industry Working Groups.

Thanks to the CRPA Secretariat for formatting this report.