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**Written submission from the
Canadian Environmental
Law Association**

**Mémoire de l'Association
canadienne du droit de
l'environnement**

**Regulatory Oversight Report on the
Use of Nuclear Substances in
Canada: 2020**

**Rapport de surveillance
réglementaire sur l'utilisation
des substances nucléaires au
Canada : 2020**

Commission Meeting

Réunion de la Commission

November 23, 2021

Le 23 novembre 2021



Canadian
Environmental Law
Association
EQUITY. JUSTICE. HEALTH.



**SUBMISSION BY THE CANADIAN ENVIRONMENTAL LAW ASSOCIATION
TO THE CANADIAN NUCLEAR SAFETY COMMISSION REGARDING THE
REGULATORY OVERSIGHT REPORT ON THE USE OF NUCLEAR
SUBSTANCES IN CANADA: 2020**

October 25, 2021

**Prepared by:
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I. INTRODUCTION

This intervention is filed in response to the Canadian Nuclear Safety Commission’s (“CNSC”) Notice of Participation at a Commission Meeting and Participant Funding dated July 5, 2021¹ concerning the presentation of the *Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2020* (herein “ROR”).² A virtual meeting with respect to this matter is scheduled for November 24-25, 2021.

The Canadian Environmental Law Association (“CELA”) received participant funding to review this ROR. Our review focused on matters related to the Safety and Control Area (SCA) of environmental protection, the sufficiency of data and analysis provided by CNSC Staff in support of their conclusions, and the adequacy of public engagement including disclosure of information enabled by the ROR process. Our findings are set out below, accompanied by either requests or recommendations to the Commission and CNSC Staff. A summary of recommendations is included in **Appendix 1**.

Expertise of the Intervenor

The Canadian Environmental Law Association is a non-profit, public interest law organization. For over 50 years, CELA has used legal tools to advance the public interest, through advocacy and law reform, in order to increase environmental protection and safeguard communities across

¹ CNSC, Notice of Participation at a Commission Meeting and Participant Funding (Ref. 2021-M-02) 5 July 2021.

² CNSC, Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2020 (CMD 21-M35) 9 September 2021 [ROR 2020].

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Canada. CELA is funded by Legal Aid Ontario as a specialty legal clinic, to provide equitable access to justice to those otherwise unable to afford representation.

CELA has an extensive library of materials related to Canada's nuclear sector which is publicly available on our website.³ CELA has engaged in detailed research and advocacy related to public safety and environmental protection by seeking improvements to the oversight of Canada's nuclear facilities and sites. CELA has previously provided submissions to the Commission on its range of RORs. These prior submissions and other materials related to nuclear oversight and licensing are publicly available on our website.

II. FINDINGS

In response to the 2020 ROR, CELA raises a number of issues relating to the adequacy of CNSC Staff's review and sufficiency of discussion related to environmental protection, radiation exposure and international obligations. CELA's findings draw on previous years' RORs and where applicable, highlight oversight actions which are unfulfilled or in need of a status update. CELA **submits** the Commission should require CNSC Staff to remedy the deficiencies, outlined below, and draft an addendum to the current ROR.

A. Depth and Scope of Review

CELA has reviewed the ROR in detail and finds it is significantly more brief than prior RORs on the same topic. Excluding Appendices, the nuclear substance ROR in the past five years has had the following lengths:

- 2020 ROR (current): 12 pages
- 2019 ROR: 9 pages
- 2018 ROR: 48 pages
- 2017 ROR: 94 pages
- 2016 ROR: 84 pages

While we recognize that much of the information formerly contained in the body of the report is now captured in Appendices, a side-by-side comparison of like sections demonstrates that this year's ROR lacks the description and context provided in the 2018 ROR and versions prior. For instance, while each sector (e.g. medical, industrial, academic and research, and commercial) were formerly described in the body of the report,⁴ this year's report omits this context and only provides tables tracking inspection ratings and doses to workers by sector.⁵

³ Canadian Environmental Law Association, online: www.cela.ca.

⁴ CNSC, "Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2018" (4 September 2019) p 18 – 21 [**ROR 2018**].

⁵ ROR 2020, Appendix B.5, pp. 24 – 30.

CELA has made the same comment in previous years with regard to the 2018 and 2019 RORs, however, our comments were not addressed during the 2019 Commission Meeting and our concerns remain the same, namely that the additional information was included in past versions of the ROR because it was deemed relevant and necessary to the deliberations of the Commission and to allow the public a reasonable opportunity to review oversight activities related to the use of nuclear substances. It would seem that the CNSC has since changed its view on what information should be included in the ROR. CELA also notes that, the less supporting information provided in the ROR, the less likely it will be that the public can fully assess the foundation of the CNSC's conclusions in the ROR. And in turn, the less is achieved by making these reports available for consideration by the public.

In furtherance of the CNSC's mandate to disseminate objective scientific, technical and regulatory information to the public,⁶ CELA **recommends** greater detail be provided in the body of the report, including descriptions of the nature of the regulated sector and its particular use of nuclear substances. Further, as nuclear substances do not undergo public licensing hearing processes, there is an even greater role for the ROR in providing the public with detailed information and context in support of conclusions reached.

In addition to the decrease in detail contained in this year's ROR, it is also narrower in scope. For instance, the 2019 ROR was divided into two parts:

- Part I: Use of Nuclear Substances in Canada: 2019
- Part II: Class IB Accelerators in Canada: 2018-2019

However, the 2020 ROR no longer addresses Class IB Accelerators in Canada. This lack of consistency in terms of the content of the ROR makes it very difficult for the public to follow and understand the purpose of the ROR. This also makes it challenging for the public to know what the trends are and how to compare the data from year to year. CELA **recommends** that this change be explained at the upcoming ROR meeting and that changes to scope and format be expressly explained in the text of the ROR.

In early 2021, the CNSC conducted a public consultation on the ROR process⁷ but they have not yet released a report summarizing the feedback as they typically do⁸. During the consultation process, CELA requested that the CNSC review all of our past comments within past ROR submissions and incorporate them into their report. This consultation was not addressed in the 2020 ROR. CELA **requests** that an update on the ROR discussion paper consultation process be provided at the upcoming Commission Meeting. For instance, what was said by the public about the ROR process? How was this reflected in this year's ROR? What is the timeline for ROR reform?

⁶ *Nuclear Safety and Control Act*, s 9(b).

⁷ https://www.letstalknuclearsafety.ca/discussion-paper-the-cnsc-regulatory-oversight-report-review?tool=forum_topic#tool_tab

⁸ See for instance, <https://nuclearsafety.gc.ca/eng/acts-and-regulations/consultation/completed/dis-16-04.cfm>

CELA further **recommends** that, for matters where CNSC Staff have committed to undertake a review or reform in the coming year, updates of the project's status should be a required component of the subsequent year's ROR.

Recommendation

1. Greater detail, including the nature of the regulated sector and its particular use of nuclear substances, should be provided in the body of the report. As nuclear substances do not undergo public licensing hearing processes, the ROR is an opportunity to provide the public with information specific to nuclear substance licensees, and the CNSC's oversight actions and findings.
2. The removal of a discussion about Class IB Accelerators from the 2020 ROR should be explained at the upcoming ROR meeting.
3. The CNSC should provide an update on the ROR discussion paper consultation process at the upcoming Commission Meeting.
4. For matters where CNSC Staff have committed to undertake a review or reform in the coming year, updates of the project's status should be a required component of the subsequent year's ROR.

B. Compliance Performance

The ROR includes information on the overall compliance rate of inspected licensees within four of the fourteen established safety and control areas ("SCAs"), including the management SCA (96%), the operating performance SCA (83%), the radiation protection SCA (84%) and the security SCA (93%). While these SCAs have been prioritized in the ROR, CELA **recommends** at least including the compliance percentages for the remaining SCAs to allow the public to gain better insight into the overall performance of licensees. In this regard, CELA finds the following passage in the ROR of particular importance:

During licensing and compliance activities, CNSC staff review the licensee's performance within each relevant SCA by reviewing licensee documents and conducting inspections. Owing to the broad nature of the different activities conducted by the licensees covered, not all SCAs apply to all activities or all licensees. All relevant SCAs are assessed during compliance inspections and reviews of licensees' documents, and a compliance rating is assigned for each SCA.⁹

From this passage, it is evident that the necessary performance data is already compiled and assessed by the CNSC. It is also clear that this data is considered important by the CNSC, since

⁹ ROR 2020, p. 4.

compliance ratings are assigned for each SCA. Yet apparently for reasons of simplicity, this data is excluded from the purview of the Commission and public. CELA **recommends** this be remedied in next year's ROR and an update be provided at the ROR meeting in November 2021.

Recommendation

5. Compliance percentages for all Safety and Control Areas should be included in the ROR to allow the public to gain better insight into the overall performance of licensees.

C. Environmental Protection

The ROR makes the following comment about the Environmental Protection SCA:

The waste nuclear substance licences included in this report are covered within the commercial sector, and are the only licensees presenting performance data for the environmental protection and conventional health and safety SCAs. This is because, unlike the nuclear substance licensees, waste nuclear substance licensees have the potential for environmental releases as well as a potentially higher risk in the area of conventional health and safety.¹⁰

This clearly presents a narrower understanding of the Environmental Protection SCA, contrary to the CNSC's environmental protection framework set out in REGDOC-2.9.1, which in Section 2.2. requires consideration of not just radioactive substances, but rather of *all* hazardous substances and effects on the environment:

The CNSC's environmental protection safety and control area (SCA) covers measures that identify, control and monitor all releases of radioactive and hazardous substances and effects on the environment from facilities or as the result of licensed activities.

As such, CELA continues to **recommend** that the Environmental Protection SCA be included in the ROR for all sectors. During the 2019 Commission Meeting, the CNSC addressed this recommendation in part, noting that "The SCAs used in the ROR are selected because they are the most indicative of overall safety. Presenting all SCAs would significantly increase the size of the ROR, which risks making it less accessible."¹¹ The CNSC has an obligation to provide the public with objective scientific, technical and regulatory information about the use of nuclear substances in Canada, and this includes any potential impacts on the environment. This responsibility cannot be neglected simply because inclusion of more information would increase the size of the ROR.

¹⁰ ROR 2020, p. 3.

¹¹ Transcript of November 5, 2020 Public Commission Meeting, p. 78.

In other words, absent data, findings and an intelligible rationale, which examine the overall environmental impact of licensees as required in REGDOC 2.9.1, a statement which concludes certain acts are *not* impactful is not sufficient. With this in mind, and given the purposes of the Commission's mandate per sections 3 and 9 of the *Nuclear Safety and Control Act*, CELA **recommends** this matter be discussed at the upcoming ROR meeting and the ROR updated by way of addendum, to set out how the environmental protection threshold per REGDOC 2.9.1 is fulfilled.

With regard to the Environmental Protection SCA, the ROR states that there were “2 unplanned releases to the environment as a result of licensed activities in 2020”, however, as these were below unconditional clearance levels and the licensees' action levels, the releases had no impact on the environment. CELA **requests** information on the nature and size of these releases. CELA also **recommends** including a detailed description of these events in the ROR.

The ROR makes the following general conclusion about the Environmental Protection SCA:

Resulting from the CNSC's comprehensive regulatory oversight of the industry, the evaluations of findings for the SCAs demonstrates that licensees made acceptable provisions to protect health, safety, security, and the environment from the use of nuclear substances and prescribed equipment, and took the measures required to implement Canada's international obligations.¹²

Unfortunately, the ROR does not build on this conclusion and contains little to no discussion of licensee measures taken to protect the environment. In other words, the ROR omits any discussion or data to support the above noted conclusion.

Lacking analysis and the supporting references, CELA **submits** the ROR does not contain sufficient information to allow the report to conclude that licensees made acceptable provision to protect the environment. While it is possible that licensees may be in compliance, the ROR contains insufficient information for the public to determine on what basis this is the case. As we have previously expressed, CELA strongly urges incorporating reasonably detailed information regarding environmental protection in next iterations of the ROR.

Recommendations

6. The Environmental Protection SCA should be included in the ROR for all sectors, and all hazardous substances and effects on the environment should be considered.

¹² ROR 2020, p. 12.

7. The upcoming ROR meeting and the ROR should be updated by way of addendum, to set out how the environmental protection threshold per REGDOC 2.9.1 is fulfilled.
8. Information should be provided in the ROR which describes the nature and size of the two unplanned releases to the environment as a result of licensed activities in 2020. This information should be presented at the upcoming ROR meeting.
9. Conclusions in the ROR specific to various safety and control areas, including that for the Environmental Protection, should be supported by information setting out on what basis the finding is made.

D. Inspections

Inspections and other compliance verification activities are an important tool in ensuring protection of the environment. Thus, in response to this year's ROR and findings made during last year's nuclear substance ROR meeting, CELA raises the following matters for the Commission's consideration.

First, the number of total inspections has continued to decrease over the past five years. In 2015 a total of 1,568 inspections were carried out. In 2016 the number of inspections decreased to 1,452. In 2017, this dropped further to 944 inspections, while 2018 saw a slight increase up to 949 inspections. In 2019, a total of 863 inspections occurred.¹³ In 2020, the total number of inspections dropped significantly to 371 inspections.¹⁴ While much of this decrease can be attributed to the COVID-19 pandemic, the ROR states that the original (pre-pandemic) plan only called for a target of 750 inspections, which is still a drastic decrease from 2019.¹⁵ CELA **requests** CNSC Staff provide an explanation for this planned decrease at the ROR meeting. Further, we **recommend** subsequent RORs provide greater trend analysis and reporting of inspections spanning a 5-year timeframe and explain any reductions or increases in the inspection targets compared to previous years.

In the context of compliance efforts during the pandemic, the ROR provides the following statement:

[...] CNSC staff recognize that conducting a reduced number of annual inspections is not sustainable going forward. There is a potential for licensee performance to decrease if not inspected regularly. In addition, reduced compliance performance information that would typically be gathered during on-site inspections would eventually impact CNSC staff's ability to make risk-informed licensing decisions. As such, staff are currently focused on

¹³ ROR 2019, p 2.

¹⁴ ROR 2020, p. 4.

¹⁵ ROR 2020, p. 4.

re-calibrating the CNSC’s regulatory oversight of nuclear substances licensees by steadily increasing the number of on-site inspections as vaccination rates rise and the risks from COVID-19 continue to decline.¹⁶

CELA **requests** that more information be provided on the CNSC’s plan to increase the number of on-site inspections and deal with potential reduced compliance performance issues.

Second, the ROR does not disclose the inspection process or methodology which details how inspections occurred. CELA **recommends** that at a minimum, the ROR set out the objectives and scope of inspection criteria, and detail methods used to track and report compliance of nuclear substance licensees. Relatedly, less than a quarter of all nuclear substance licences were inspected.¹⁷ Thus, the SCA compliance ratings are based on the number of licensees inspected and not *all* licensees. It is critical that the ROR contain a transparent and well documented methodology so that compliance ratings, which are based on some but not all licensees, provide an accurate reflection of compliance within the four nuclear substance sectors.

Third, as submitted for last year’s nuclear substance ROR meeting, CELA requested information pertaining to the allocation of CNSC inspection resources. In response, CNSC staff indicated at the ROR meeting that their “the criteria for inspections is already predetermined, whether they are unannounced or announced” and that “the outcome of the inspection is not really affected whether the inspections are done announced or unannounced.”¹⁸ This is different from what CNSC staff indicated during the 2018 Commission Meeting, where they set out the differences between announced and unannounced inspections and the varying levels of compliance which could be anticipated (with unannounced inspections resulting in greater findings of minor non-compliances compared to those which were announced).¹⁹ CELA **requests** clarity on this issue and **recommends** that the CNSC begin tracking this characteristic of its inspections in the ROR.

CELA, having been involved in prior RORs, has been tracking the promises and comments made, and this is just one issue that underscores the lack of continuity between years and the need to more closely track and report on commitments/requests made of the Commission to CNSC Staff.

Fourth, despite the CNSC’s commitment to increasing inspections of medium-risk licensees in 2019, the 2020 inspection plan continued to focus on the highest-risk category of licensees. In response to last year’s ROR, CELA requested the following information:

- What percentage of total licensees inspected are medium risk

¹⁶ ROR 2020, p. 7.

¹⁷ There are a total of 2,079 licences and 371 inspections occurred, ROR 2020, pp. 3, 11.

¹⁸ Transcript of November 5, 2020 Public Commission Meeting, p. 86.

¹⁹ Minutes of the Canadian Nuclear Safety Commission (CNSC) Meeting Held on November 6–7, 2019, para 101.

- How the total number of medium risk licence inspections compares to the total number inspected last year

At the 2019 Commission Meeting, CNSC staff indicated that they would refocus their priorities and resources in light of their previous commitment “to really dive into the medium risks and some of their performances as well.”²⁰ This year, CELA reiterates its concerns that medium-risk licensees have been left out of proper oversight for a number of years and this may lead to increased non-compliance. CELA **requests** information as to what, if any, inspection areas or activities have been given lower priority to allow for the increased focus on medium risk-licensees in 2021. This should include a description of whether further resources have been allocated and/or whether a systematic approach is being taken to this problem.

CELA **submits** that answering these two questions is critical, not only to track CNSC Staff’s commitment to increase medium risk inspections, but to ensure the validity of the 2019 ROR’s report that declines in some SCAs (ie. operating performance and radiation protection) “may be due to prioritizing medium risk licensees that were overdue for inspection.”²¹

This year’s ROR states that CNSC staff issued 4 orders and 2 Administrative Monetary Penalties (“AMPs”) to licensees as a result of inspections. Table 17 in Appendix C includes a list of orders issued and licensee response, but no details about what events triggered the orders or any details about the orders themselves. Table 18 includes a description of the events that triggered the issuance of AMPs. This level of detail is insufficient for the public to determine whether these enforcement measures are adequate. CELA **recommends** briefly mentioning the types of orders issued and providing a description of the events that triggered the orders or AMPs.

Recommendations

10. RORs should discuss changes in inspection targets and provide greater trend analysis, such as reporting of inspections spanning a 5-year timeframe, to better explain decreases in inspection levels.
11. Information should be provided regarding the CNSC’s plan to increase the number of on-site inspections and deal with potential reduced compliance performance issues as a result of the COVID-19 pandemic.
12. To add credibility to the conclusions reached in the ROR, the report should set out the objectives and scope of inspection criteria, and methods used by CNSC Staff to track and report compliance of nuclear substance licensees.

²⁰ Transcript of November 5, 2020 Public Commission Meeting, p. 92.

²¹ ROR 2019, p. 3.

13. Information should be provided regarding whether or not the outcomes of inspections differ when the inspection is announced or unannounced. At the very least, the CNSC should begin tracking this characteristic of its inspections in the ROR.
14. Information should be provided as to what, if any, inspection areas or activities have been given lower priority to allow for the increased focus on medium risk-licensees in 2021.
15. The ROR should provide a description of the events that triggered orders and AMPs to be issued, in addition to a description of the types of orders issued.

F. International Obligations

The conclusion section of the ROR includes the following general conclusion in relation to compliance with international obligations:

Resulting from the CNSC's comprehensive regulatory oversight of the industry, the evaluations of findings for the SCAs demonstrates that licensees made acceptable provisions to protect health, safety, security, and the environment from the use of nuclear substances and prescribed equipment, and took the measures required to implement Canada's international obligations.²²

A similar general statement was included in last year's ROR and the 2018 ROR, prompting CELA to **request** that the ROR reference the key international standards as well as obligations guiding licensing requirements and discuss how this is communicated to licensees. This remains an outstanding issue. CELA **submits** that general statements in the ROR, which are neither substantiated nor given greater context, are not helpful in accomplishing the aims of the ROR, which should be to publicly report on compliance in a discernible way. CELA further **submits** that the ROR provides an annual opportunity to highlight new international standards or changes to existing international standards (e.g. whether the IAEA came out with updated guidance) and report on how they were/will be considered by licensees.

Recommendation

16. The ROR should directly reference the international standards and regulatory basis (e.g. regulation or REGDOC) which supports the ROR's conclusion that licensees adequately implemented Canada's international obligations. The ROR should also set out how CNSC Staff sought to review compliance of said obligations.

²² ROR 2020, p. 12 [emphasis added].

G. Radiation Exposure to Workers

CELA has reviewed the sector-by-sector comparison of annual effective doses to Nuclear Energy Workers (“NEWS”). In response to last year’s ROR, CELA noted that Figure 11 included a new column setting out doses equal to or less than 0.5 mSv with no explanation for this change in the presentation of data. As this comment remains unaddressed in the 2020 ROR, CELA again **recommends** that this change be explained at the upcoming ROR meeting. For instance, were doses of this threshold always reported but not displayed in previous RORs? Or was a new requirement for reporting of this dose imposed on licensees? As drafted, the ROR remains unclear.

This year’s ROR provides that 3 non-NEWS reported dosimetry readings above the applicable dose limit of 1 mSv per calendar year. The ROR provides a description of each of these events but does not include any details about actions or steps taken to deal with these exposures and prevent similar events in the future. CELA **recommends** including a detailed discussion of the actions taken to deal with these incidents and the steps which will be taken to lessen exposures in subsequent years. CELA also **recommends** that information be provided about the potential long-term health risks and ways in which ongoing medical review will be provided to these non-NEWS.

Recommendations

17. The new column displayed in Figure 11 should be explained at the upcoming ROR meeting. Specifically, why this additional column has been added, its purpose and whether it will continue in subsequent RORs.
18. The ROR should include a detailed discussion of the actions taken to deal with the 3 exposure incidents involving non-NEWS in 2020 and the steps which will be taken to lessen exposures in subsequent years.
19. Information should be provided about the potential long-term health risks of the exposure incidents involving non-NEWS and ways in which ongoing medical review will be provided.

H. Reported Events

The 2020 ROR provides that 135 events were reported in 2020. All of these events are listed in Table 18 of Appendix E, which includes a brief description of the reported events. The ROR states that “For all cases of events reported to the CNSC, licensees implemented appropriate response measures to mitigate the impacts of the events and to limit radiation exposure to workers and the public. CNSC staff reviewed the measures and found them to be satisfactory.”²³ This level of detail

²³ ROR 2020, p. 10.

is insufficient because it does not provide the public with any information about the response measures taken and how they will mitigate the impacts of the events. CELA **recommends** briefly mentioning the corrective and remedial actions taken.

Recommendation

20. Corrective and remedial actions taken to address reportable events should be described in the ROR.

III. CONCLUSION

We respectfully provide these comments to the Commission to assist in its review of the *Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2020*.

Sincerely,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Krystal-Anne Roussel, Legal Counsel



Morten Siersbaek, Legal Counsel

Appendix 1

Summary of Recommendations

1. Greater detail, including the nature of the regulated sector and its particular use of nuclear substances, should be provided in the body of the report. As nuclear substances do not undergo public licensing hearing processes, the ROR is an opportunity to provide the public with information specific to nuclear substance licensees, and the CNSC's oversight actions and findings.
2. The removal of a discussion about Class IB Accelerators from the 2020 ROR should be explained at the upcoming ROR meeting.
3. The CNSC should provide an update on the ROR discussion paper consultation process at the upcoming Commission Meeting.
4. For matters where CNSC Staff have committed to undertake a review or reform in the coming year, updates of the project's status should be a required component of the subsequent year's ROR.
5. Compliance percentages for all Safety and Control Areas should be included in the ROR to allow the public to gain better insight into the overall performance of licensees.
6. The Environmental Protection SCA should be included in the ROR for all sectors, and all hazardous substances and effects on the environment should be considered.
7. The upcoming ROR meeting and the ROR should be updated by way of addendum, to set out how the environmental protection threshold per REGDOC 2.9.1 is fulfilled.
8. Information should be provided in the ROR which describes the nature and size of the two unplanned releases to the environment as a result of licensed activities in 2020. This information should be presented at the upcoming ROR meeting.
9. Conclusions in the ROR specific to various safety and control areas, including that for the Environmental Protection, should be supported by information setting out on what basis the finding is made.
10. RORs should discuss changes in inspection targets and provide greater trend analysis, such as reporting of inspections spanning a 5-year timeframe, to better explain decreases in inspection levels.

11. Information should be provided regarding the CNSC's plan to increase the number of on-site inspections and deal with potential reduced compliance performance issues as a result of the COVID-19 pandemic.
12. To add credibility to the conclusions reached in the ROR, the report should set out the objectives and scope of inspection criteria, and methods used by CNSC Staff to track and report compliance of nuclear substance licensees.
13. Information should be provided regarding whether or not the outcomes of inspections differ when the inspection is announced or unannounced. At the very least, the CNSC should begin tracking this characteristic of its inspections in the ROR.
14. Information should be provided as to what, if any, inspection areas or activities have been given lower priority to allow for the increased focus on medium risk-licensees in 2021.
15. The ROR should provide a description of the events that triggered orders and AMPs to be issued, in addition to a description of the types of orders issued.
16. The ROR should directly reference the international standards and regulatory basis (e.g. regulation or REGDOC) which supports the ROR's conclusion that licensees adequately implemented Canada's international obligations. The ROR should also set out how CNSC Staff sought to review compliance of said obligations.
17. The new column displayed in Figure 11 should be explained at the upcoming ROR meeting. Specifically, why this additional column has been added, its purpose and whether it will continue in subsequent RORs.
18. The ROR should include a detailed discussion of the actions taken to deal with the 3 exposure incidents involving non-NEWS in 2020 and the steps which will be taken to lessen exposures in subsequent years.
19. Information should be provided about the potential long-term health risks of the exposure incidents involving non-NEWS and ways in which ongoing medical review will be provided.
20. Corrective and remedial actions taken to address reportable events should be described in the ROR.