

September 4th, 2019

President Rumina Velshi

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B, 280 Slater Street
Ottawa, ON, Canada K1P 5S9

Dear President Velshi:

Re. CNSC Request for Comment on REGDOC-2.7.1 and REGDOC-2.7.2

On August 14th the Canadian Nuclear Safety Commission issued to invitations to comment on two regulatory documents, with the same deadline of September 4th for each.

According to the CNSC posting, REGDOC-2.7.1, Radiation Protection provides new requirements and guidance for the application of the Radiation Protection Regulations to ensure the protection of workers and members of the public. This regulatory document provides new guidance on the following topics: radiation protection programs; principles of worker dose control and principles of radiological hazard control.

REGDOC-2.7.2, Dosimetry, Volume I: Ascertaining Occupational Dose, sets out requirements and guidance for determining radiation dosimetry to ensure the protection of workers at nuclear facilities in Canada and making changes to dose-related information filed with the National Dose Registry.

Both notices include a note that “This document will be subject to a revision as a result of the consultation on the proposed amendments to the Radiation Protection Regulations, which are outlined in the What We Heard Report for discussion paper DIS-13-01, Proposals to Amend the Radiation Protection Regulations”.

On a related note, on August 9th, the CNSC posted a notice that feedback on comments received on amendments to the Radiation Protection Regulation were to be submitted by August 30th.

The undersigned organizations have an interest in these regulatory areas, and a concern about the health and environmental impacts nuclear facilities and about the adequacy of Canada’s regulatory framework to protect people and the ecosystems upon which they depend from anthropocentric sources of radiation. However, due to the short time frames, we have been unable to review all the related documentation and provided comments on draft REGDOC-2.7.1, Radiation Protection and draft REGDOC-2.7.2, Dosimetry, Volume I: Ascertaining Occupational Dose. We write to request a future opportunity to provide comments.

Furthermore, as noted above, these two regulatory documents will be subject to a revision as a

result of the consultation on the expected amendments to the Radiation Protection Regulations. Given this, the CNSC request for comments on regulatory documents which will be subject to further review in the near future as a result of a regulatory change is premature.

Given all of the above, we write to place on the record our interest and concern with respect to the regulation of radiation protection, and to request the following:

- A later opportunity to comment on REGDOC-2.7.1 and REGDOC-2.7.2 after the Radiation Protection Regulations have been finalized
- An extended comment period for these and other regulatory documents, including invitations to provide feedback on comments received by the CNSC; a minimum of thirty days on “feedback” should be provided, with a minimum of 120 days on draft regulations or regulatory documents
- A workshop style presentation by the CNSC on their proposed regulations or regulatory documents at the commencement of each comment period, with an opportunity to ask questions; this could be done electronically, in the form of a webinar, or “in person” if travel costs were made available

We request a response to our concerns and proposal at your earliest convenience.

Thank you for your consideration.

Sincerely

Patricia Leson, President
National Council of Women of Canada