



CNSC/ Industrial Radiography Working Group Meeting
February 10, 2016
CNSC Mississauga (SORO) Office
5800 Hurontario St. (Suite 10-75)
Mississauga, ON, L5R 4B4

Attendees

C. Moses (CNSC)
H. Rabski (CNSC)
K. Mayer (CNSC)
P. Fundarek (CNSC)
L. Simoneau (CNSC)
A. Brady (TISI)
T. Levey (Acuren) – videoconference from Calgary (WRO)
B. Bizzarri (GB Contract Inspection) - teleconference from Regina
P. MacNeil (A-Tech) - video conference from Calgary (WRO)
C. Auzenne (QSA Global) – teleconference from New Orleans, LA

Absentees

D. Hanna (SGS)
P. Larkin (CNSC)

Chair of the Meeting

K. Mayer

Co-Chair

A. Brady

K. Mayer opened the meeting at 10:15 am.

The agenda was adopted as proposed.

C. Moses welcomed everyone to the meeting and provided a regulatory update on current issues at the CNSC.

Financial Guarantees

This is year 2 of the Financial Guarantee scheme. Calculators are available on the CNSC website to help

estimate required contributions. There have been some tweaks made to the form based on feedback received and lessons learned.

Overall, it is hoped that there will be better compliance to this program this year. It was noted that full compliance was reached by August 2015.

REGDOCs

There are several new REGDOCs under development. The guide/ roadmap for interpretation of the new *Packaging and Transport of Nuclear Substances Regulations, 2015*, which is essentially a consolidation table will be published on February 18, 2016 REGDOC-2.14.1- Packaging and Transport Information Incorporated by Reference in Canada's *Packaging and Transport of Nuclear Substances Regulations, 2015*.

There is a new edition of IAEA REGDOC – updated and published version will also be available in February 2016.

Safety culture is an ongoing theme; CNSC staff members are collaborating on how exactly the REGDOC will be used. In the discussion paper, there are some key principles and guidance on how to perform personal assessments but it has not been decided how it will be implemented. REGDOC-2.1.2, *Safety Culture* is moving forward, there is a dedicated section for NPPs, and future iterations of the document will likely be more useful for smaller licensees.

The IAEA produced a good document on safety culture, there should be some similarities in the CNSC document as the IAEA are used as seed docs for CNSC REGDOCs.

REGDOC-2.5.5 *Physical Design Industrial Radiography Installations* will be a very useful guidance reference tool – will discuss later on – action item K. Mayer will provide an update.

C. Moses indicated that along with Industry, better tools need to be developed to educate the clients in order to minimize/mitigate incidents as much as possible.

REGDOC-2.9.1, *Environmental Protection* now includes a portion for facilities as well as licensed activities. This document is out for consultation, the comment period closes March 29, 2016. C. Moses encouraged Industry members to see how it affects your industry and how it may impact your work environment and provide comments. The CNSCs mandate is to protect the health, safety, security and environment; this is a way to get a better overall handle on the environment.

Safeguards

The CNSCs International Safeguards Division (ISD) is applying more controls to depleted uranium (DU). The IAEA is taking a stronger look at all of the nuclear source material including DU. This may lead to safeguards for possession. In Canada, there is a non-proliferation treaty, where quantities must be tracked to determine the true uses of the material in the world other than shielding. Some quantities are being

reported and some are not accounted for, they are considered “accidental gain”. It is somewhat political, the IAEA is trying to treat all countries the same (for example Canada and Iran) for transparency. The ISD is seeking information, a letter will be sent to all licensees signed by C. Moses to find out what is out there. This is basically to see what is out there and reduce the burden to licensees.

A. Brady asked if there would be any licence conditions for REGDOC-2.9.1 as well as for safety culture. The immediate response is CNSC is unsure as it has not yet been determined how they will be implemented for DNSR licensees.

Events Project

C. Moses provided a brief update that the project is to improve the internal management of events. CNSC staff is working on drafting a REGDOC to provide guidance to both CNSC staff and licensees. CNSC has increased the scrutiny on response and tracking of events. Ideally, a system will be developed to share operating experience amongst licensees. This is something that has been discussed for years in this working group. It was noted that there would be real value in licensees knowing what happened and lessons learned to be able to take a more proactive approach to avoid similar situations.

C. Moses will take the liberty to sign up all licensees for notifications.

Industry members mentioned that there was a discussion at a CIRSA meeting on REGDOCS vs. regulation changes. It was felt that it is the preferred method to use REGDOCS as it is a faster process and less red tape for licensees. The only concern they raised is when they are in licence conditions.

CNSC staff members noted that this has been heard before in other industry sectors. It is sometimes the only power than can be used for due diligence on the CNSCs part. There will be discussion papers and the process is very transparent and consultation is encouraged.

A regulatory impact analysis was done for regulations and is now being done for REGDOCs. Regulatory staff internal workforce management comes into play as well, less experience. There is a need for guidance internally and externally. REGDOCS are maintained and after three to four years, a good robust group of REGDOCs will be in existence.

Industry stated that they can be seen as a shortcut way to quickly implement items without following due diligence of the past. A. Brady mentioned that Industry is being consulted more and feedback requested, this is a positive sign. There are pros and cons to both programs, the REGDOCS are a more public forum.

1) Review of Minutes from Previous Meeting

The minutes of last meeting (October 7th, 2015) were reviewed. Some editorial comments (spelling) were made to correct the minutes. C. Moses will provide some further editorial comments to K. Mayer for preferred style of minutes.

With the editorial corrections stated above, the October (Fall 2015) minutes can be accepted and adopted, based on the Fist of Five approach. A motion was put forward by A. Brady to accept the corrected minutes and seconded by P. Fundarek. The minutes will be sent for translation.

2) CNSC Presentation – “The CNSC’s plan regarding the proposal to reduce the dose limit to the lens of the eye” - presentation by M. Rickard (CNSC)

M. Rickard is a Dosimetry Specialist in the Radiation & Health Sciences Division (RHSD) at the CNSC who works very closely with the Radiation Protection Division (RPD).

The presentation was delivered from Ottawa via videoconference. The presentation is in relation to the proposed amendments to the *Radiation Protection Regulations*. The focus of the talk will be on the lens of the eye. CNSC’s position is provide guidance to the licensees. The regulations were in line with the ICRP recommendation ICRP 60 (1990) which was updated in 2000. The amendments to the regulations are administrative in nature and the result of the review of several supporting operational issues identified by both CNSC staff and licensees.

A discussion paper was published in August 2013. The paper addressed all of the proposed changes and included a 120 day consultation period. Twenty sections of the *radiation protection regulations* were considered and feedback was sought from stakeholders on the proposed regulations. A “What we’ve heard report” was published to address the plan forward for the CNSC.

The bulk of the licensees that commented were the NPPs and larger facilities. There was a lack of feedback from other licensees and it was decided to provide a focused outreach.

Slide 8 – concern for the development of cataracts; proposed changes are noted on the slide; it aligns perfectly with the dose limits

Slide 9 – proposed dose limit changes for NEWs; plan is to proceed with the proposed amendments. The reason why CNSC is proceeding is explained on slide 9; it was based on epidemiology type studies. It will be implemented by 2018.

Slide 10 – technical note – technically based documents will be sent to all CNSC licensees including specifics on the plan. The information/guidance to licensees will be sent in advance of the changes.

Some licensees will be impacted more than others but it was thought it was best to send the same message to all licensees.

Slide 11 – provides an overview of the technical note; licensees will consider the information and take the steps (outlined in Slide 11)

Slide 12 – work practices undertaken to provide workers greater protection

Slide 13 – the presentation is generic in nature and will be and has been given to multiple audiences; the

hazard assessment will talk specific to IR; moreover an unplanned event, not a regular occurrence in IR

It is a regulatory requirement in the *radiation protection regulations* to ascertain doses. The current methods are acceptable and if a licensee is demonstrating compliance to the current dose limits for whole body should cover the lens of the eye.

Slide 16 – notes – RSOs will receive the technical note; it is being decided how to best deliver the note to all of our licensees. The packages will be ready this month (February 2016) and will include Q&As. CNSC staff is setting up a generic email account so that questions can be sent directly.

Industry asked when the proposed regulations will be implemented. The response is that CNSC is hoping for Canada Gazette Part 1 in the summer of 2016, but will likely not go into effect until 2017.

There is no set time for Gazette 1 (the large part of the legal drafting is covered). The process can be short (if there is not too much feedback to address or changes to the proposed regulations). The final say is with the Government in Council (GIC). 2017 is a possibility however, we are not overly optimistic.

Feedback was requested from the Industry members - A. Brady felt that it would not have a huge effect on the IR industry. M. Rickard responded that a huge impact is not predicted for the IR industry. The province of Alberta has adopted it already.

T. Levey said that they could add it to the training and awareness section of their manuals since small changes to the manual may be required with respect to the technical note.

P. MacNeil said there would be no real effect on the industry.

B. Bizzarri will add to work practices and train and make workers aware.

M. Rickard added it is not required to wear safety glasses (with lead component). This really applies to abnormal situations and unplanned events (more important considerations should be taken in these situations).

The CNSC is undertaking research projects with licensees. A discussion took place as to whether this would be beneficial to offer at the annual meeting. It was determined to have little value to the industry and agreed that C. Moses would at it to his discussion on regulatory updates.

3) Review of Action Items & Updates

The Action List produced from the previous meeting was also reviewed. Item 15(WGM) 1.2 – K. Mayer provided an update on the current status of the document (REGDOC-2.5.5 – Physical Design Industrial Radiography Installations, it was on hold for some time due to a lack of resources, however this has been resolved and the writing of the document will resume.

Since the IR industry have a continued interest in this document, it was agreed to be added to the action

list as an ongoing document until it is published.

There was good discussion on the future document and any updates will be communicated to the IRWG members. Some discussion topics:

- Why was “fixed” removed from the title?
- How will it cover non-licensees? Owners/operators?
- How do we share concerns with clients at sites? And for a variety of sites? (i.e. yard at the back of a facility)
- In some situations or sites may require a more restrictive bunker.
- Field work?!?

Action – update to be provided at IRWG meetings until consultation period and publication of document is complete.

4) Committee Membership & Terms of Reference Discussion

There has been no communication with D. Hanna; he is no longer employed with SGS and not currently working in the Industry. CNSC is unsure of what his future plans are. He has not let CNSC know officially. Since he has missed two consecutive meetings with no correspondence, he can no longer be a working group member.

This leaves a vacancy on the Industry side for a smaller company. CIRSA did a call out and D. Paynter (Buffalo Inspections – CIRSA Executive) was suggested. Not a small company. The IRWG is seeking a member from the East – bilingual representation from Quebec area would be good. The suggestion was made for D. Hebert from Mistras Services Inc.

Action – K. Mayer and L. Simoneau to follow up for Fall 2016 meeting.

P. MacNeil suggested that we add a trainer to the IRWG; she feels that this is a missing component of the group.

Members were encouraged to invite training providers to attend an IR meeting as observers. The ToR allows for anyone to come to a meeting and share information or just listen and observe.

PCP-09 Update

- Improve compliance
- Reduce dose
- Reduce incidents

Improvements have been made to the training certification process.

There are ongoing PCP-09 growing pains

- Challenges being faced
- Math equivalency
- Suggest a teleconference to liaise with trainers (Action item to come out of PCP-09)

- Q&As on syllabus
- Open invitation to participate at the annual meeting
- There are challenges within PCD (resources/staffing)

K. Mayer and H. Rabski agreed to support PCD as much as possible.

The ToR have been reviewed and accepted for 2016.

The term is 3 years in length for Industry; nomination of member and member must be endorsed by DG of DNSR.

T. Levey and A. Brady have both served two terms; however, unless they have to step down due to new people asking to join; they both would like to remain as IRWG members.

5) QSA Equipment Updates

C. Auzenne provided an update on the 1075 SCAR – approval is about 2 months out in the U.S.; then application will be made to the CNSC for approval of the device in Canada (hoping for summer 2016).

This exposure device is more popular in Europe/Asia (not as popular in North America); there is starting to be more interest in the USA.

There is an additional safety feature. There will be information to convert SCAR to conventional methods on the QSA website soon.



C. Auzenne also provided an update on the guide tube – more field work performed and QSA is confident it is a good product and is hoping to launch later in Feb 2016.

The bayonette fitting is crimped on and not threaded (one piece). The additional benefit to 880 customers (guide tube is threaded on 660s and 880s). They no longer need this option. It has been very well accepted and received by industry. It has been fully tested and QSA Regulatory department is working with Canada

The 3-hole container will be released later in February 2016. It would mainly be used for emergency

storage situations or for storage in vaults. It is not to be used for transport.

It would be very useful for servicing and source changes (which would allow training people to do their own source changes). It is designed for lower energy for Ir-192 and Se-75 but not designed to be used for Co-60.

The QSA distributor in Western Canada, (IRSS), have a device they built to store the source in and are capable of servicing 680s in the field.

C. Auzenne mentioned that the GPS deal is still in the works and a work in progress.

Some advantages and disadvantages of the SCAR 1075 were discussed:

- Dual mode
- Same penetrating abilities
- Lighter device
- Safer device
- Wheels; other functions make it idiot proof

Se-75 is almost useless to IRs in the field with thicker vessels and pipelines

C. Auzenne agreed that the 880 is the flagship of equipment world wide. There is not plan to stop making the 880s, however, the industry is changing and seeking more safety features.

There are ideas on the drawing board to develop a brother/sister of the 880; it would be nice not to have DU. QSA will focus on AS&T conferences to gather feedback and input from the Industry. The future is definitely in that direction.

Action – C. Auzenne to provide further updates on development at the next IRWG meeting.

6) 2016 Annual Spring Meeting Planning

The dates have been chosen for the spring meetings as follows:

- May 11, 2016 in Nisku, AB (location to be determined)
- May 25, 2016 in Ottawa, ON (CNSC Headquarters)

Training providers

CINDE – East

NAIT – West – they have an issue on CIRSA blog; end result they are up to date on training to PCP-09; they said they would send a copy of their syllabus to A. Brady.

Action – A. Brady to follow up

Other training providers are CWB Group (East)

It would be nice to have a presentation on what kinds of challenges they are facing with the new requirement as well as some feedback they have received from trainees. How has it been for them?

- CINDE – Ottawa meeting or CWB

Action – K. Mayer to seek contacts.

Events

Two presentations would be nice, one from CNSC on general expectations for event reporting and one from Industry (T. Levey) on reporting an incident with a focus on incident investigation and corrective actions.

Case Study Presentations from both East and West

PCD (CNSC) and NRC Canada update presentations and Q&As for IRs

A typical field inspection presentation by CNSC for CEDOs (expectations)

C. Moses suggested having a panel of CNSC staff available for Q&As (bring in other divisions on teleconference for Western meeting and can attend in person in Eastern (Ottawa)).

Trainer presentation

It was discussed that maybe it would be nice to develop a newsletter article as a summary of the informal discussion points. (May not be possible for this year but should be discussed again for 2017).

Action – K. Mayer to bring forward for 2017 Annual Meeting planning

Update on notification and unannounced inspections – this year the time frame given was 25 Jan – 29 Feb which gave substantial extra time. Some times they change jobs 3 times a day (35 – 40 hours) which can cause administrative difficulty.

A request was sent to provide all times where workers are present for 30 days. To send it in and do that every day is a big administrative burden.

A minimum of 4 hours notice is required before radiation operations can be changed. Sometimes they are unable to meet the 4 hour timeline.

H. Rabski stated that he appreciates the comments and clarity. They are not going to check on Saturdays and Sundays (inspectors do not work on these days). H. Rabski will work on the wording for the letter. Industry members were very pleased at how quick CNSC handled this situation and how H. Rabski responded immediately.

7) Wrap Up, next meeting and adjournment

Next meeting: possibly in October 2016 in Ottawa (tentative Oct 5) around the time of the presentation to the Commission of the Regulatory Oversight Report

The meeting was adjourned at 3:55 PM.

Radiography Working Group - ACTION LIST			
RWG Item #	Description	Assigned Person(s)	Status or Due Date
15WGM1.1	Bring a recorder to future meetings.	K. Mayer	Ongoing
15WGM1.2	Follow up with Regulatory Docs division for an update on the status/progress of REGDOC 2.5.5 and communicate the status to the working group until consultation/publication.	K. Mayer	Ongoing
15WGM1.6	Put a direct web link to SSTS on the Industrial Radiography page	H. Rabski	Closed
15WGM2.1	Provide an update from PCD division on the mix-ups at colleges with CEDO exams as well as status for PCP-09 scheme committee reconvening	K. Mayer	Closed
15WGM2.2	Ensure IRWG members are invited to Commission meeting for industrial report presentation	K. Mayer/ C. Moses	Ongoing
15WGM2.3	Check with Coms division at CNSC for options for videotaping, etc.	K. Mayer	April 2016
15WGM2.4	Industry (CIRSA) to check with community colleges for possible contacts for video opportunities.	A. Brady	April 2016
15WGM2.5	Reach out to licensees (Syncrude and Suncor) to see if interest in presentation at annual meeting	K. Mayer	April 2016
15WGM2.6	Provide further updates on QSA equipment	C. Auzenne	Ongoing
15WGM2.7	Coordinate with PCD to solicit feedback from CEDOs and obtain a list of vocational trainers, and dose results for the group from NDR	K. Mayer	Closed
16WGM1.1	Invite potential IRWG member to attend next working group meeting	K. Mayer / L. Simoneau	February 2017