

**CNSC/ Industrial Radiography Working Group Meeting
(Winter Meeting on February 13, 2019)
CNSC Calgary Office (WRO)
220- 4th Avenue SE, Suite 670
Calgary, AB**

Attendees:

P. MacNeil	A-Tech	
T. Levey	Acuren	
A. Brady	TISI	
P. Larkin	CNSC	
T. Madsen	CNSC	
L. Simoneau	CNSC	teleconference
A. Bouchard	CNSC	teleconference
C. Moses	CNSC	teleconference
B. Bizzarri	NDT Cloud	teleconference
E. Pouliot	Mistras Services Inc.	teleconference
S. Faille	CNSC	videoconference
K. Mayer	CNSC	videoconference
J. Sigetich	CNSC	absent
C. Auzenne	QSA Global	absent

Chair of the Meeting: K. Mayer
Co-Chair: A. Brady

K. Mayer opened the meeting at 8:30 am (MST) 10:30 am (EST). She welcomed and introduced all members, including E. Pouliot who is joining as a guest today and potential new member. She explained that due to the horrible weather in Ottawa, B. Tyler from Safeguards would not be able to give her presentation *Overview and Expectations* as she was working from home. K. Mayer will send a copy of the presentation to all members at the end of the meeting and set a time for the presentation later.

Everyone agreed to adopt the proposed agenda.

CNSC/Regulatory Updates – DNSR Management

C. Moses:

- The RP regulations are in the final stages of the drafting process and there does not appear to be any major impact on the Industrial Radiography Industry. It is difficult to predict the exact timeline; however, they should be coming out in the near future for consultation.

The amendments are further to the discussion paper published a few years ago. One interesting change following ICRP recommendation for dose limits to the

lens of the eye, reducing the limit to 50 mSv. Again, there is not really much impact on the IR Industry.

- The regulatory document REGDOC-2.1.2 Management System: Safety Culture is a good one to review and consider implementing some of the guidance information. By adopting some of the principles, it will likely help to reduce incidents and mitigate risk. Management systems expectations have evolved from QA policies and procedures used to manage an organization. Many of the principles are universally applicable.
- An evaluation of RSOs duties and functions as well as Radiation Protection Programs (RPP) has occurred and the evidence was gathered primarily from medical and academic licensees (those with organizations that are more complex) in order to develop key elements for an effective program and to ensure successful implementation of such a program.

Evidence based decisions on the program and its regulation are determined from the systematic methodology used to gather the information. A regulatory document (REGDOC-1.6.2 – Developing and Implementing an Effective Radiation Protection Program for Users of Nuclear Substances and Radiation Devices) is currently under development to provide guidance and expectations for the implementation of a successful RP program. We expect the timeframe for consultation around late summer to early fall 2019.

- The Risk Informed Regulatory Program (RIRP) is currently under review for updating. The timeline for review is every 5 years. The review includes looking at overall performance of the industry and the effectiveness of the inspection program and risk ranking. The frequency of inspections is determined from this data and may include adjusting the frequency for future years. Essentially, we are looking at how we can review past performance and leverage factors such as poor performance with increased frequency. The process is currently in the preliminary design stage and we will update as we progress. In essence, industrial radiography is a high-risk activity and it is unlikely that the ranking will change.

A. Bouchard:

- He is very happy to be a member of the Working Group and looks forward to working with everyone.

CEDO Cards

- This is not a new topic, CEDO cards now have expiry dates, those without expiry dates or old cards are obsolete and no longer valid.

A formal decision is forthcoming; in the meantime, we wish to communicate the plan of approach for CEDO cards that have no expiry dates or those that do and are expired:

- CNSC Inspectors to verify CEDO cards on site
- If the card does not have an expiry date or is the old card, they will bring attention to CEDO to immediately reapply or renew their certification

- They will request the address in order to confirm the CEDOs identity and send the information to PCD so that they can send out a formal notification to the individual.
- If there is collaboration, there is no issue; however if not, the inspector will ask for the RSOs assistance to help gather the information.
- The goal is to bring the CEDOs back into compliance with certification.
- The CEDO will no longer be able to work unsupervised until they receive their new card.
- Despite the many efforts to communicate with industry, there are still some old cards floating around in the industry due to loss of personal contact information.

T. Levey added that there has been a lot of communication through letters to the licensees and that industry is well aware that CEDOs need to be certified. There should be some form of regulatory action taken for the expired cards. P. MacNeil added that if the CEDOs card has expired then the expectation would be to shut down the operation or AMP because no longer certified. It is proof of a loss of the program and a safety issue. A. Brady agreed with both T. Levey and P. MacNeil and compared the situation to an expired driver's licence.

E. Pouliot was surprised that we are still finding expired cards out in the field.

A. Bouchard added that we are still seeing some instances for the following reasons:

- EDO didn't respond to the first call to change their card with new card with expiry date;
- Lost track of personal information to contact people;
- Accountability of licensee that CEDO maintains their qualifications.

Inspectors need guidance on what to do when they come across this situation in the field.

There was a lot of good discussion regarding this topic, which included:

- Is it possible to make the database public similar to NRCAN so everyone is able to see his or her CEDO status or that of the workers? Unfortunately, this is not possible due to the Privacy Act.
- PCD remains available by email or by phone to confirm CEDO card status.
- When the cards with expiry dates were issued, there were a couple of situations :
 - The CNSC (PCD) offered to grandfather existing CEDOs by exchanging their old cards for the new ones with expiry dates. The issue is that not everyone participated in this venture, because either personal information was not up to date and they never received the communication or possibly, they are no longer working in the field.
 - As a result, there may be several CEDOs coming up (2017-2018) for renewal, but they may not even still be working in the industry.

- There are also some old QO cards in circulation (likely very few but no way of knowing exact number).
- CEDOs cannot operate an exposure device without a valid certification; therefore, if the card is expired or they do not have one, they are now a trainee and must operate under supervision.

C.Moses said that ultimately when we look at applying enforcement tools, it must be determined which is the most appropriate one to getting the situation back into compliance. It is important to see the process through, consistently and rigorously while ensuring that training of operators is in accordance to PCP-09.

Essentially, 2018 is the first year for renewals, so now we are looking at them more closely. The process needs to alignment and is often case by case, with the goal of always bringing back into compliance. The CNSC and Industry appear to be consistent on the approach to this process.

A.Brady mentioned that in the past, the Scheme committed discussed the issue of contact information not being available. The question is whether PCD should maintain a database since they have the email address and telephone confirmation.

Some individuals are not aware that their card is expiring due to fact that many companies obtained the cards for the workers in 2013. Some workers have moved on. The fact that CEDOs are ultimately responsible for their certification was reiterated last year at the annual meeting. It is important to note that both the CEDO and the licensee are responsible since the onus is on the individual, however, the licensee should be checking when hiring a CEDO as well as keeping track of the expiration dates of those in their employ.

Is it possible for PCD to explore better communication with CEDOs? One possibility is a reminder of specific requirements in the DNSR newsletter. “Say it once & say it often.”

ACTION ITEM: K. Mayer to share this proposal with PCD.

S. Faille:

- A project is under way (began in 2018) to work on the review of all of the licence conditions to see if they are still applicable or if they need updating. We are soliciting feedback on the impact or concerns of the proposed changes from licensees. Some licence conditions may affect Industrial Radiography and as a result, you may receive some consultation. Your feedback is important, especially if the expectations seem unclear or unreasonable please let us know.

There was some discussion amongst the group on a recent non-compliance surrounding LC2300 which involves thousands of customers across Canada. T. Levey added that we work at site every day and go back and forth to a central office location (fab shop type of work). If we follow the wording in the LC, we would have to implement a storage site at

every customer site, which seems very unreasonable since for one it is not economically feasible and a huge burden to implement. Both P. MacNeil and A. Brady echoed the same comments. A. Brady added that contract might only be for 4 months finite and there is a definitive end. It comes very close to the deadline. P. Larkin related that in some cases, the dark rooms stay on site permanently for almost a year (6 days per week) which contradicts the wording of the licence condition and is a non-compliance. P. MacNeil asked if there is consideration for modifying the LC. S. Faille added that this is part of the review process for the licence conditions and these are all great points to consider. We will review internally and see what the best overall solution is to address this type of situation as it affects not just industrial radiography but also portable gauges and well logging (logging sealed source) licensees.

There was brief discussion on another LC 2575 (storage) for dose in an occupied area. T. Levey stated that it really depends where the storage area is located and in most cases in the industrial radiography industry occupancy is quite low. B. Bizzarri added that consideration for ALARA and occupancy all around and that an unoccupied back shop storage is one example but there is also those that have an adjacent neighbour. C. Moses acknowledged that the basis is on many conservative assumptions with the ultimate goal to keep doses lower to the public and workers (ALARA). The onus is on the licensee to provide calculations and easily referenced justifications. These are all great options to consider during the LC reviews to ensure that the expectations are verifiable and achievable.

ACTION ITEM: K. Mayer to take the comments back to both the NSRDLD/OID Working Group and the Licence Condition Review Team for discuss industry concerns and to determine the intent of the condition. Following the internal discussions, CNSC will communicate the information to the entire industry for consultation (feedback).

Site Security Plans (SSP):

- CNSC asked Industry members the question as to whether everyone includes the trucks in their security plans. Everyone agreed that the trucks were included and they follow requirements set out in REGDOC-2.12.3
- For a new office location that a licensee want to Commission, is a site-specific security plan required? In the meantime, they are in the vehicle and considered in transit, the sources are in limbo since the storage location is not in SSTS, is this a non-compliance?

We are working with NSD to develop a better-harmonized approach/program to manage communications between CNSC staff and licensees. This will include better synchronization for approvals of new locations.

Since SSPs are confidential, the requirement is to send as a paper copy, not electronically. There is no sign of that requirement changing any time soon.

B. Bizzarri mentioned that the whole process of declaration and request to the CNSC is very lengthy. It is a lot of work to commission a new IR location. It would be nice to have better

communication, for the process to be transparent so that licensees see info in and info out without having to chase after the information.

It is important to make sure it is clear on the documentation if it is for a 90-day location for an existing licence and not a brand new location. If records are accessible (electronic records are acceptable), physical records not required on site.

ACTION ITEM: All members to send any concerns for improving the process at 90-day site locations to K. Mayer.

Review/Adoption of Previous Minutes

Minutes from last meeting (November 20, 2018) were emailed out to all members prior to the meeting. Upon review by the members, they identified some minor changes to be updated as follows:

1. Page 6 paragraph 6

- a. Every source change; devices are borescoped; ... K. Mayer to get clarity from C. Auzenne “It’s not a requirement but QSA does it every time.” Are the QSA suppliers also required to do it every time?
- b. Does QSA do as part of annual maintenance?
 - i. Not a Regulatory requirement.
 - ii. Concern in Industry
 1. 660B – timely point to borescope
 2. 880 – Concern of the “S” tubes wearing out like the older design and this was the only way to determine a problem with leak or drive cable.

The 880s are built with Titanium s-tubes because of past concerns (this is the main reason why they changed from the S/S; the design has also been changed and no longer has the sharp s-band.

- c. Communication to Licensees:
 - i. CNSC sent out a letter requesting Industrial Radiography licensees to provide information on what kind of maintenance practices are carried out on their exposure devices (parts, who is doing it, etc.). Approximately 40% have responded. The CNSC strongly encourages Industry to respond so data is more complete.

2. Page 5 paragraph 10

- a. CIRSA Bulletin – clarification was requested on the wording. This is general comment no one specific, maybe CIRSA should not be attached to this comment; K. Mayer will look into the wording.

3. Page 8 paragraph 5

- a. Clarification was requested for about NAIT has added Also, the spelling of KEENO should be KEANO.

4. Page 3 16WGM1.1

- a. In first line of paragraph “a space is needed between Eric and Pouliot.

5. Page 6 paragraph 9

- a. Second line the word “compliment” should be “complement”.

6. Page 10 – Many items that have been suggested by Lucie Simoneau...

- a. Clarification from PCD on these statements. Also, in the line hrs. per year at the end an “r” needs to be added to you (the last one in that line).

16WGM2.2 – update from A. Brady

To date, a meeting has not occurred with CIRSA on this matter, he will follow up when together face to face.

While attending the NRCan Scheme Committee meeting, A. Brady spoke to most of the training providers:

- SAIT – have received a copy of their program
- QCC – getting a copy of their program soon
- Durham – have received a copy of their program
- Quebec (CEGEP Trois-Rivières) – getting a copy of their program soon
- CINDE – have not received

A. Brady will finish reviewing the programs against PCP09 requirements and will update once completed and pass the information along to IRWG and CIRSA, once complete.

17WGM2.4

- We have not had much success or responses to those we have reached out to. Individual Education Co-Operative (IEC) - Sarnia – no response yet, but has only been sent out in last couple of weeks. A. Brady will send a copy to P. MacNeil.
- Also suggested to send a similar email to Energy Safety Canada in Alberta as this is the equivalent to IEC for Western Canada.
- International Pressure Equipment Integrity Association – 3 day programming is held annually in Banff in March.

18WGM2.1

- Would everyone please think of some questions, and forward them on to K. Mayer so that a survey can be put together and sent out via Survey Monkey by May 2019?

18WGM2.2

- Paragraph has been added. K. Mayer will verify and then this item will be closed.

18WGM2.3

- This item will remain ongoing as it is nice to have a foot in the door with clients and the group will continue to work on it.

18WGM2.4

- Please send any contacts (Safety Departments) to K. Mayer.

18WGM2.5

- **Closed**

18WGM2.6

- K. Mayer will forward B. Tyler's presentation to the group and will set up at Webinar in March 2019.
Nuclear Security Division – booked for a presentation at May meeting.

P. MacNeil (Industry) put forward the motion to accept the minutes with changes and S. Faille (CNSC) seconded the motion.

Membership Discussion

E. Pouliot from Mistras Services Inc. (Eastern Canada) attended the meeting as a guest and provided a brief description of himself; including work experience, and why he would like to join the IRWG.

He has been a CEDO for 12 years and been in the Industry for 13 years of which most were as a technician. He has been an RSO for a year now (since February 2018). He admits it was a rough start at the beginning (much better now) and wants to improve their program and sees this opportunity as an excellent way to help achieve that. As a new RSO, he understands the challenges in the Industry; he has a lot of experience in the field but feel that he would provide fresh eyes from the outside coming into the group. He would like to help others. He is very committed to safety culture and wants to learn from others. E. Pouliot approached A. Brady with his interest in joining the group as an Industry member as well as approached K. Mayer and C. Moses.

Once, he finished his presentation and a few questions by the members, it was decided that E. Pouliot would disconnect from the telecom so that the WG members could have a quick roundtable discussion vote on his potential candidacy for members to the group. In summary, all members unanimously voted with a fist of five for him to join as a new working group member. The comments included he will bring forward challenges of a new RSO in the Industry; all members are willing to help and provide tips to him. It is great to have someone else from Eastern Canada; he is willing to commit and has provided great input in this meeting. It is very positive that he is looking to make improvements and will have a different approach.

E. Pouliot was welcomed as a great addition as an Industry member to the Industrial Radiography Working Group!

Equipment Update

C. Auzenne is attending an NDT Conference in Las Vegas this week, but joined the meeting via teleconference to provide the group with a quick update.

Scar Pro cameras with Se-75 cameras – crawler progressing very slowly (JME Partner). QSA hopes to have a more detailed by the end of summer or fall 2019.

PCD/CEDO/PCP-09 Update provided by K. Mayer for J. Sigetich

PCD is continuing to work on the draft of PCP-09 and are planning to complete an updated version by the end of summer 2019. They will send the document to the Scheme Committee (SC) for comments and set up a SC meeting to discuss the comments.

This updated proposed deadline is one year later than originally planned.

PCD is also working on an updated version of the EDO practical examination taking into consideration the comments received from the IRWG. The plan is to make this into a CNSC form that the CNSC will expect all licensees to use. PCD will send the updated exam to the IRWG and possibly to the PCP-09 Scheme Committee for review prior to formally issuing the exam.

The process is ongoing for updating the EDO application forms; however, progress is slow to date. Furthermore, PCD is working on potential updates to the CNSC *Cost Recovery Fees Regulations*, which include possible future fees for such items as an application for renewal of certification. PCD will provide further updates at future meetings.

Both PCD & NRCan will be on the agenda for the Annual meetings in both Ottawa and Nisku.

There was some discussion around the value in having a PCD Database. Although there are privacy concerns, it may be possible to add a consent for release of information to a database to the renewal form. This is something to consider and to discuss with PCD.

ACTION ITEM: K. Mayer to relay information to J. Sigetich (PCD) about possible database and discussion.

Equipment Failures Discussion

T. Levey brought up a drive cable failure in Grande Prairie, AB. The company sent the cable to QSA for forensic failure analysis but no word back yet. T. Levey is aware of two other companies with similar instances. One is Acuren (U.S.) and the other is Team (U.S.). A break in the middle of the Teleflex cable was common to both. Both instances appear to be due to a lack of quarterly maintenance and not found during the inspection. There appears to be corrosion in

the core of the cable. The root cause was determined to be inadequate maintenance (either not performed correctly or not done at all). This is a concern to industry as 20 years ago; there was a third party incident and involved a 140-page report for a similar incident. This could be a source disconnect issue so want to get the word out. The concern is that if it happens again, a licensee could have a serious disconnect. Another company in Canada had a source disconnect where the wires inside seem to be breaking. Both TISI and Acuren had incidents in the US and only Inspectrum has had a similar incident here in Canada in the last couple of years.

A report is forthcoming from QSA for the non-destructive failure analysis (inner wires are breaking at the male connector). Acuren did the inspection for the other licensee (Inspectrum).

The cause is likely poor maintenance (because there have only been one or two incidents reported since 2000). There is a new style of drive cable (with a gold finish). QSA says that these cables have been around for a while. The Inspectrum incident also involved a gold cable. If they have changed vendors for the drive cables, QSA states that there would have to be a QA/QC at QSA before a release of the parts for production.

ACTION ITEM: S. Faille to ask our certification people to contact QSA to see if this is a real concern or a one off.

Planning Spring Meeting

Dates

- May 8, 2019 – Ottawa
- May 23, 2019 – Nisku

CIRSA meeting May 22, 2019 followed by an Industrial Radiography Working Group meeting later in the day.

Content of Meeting

- CNSC Regulatory Update
- NSD – Presentation on Security Update & Transport-Security Exercise
- Tethering of Tools – Aritas (new company) Presentation on customized tethering equipment and new equipment available to the industry.
 - A. Brady knows the company and will reach out to them
 - Acuren, Mistras and TISI could do a presentation on safety and challenges faced with doing Rope Access in Industrial Radiography as a Segway to Aritas presentation; E. Pouliot can deliver the presentation for the group.
 - A. Brady to invite company to both meetings and will copy Karen on invite
- 2 – Case Studies (East and West)
- Transport Canada – (?) role in what we do
- NRCan & PCD
- IRSS re: Drive Cables (issues seen with equipment)

- WebEx will be offered again this year for both meetings

ACTION ITEMS: E. Pouliot will deliver a presentation on safety and challenges with rope access (A. Brady, T. Levey and E. Pouliot to work as a team to develop the presentation).

A. Brady to contact IRSS

A. Brady to contact Aritas

K. Mayer to put together proposed agenda and work with T. Madsen and T. Doucette (CNSC) for invitation and communications for meeting.

Any Other Business

- Nothing further to add

Next Meeting

The next Industrial Radiography Working Group meeting in Nisku on May 22, 2019 following the CIRSA meeting (exact time TBD).

K. Mayer adjourned the meeting at 1:15 pm (MST) / 3:15 pm (EST)

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
15WGM2.2	Ensure IRWG members are invited to Commission meeting for industrial report presentation	K. Mayer/ C. Moses	Ongoing
15WGM2.6	Provide further updates on QSA equipment	C. Auzenne	Ongoing
16WGM2.2	Provide an assessment of whether CIRSA can review large trainers programs for pre-qualification at next meeting.	A. Brady	Ongoing
17WGM2.4	Client subgroup members (K. Mayer, L. Simoneau, P. MacNeil and A. Brady) to look into H&S councils and conferences, magazines that we could potentially publish an article in or bulletin boards and provide updates on progress at meeting.	K. Mayer and sub-group	Ongoing
18WGM2.1	Provide questions for trainers to Karen for early May so that we can set up a survey to send out by end of May 2019.	All	May 2019
18WGM2.2	Update ToRs accordingly to add new paragraph.	K. Mayer	Closed
18WGM2.3	Look at collecting data and info with a technical trainee on who we should reach out to.	A Bouchard	Ongoing
18WGM2.4	Send a list of any potential contacts (clients) you may have to K. Mayer	All	May 2019
18WGM2.5	Invite E. Pouliot (Mistras – Eastern) to next IRWG meeting	K. Mayer /L. Simoneau	Closed
18WGM2.6	Invite someone from Safeguards to next IRWG meeting to give a presentation on expectations and requirements	K. Mayer	Closed

19WGM1.1	Share proposal to better communicate with CEDOs (possible article in DNSR Newsletter) with PCD	K. Mayer	May 2019
19WGM1.2	Take comments back to NSRDLD/OID Working Group and Licence Condition Review Team to discuss industry concerns and determine intent of LC2300. Update IRWG on progress	K. Mayer	May 2019
19WGM1.3	All members to send any concerns for improving the process at 90-day site locations to K. Mayer.	All	May 2019
19WGM1.4	Pass along information to J. Sigetich (PCD) about possible database (value added) and set up an internal discussion.	K. Mayer	May 2019
19WGM1.5	Check with our certification people and contact QSA to see if this is a real concern or a one off (related to Equipment Failure Discussion)	S. Faille	May 2019
19WGM1.6	Work as a team (A. Brady, T. Levey and E. Pouliot) to develop a presentation (Industry) on the safety and challenges with rope access in IR. E. Pouliot will deliver the presentation at the annual meetings.	E. Pouliot A. Brady T. Levey	May 2019
19WGM1.7	Contact IRSS and Aritas for presentations for annual meeting	A. Brady	March 2019
19WGM1.8	Put together proposed agenda and send out invitation for meeting (work with T. Madsen and T. Doucette (CNCS) for invitation and communications for meeting)	K. Mayer	March 2019