

CNSC/ Industrial Radiography Working Group Meeting
February 5, 2018
CSNC Ottawa Laurier Office 410 Laurier Ave West
Ottawa, ON

Attendees:

C. Moses (CNSC)	H. Rabski (CNSC)
P. Fundarek (CNSC)	K. Mayer (CNSC)
L. Simoneau (CNSC)	A. Brady (TISI)
J. Sigetich (CNSC)	P. Larkin (CNSC)
P. MacNeil (A-Tech)	D. Hebert (Nucléom Inc.) (guest)
C. Auzenne (QSA Global) via teleconference	
T. Madsen (CNSC) via videoconference (minutes)	

Absentees:

T. Levey (Acuren)
B. Bizzarri (GB Contract Inspection)

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

K. Mayer opened the meeting at 10:30 am.

A Brady is looking for video/transcript of ROR presentation to the Commission. P. Fundarek confirmed it is available on the website and will send the link to the Working Group.

The agenda was adopted as proposed.

Review/Adoption of Previous Minutes

Minutes from the last meeting (October 11, 2017) were emailed to all members prior to the meeting. Some minor changes were discussed and K. Mayer will update the minutes to reflect the changes. C. Auzenne clarified the statement in paragraph 2 on page 6 of 14 for the members regarding “QSA No-Go gauges cannot be drilled through, this was not the case with the Nordion gauges.”

A Brady put forth motion to adopt the minutes with the proposed changes; the motion was confirmed by P. MacNeil.

Review of Terms of Reference

This is the annual review of the Terms of Reference. A good discussion took place on officially filling the Secretary position on the Working Group. The main question is whether the secretary

position should be an actual member of the working group or bring in a CNSC Administrative Assistant.

- Question as to whether it should it be a member or a CNSC Administrative Assistant.
- Having someone in this position would ensure consistency for the meetings.
- Send out draft of minutes to Co-chairs prior to distributing

Action item – K. Mayer to update the ToRs accordingly

Review of Action List

The action list was reviewed and updated accordingly.

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 – October 2018

REGDOC 2.5.5 is in the final stages of approval and should be published late March/early April 2018, the document will be available before our spring meeting.

15WGM2.3 Check in with Coms division (CNSC) for options for videotaping and protocol for live feed, etc.

K. Mayer met with M. Dodier (CNSC) to see what our options are and even for improving WEBEX capabilities for the spring 2018 meetings.

A discussion took place on what worked and what didn't work at last year's meeting. The main problem was recording and intermittent connection issues.

The contact information for the Holiday Inn and Suites for the Western meeting was provided to M. Dodier. She has reached out to the hotel to see what options are available.

Update for 2018 meetings:

- WEBEX will be available for both meetings; this will allow anyone from East or West or anywhere else to connect to either meeting.
- WEBEX can be recorded, however, there are limitations. Microphones could be placed strategically in the room to allow for better sound pick up. This is part of the hotel logistics and will be arranged directly with the hotel.
- Since there are recording limitations, the goal would be to record the important parts such as the case studies.
- The idea is to proceed with the lowest cost option.
- After the meeting, an analysis will have to be done on the time, resources, money, quality, etc. to see if it is really worth it in the end?

15WGM2.4 - Industry (CIRSA) to check with community colleges for possible video opportunities.

A Brady checked with a couple colleges and at the time of our meetings school is done; there won't be any no students available, so he suggested that we proceed with the CNSC option (WEBEX).

15WGM2.5 Reach out to Licensees (Syncrude and Suncor) to see if interest in presentation at annual meeting.

Syncrude spoke at both meetings last year, so hopefully Suncor could present at this year's meetings. K. Mayer or A. Brady to try and contact Suncor.

Action Item – Suncor to be contacted to solicit their interest.

16WGM1.1 Invite potential IRWG member to attend next working group meeting

K. Mayer and L. Simoneau invited D. Hébert – Nucléom Inc. to attend this meeting.

D. Hébert gave a brief summary of his qualifications:

- 30 years' experience in Industry
- CEDO, Level II
- He worked in QC most of his career, as well as some work in Western Canada and has returned to working in Eastern Canada.
- He has a great deal of experience as he worked for a licensee that had a history of problems and he learned a lot from this experience.
- D. Hébert would like to join the working group to make a difference in the IR industry.
- He currently works for Nucléom Inc. – a small company in Québec City who do a lot of NDT work with the reactors (OPG specifically) as well as overseas.
- He is setting up their RT dept. and they have recently been issued a new licence.
- The Company is in agreement with their RSO participating as a member on the Working Group. K. Mayer spoke to company boss and confirmed that he is on board with the idea and feels it would be a valuable and positive experience for them.

An open discussion between the Working Group members and D. Hébert took place on what kind of changes he has observed in the IR industry over the years:

D. Hébert's responses are as follows:

- In 2008 he started to see a different approach, it is now a learn and grow together environment.
- He's seen many improvements over the years in communication and CNSC presence.
- He is a bilingual representative.
- The company he is working for is new to radiography (RT) but not NDT.
- It was decided that he could be a new working group member on the condition of getting his CNSC licence.
- The company has good safety culture.

Concerns expressed by D. Hébert

- Auditing in the field – not often enough by CNSC.
- He would like to see a bigger presence from CNSC.

A vote amongst the members was done on the spot (Fist of Five methodology) and all were in favour. Welcome to the group! An announcement will be made at the meeting as well as on the website.

16WGM2.2 Provide an assessment of whether CIRSA can review large trainers programs for pre-qualification at next meeting.

- A. Brady reported that T. Levey is no longer involved with this item, his name will be removed.
- The list is being divided up between A. Brady, P. MacNeil and B. Bizzarri.
- To date, A. Brady has completed one:
 - 40 hour training program.
 - Assessment of course outlines and reviewed as an Industry group.
 - The course outlines reviewed to ensure they are aligned with PCP-09 requirements.
 - This could be promoted on the CIRSA website to let public know courses available.
 - They will continue to work on assessing the large trainers.

Training was discussed in more detail and trainers specifically. Some trainers involved with Scheme Committee but no trainers on the working group. Why are there no trainers specifically on the working group as members?

- In the past, DNSR Management decided that trainers could not be on the working group because they are not licensees and not regulated by the CNSC.
- P. MacNeil stated that she feels that industry is not fully represented without training being included in these meetings.
- Trainers came to one PCP-09 meeting and then never attended again.
- Invitations have been extended to trainers to participate in our meetings (working group and annual meetings with no response).
- Furthermore, no trainers have approached asking to attend.
- PCDs perspective is that none of the programs have been evaluated and we cannot provide any endorsement.
- Membership could be seen as endorsing one over another – very close to an unfair competitive advantage.
- C. Moses believes trainers would be add value if they attended and since they have a stake in this industry, they would be allowed to attend as invitees.

Action Item – P. MacNeil, on behalf of industry, will send out a letter to canvas training organizations and see if they are interested in attending this forum. This would be a separate action from 16WGM2.2.

Action Item – J. Sigetich will provide the most recent list to the IR working group.

Action Item – K. Mayer – Will send out invitation to attend the annual meeting.

P. MacNeil recommended if and when we find trainers that we adjust Terms of Reference not under Membership. This is noted and we will continue to review the process.

16WGM2.4 Client Expectations – L. Simoneau update on progress of maintenance document for inspections.

L. Simoneau provided an update on the progress:

- The worksheet has not been finalized, and will likely not be complete till the end of the fiscal year.
- There is a reference to the manufacturer's manual on the worksheet.
- Some comments provided by Industry have been included however there are some comments that contradicted the maintenance manual. It will be presented at the Inspector's work group meeting and discussed further.
- L. Simoneau added that the maintenance manuals are sometimes vague and recommend a schedule which makes it difficult to enforce as an Inspector.
- Ideally, it would be great if procedures specifically required quarterly inspections done one way or another. Everything must be documented.
- Another point is that when maintenance is not performed for one reason or another that it is clearly documented as to why it has not been completed.
- C. Auzenne added that it is hard to make it a requirement as depending on the situation and operations; maintenance may be required more or less often. It is hard to make a recommendation based on operations black and white.
- The onus is on the licensee to carry out maintenance as required and a breakdown will show whether it is being done or not.
- Records are required for quarterly inspections. If no records are available, then the assumption will be made that the maintenance is not being done.
- A licence condition on IR licences would be ideal since most radiation protection manuals (RPM) state that maintenance will be done in accordance with manufacturer's specifications. Since the RPMs are referenced on the licence it provides a regulatory hook. A further discussion took place to explain LC2917 and 2920.
- The actual exposure device manuals should not be referenced on the licence, but rather the process included in the licensee's RPM.
- This is an internal CNSC issue to be discussed more at the Inspector meeting.

QSA Update – C. Auzenne

No updates at this time. Working on a few new items/products and will update at the next meeting.

CNSC/Regulatory Updates (CNSC Management)

- REGDOC 2.5.5 is in the final stages. Looking at documents, design criteria and guidelines. Not a regulatory document, so no plans to add to licence as a requirement at this time.
- The evaluation of the RSO program has been launched. The main objective of the program is to look at the program to determine what elements may be necessary for RSOs to have better oversight over regulated operations. It also must be determined if more complex governance is required and to better define responsibilities.
- How do we need to evolve our regulatory oversight program?
 - By gathering data to see how things are working in the field
 - Conduct a survey – as well as carry out some interviews with medical and academic staff involving both workers and management.
 - The focus will be on the medical/academic community for interviews for right now, however, the survey will likely be release to the industrial/commercial community within 6-8 months. The CNSC appreciates your engagement and feedback. There are multiple hospitals spread out over different geographic locations and becomes more of a challenge to effectively manage.
 - The goal is to see if there are commonalities across this sector and if they may also apply to other sectors.
- The program will incorporate the influence of Type 1 criteria and data to populate information for the development of a REGDOC. An emphasis will be placed on the critical importance of leadership and engagement and many of the following key principles within a management system that should apply to all:
 - Oversight of program – internal audit programs
 - Developing REGDOC on management
 - Ensuring that procedures and policies exist to govern management in operations
 - It is critical that programs have the a system in place to raise and address problems
 - Safe work environment with good safety culture
 - The document is supposed to go for consultation in Spring and may possibly be published by the Fall – please provide feedback once it comes out.

C. Moses provided some information on a Workers Compensation case in Québec involving an overexposure of a worker in a Sugar Factory with an x-ray device. This is not a company which regulated by the CNSC. There was no worker protection in place. The worker received a dose of approximately 2 Sv over the year and the Provincial government confirmed the individual does have health issues and that there was indeed a link to the exposure. As a result, the worker was awarded a Workers Compensation claim.

Also, for your information, there was a hearing related to exposures received from IR many years ago in which it involved:

- A QSA 660 being used with a modified collimator.
- A CEDO was de-certified as a result of the incident.

- A preliminary review determined the potential exposure to be below the regulatory limits, however, a subsequent review with chromosomal analysis revealed a significant exposure.

This serves as a reminder to ensure workers are trained and following your company policies and procedures.

The Client Guide has been published and we are interested in any feedback from Industry and from clients.

OID (Inspections) Update - H. Rabski

- We have many new technical trainees and will continue to hire more. The performance data has been updated by one of our technical trainees, it was presented during the meeting and a copy of the 2016 stats will be distributed with the minutes.
- P. MacNeil asked how many, on average, inspections per year? There are approximately 140 not specifically to Industrial Radiography.

PCD/CEDO Update – J. Sigetich

Background

- PCP-09 was published in 2015
- PCP-09 has been fully implemented for initial certifications since 2016 and there was gradual implementation for renewals. As of January 2017, PCP-09 requirements have been fully implemented for all certification renewals.
- A new version of the Scheme Committee was convened in 2016. A meeting was held in October 2016 to discuss issues with PCP-09 and possible revisions to the document. CNSC has the comments and is working on a revised version of PCP-09.
- Overall, based on internal CNSC comments and Industry, the feeling is that PCP-09 processes are working well; there are some clarifications and updates required.
- CNSC (PCD) is currently working on the revision; unfortunately there have been some delays.
- A priority was placed on improving the application process to make it as efficient as possible.
- Over the past two years, there has been real success in decreasing processing times. The average time to process applications was about 60 days in 2015, 40 days in 2016 and about 20 days in 2017. 2015 - 60 days.
- This decrease in processing times is a direct result of:
 - Updated application forms in 2017
 - Standardizing requests for information (text/communication to improve communication to radiographers with more consistency)
 - Now sending a scan of all certification letters and cards to the applicant (will know a week in advance), the official documents will follow in the mail.
- The cause for the delay with PCP-09 is due to staffing issues and shifting the work focus to deal with the application and improvements to decrease the processing times.
- The plan is to complete the revision of PCP-09 by the end of the summer 2018 and send it to CSA for distribution to the Scheme Committee.

- A Scheme committee meeting will be convened in fall 2018 to discuss the document. The comments received will be incorporated into the document and circulated to industry for comment (consultation).
- The potential issues that have been identified with PCP-09 are:
 - Clarification /restructuring
 - Inconsistencies in wording
 - Alternatives to training
 - Validity periods for training /exams
- There was a special Scheme Committee meeting in April 2017 to perform a review of the questions and answers in the EDO written exam.

Certification Program Improvements /Updates:

- CNSC now sends scan of all certification letters and cards to the applicant
- NRCAN now has e-registration, e-examinations
- Exams have been reduced to 90 questions
- The exams still have to be taken at official NRCAN centres across Canada; the reason is that an exam must be proctored.
- Looking for feedback on the process – CNSC will send out a message to industry on this
- Reasons for delays and why additional information is requested:
 - May require more information.
 - The dates on the practical exam and the date the application form was signed do not match. The attestation is signed before the practical exam was taken. This is not acceptable as the exam must be taken before the attestation can be signed.
 - Authorized representative (examiner for practical exam) or else a company representative must be in the list of authorized representatives in our database.
 - The onus is on the CEDO to maintain their own records and be able to demonstrate that they are qualified. They should keep records of working as a trainee, which companies they have worked for, records of their education and any other information they feel is important and could be useful on their application. They are the person applying and they must be accountable for this information. This should not be an undue burden on them.
 - H. Rabski asked about consequences for false information and to date they haven't come across that, however if it should arise, it will be dealt with on a case by case basis.
 - P. MacNeil explained that CEDOs tend to put the onus on the companies so maybe something should be put out there so the CEDO is aware that it is their responsibility. It will be talked about at the annual meeting.

Action Item – K. Mayer will discuss at the annual meeting - onus for CEDOS to maintain their records

- Decertification could be considered for attestations without proof.
 - There is sometimes unclear information about the working history after a certification card expires. There is no indication of what that person has been

doing. It should be clearly stated that a person has not been working as an EDO after the expiry date and that they have only worked under the supervision of a certified EDO. This has to be clear on the application.

- PCD is looking for feedback on :
 - their process
 - response times
 - information
 - information received from CNSC
 - website
 - e-registration for written examination
 - 90 question written examination

Recertification Concerns:

- 5 years x 8 hrs./year = 40 hours
- The transition period is only in effect from 2015. Training records are not required for training prior to PCP-09 implementation.
 - 2015 – 10 hours continuing education
 - 2016 – 20 hours continuing education
 - 2017 – 40 hours continuing education.

P. MacNeil's comments:

- Five years and eight hours continuing training. This is too much because it is not increasing safety. The scope of the job has not changed.
- Scope of the job hasn't changed.
- A complete regulatory review should be mandatory rather than 15 minutes of training here and there from staff meetings (which may or may not have anything to do with radiation safety).
- 8 hours of actual training – what does this mean? Refresher and update training are main components of continuous education and each company should ensure that workers have these in place.
- There is nothing to say what the 40 hours includes.
- New equipment change in device required to have training.

Expectations for Continuing Education

- It is vague, there is nothing to say what it must include (i.e. update to regulations, device changes, etc.)
- This should be clearly defined in the training program.

PCP 09 – Alternatives to continuing education

- If not employed when certification expires – then the expectation should not be that they need to have 40 hours.
- Currently clause in PCP-09 – stating case by case – i.e. when card expires.
- If there are any questions, please contact the CEDO program.

H. Rabski explained that this could be an opportunity for the trainer group to provide continuing education with online courses, or reference kits.

A Brady explained that the renewal should be short, 3-8 hours, like a refresher.

Action Item: K. Mayer to work on wording for letter of Industrial Radiography Meeting participants.

A. Brady expressed that he is impressed with turnaround time for PCD. There is real improvement.

Annual Spring Meeting Planning – Agenda

Ottawa meeting – May 9, 2018 and Nisku meeting – May 15, 2018

There was discussion and suggestions for the agenda for the annual Industrial Radiography Meetings in May.

- Type 1 audits – What CNSC does? Licensee outcome – what they learned.
- Radiation Safety Officers – anticipating of Regulating RSOs.
- Any training group interested in participating? Perhaps discussion of 40 hours.
- Reg. Doc. 2.5.5 overview – a CNSC presentation so they are aware for their overall safety program for Radiography.
- PCD & NRCan updates.
- 2 Case studies at both Western and Eastern meetings.

Client Expectations

- Client Guide – has there been any feedback?

Discussion regarding upcoming conferences and where would be good to attend.

Meeting adjourned at 4:05 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	October 2018
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, protocol for live feed, etc.	K. Mayer	Closed
15WGM2.4	Industry (CIRSA) to check with community colleges for possible contacts for video opportunities.	A. Brady	October 2018
15WGM2.5	Reach out to licensees (Syncrude and Suncor) to see if interest in presentation at annual meeting	K. Mayer	October 2018
15WGM2.6	Provide further updates on QSA equipment	C. Auzenne	Ongoing
16WGM1.1	Invite potential IRWG member to attend next working group meeting	K. Mayer / L. Simoneau	Closed
16WGM2.2	Provide an assessment of whether CIRSA can review large trainers programs for pre-qualification at next meeting.	A. Brady	October 2018
17WGM1.9	Develop proposed meeting agenda based on notes; it will be sent out with the minutes and the invitation.	K. Mayer	Closed
17WGM2.1	K. Mayer to set up a meeting (CNSC) to discuss the strategy and plan forward, for the implementation of	K. Mayer	Closed

	document REGDOC-2.5.5.		
17WGM2.2	L. Simoneau to provide an update on the progress of Inspectors maintenance document.	L. Simoneau	Closed
17WGM2.3	K. Mayer will explore the process with management (internal review) to see if at the very least, the source disconnect information can be shared.	K. Mayer	Closed
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	October 2018
17WGM2.5	C. Moses send link for Alberta H&S conference	C. Moses	March 2018
18WGM1.1	P. Fundarek to send the link for the video/transcript of ROR to the Working Group.	P. Fundarek	March 2018
18WGM1.2	Update a new practical exam	A.Brady/ D. Hébert	October 2018
18WGM1.3	Provide most recent list of trainers to working group members	J. Sigetich	March 2018
18WGM1.4	Send out invitation for annual meeting	K. Mayer	March 2018
18WGM1.5	Discussion at meeting – CEDOs responsibility to maintain records	K. Mayer	May 2018
18WGM1.6	Update practical exam	A. Brady / D. Hébert	October 2018