

**CNSC/Industrial Radiography Working Group Meeting  
October 16, 2012  
CNSC Southern Regional Office, Mississauga, Ontario**

**Attendees:**

André Régimbald (CNSC)	Tom Levey (Acuren)
Peter Fundarek (CNSC)	Rick DeBruyn (Aztec)
Henry Rabski (CNSC)	Peter Larkin (CNSC)
Alan Brady (TISI)	Lucie Simoneau (CNSC)
Sylvain Faille (CNSC)	Patricia McNeil (Atech)
Doug Hanna (SGS)	Karen Mayer (CNSC)
Dan Sullivan (CNSC)	Richard Robichaud (TISI) - Invitee

**Absent:**

Chris Spencer (Spencer Manufacturing)

**Chair of the Meeting**

Henry Rabski

**Co-Chair**

Alan Brady

**1) Review of Minutes from Previous Meeting**

1. A. Regimbald opened the meeting by acknowledging the commitment of the working group members and the progress that has been made in improving safety in the Radiography Industry. Lucie Simoneau was introduced as the newest member of the working group, representing the Eastern Regional Office of the CNSC. In addition, Alan Brady introduced his guest for the meeting, Richard Robichaud, Team Industrial VP and General Manager. Minutes arising from the February 15th meeting were reviewed with minor editorial changes. The members unanimously approved the minutes for publication. Concern was raised by members that the publication of the meeting minutes is being delayed by the approval process. **Action:** draft minutes will be circulated to attendees within 30 days of the meeting. Members will be given 15 days to provide comments after which the minutes will be finalized and published. The terms of reference for the group will be revised to include this expectation.

2. Action items were reviewed. The annual meetings were held in May in Leduc and Ottawa. B. Kelly from QSA Global was a guest presenter at the Leduc meeting and will be invited to the Ottawa meeting in 2013. Tentative dates for the annual meetings were suggested (Leduc May 7, 2013 and Ottawa May 22, 2013).

3. Tom Levey provided an update to the industry action item regarding limiting source strength in Radiography Devices. A general discussion including some of the pros and cons, followed with respect to limiting the source strength for Iridium to 80 curries and Cobalt to 50 curries. Such an approach if implemented by the regulator, would level the industry playing field and could result in lower exposure to workers and the public.

Limiting the source strength would result in longer exposure times, and potentially more working hours for the CEDOS. More hours may be beneficial to the CEDO and licensee, however, longer exposure times may be one reason in not justifying a change.

Since the industry has a relatively small population of workers, the health effects attributed to radiography sources would be difficult to determine. Benchmarking with other countries would prove challenging due to the varying types of radiography being performed and differing working conditions. Members identified that in the case of cobalt sources, the maximum source strength proposed would limit the ability for certain radiographs of dense materials or special evaluations to take place. Tom suggested that a survey of radiography companies be performed regarding the concept of limiting source strength. The CNSC could provide the mailing addresses of current licensees and proposal any additional questions to be included in the survey. **Action:** a survey regarding limiting source strength would be distributed and results shared with the working group at a future meeting. The original action still remains for the industry to build a case that would justify, or not, the need to limit source activity.

## **2) CSA-CEDO Project Update**

Dan Sullivan informed the group that the beta test of the new question bank for the proposed CEDO exam was available for CEDOs to start evaluating. CSA indicated that to properly evaluate the questions, at least 70 to 80 individuals need to take the exam. The exam will involve answering all 220 of the questions developed. Once the evaluation has been completed, a group of experts from the industry will evaluate the results and confirm the test bank of questions. Dan emphasized that volunteers need to step forward and take the exam.

In September, a draft "personnel certification guide" was prepared by CSA and CNSC staff. The document will be reviewed by the Scheme Committee and the CNSC prior to release for industry comment. It is estimated that the release will take place sometime before the end of the year and will be available for public comment thereafter.

CNSC will be initiating a swap of CEDO cards in the coming months to coincide with the adaptation of the standard in 2013. The new card will include an expiry date for CEDO re-certification. A sample of the proposed CEDO card was circulated, along with a sample of a CEDO certificate to be issued by the CNSC under the revised certification process. The Scheme committee will be meeting October 17th at the CSA Mississauga Offices to review the draft guide. Once CSA has received input from the committee and the CNSC, the document will be released for public for comment in early 2013.

## **3) Communications**

Peter Larkin began the discussion on the topic of communications by introducing the document prepared by a sub-group of CNSC staff entitled "Working Safely with Industrial Radiography". This generated a general discussion by the group with respect to the type of communication documents that needs to be developed by the working group. From a client perspective, pamphlets have been developed by individual licensees

as well as CIRSA which provide the information about industrial radiography focussing on that particular audience. The material covers the benefits that radiography provides, how radiography works, hazards in the workplace, and how it can be performed safely.

The group felt that the handbook idea for CEDOs was something that the sub-committee could focus on developing and that it could be based on other safety handbooks developed for industrial users of portable gauges and nuclear devices. Covering the key elements of the safety control areas associated with radiography along with the use of instrumentation and safety equipment would be an excellent tool at the disposal of CEDOs. Information on safety challenges with respect to barriers, signage, and emergency response could be developed and made available on the CNSC website for various audiences. The subcommittee for this item will be led by Peter Larkin and include Alan Brady, Karen Mayer and Mike Grace.

**Action:** Sub-committee to update the working group at the next meeting on the progress achieved in developing communication tools for the industry.

#### **4) Certification Update**

Sylvain Faille, Director of the Transport Licensing and Strategic Support Division, presented an update on Device Certification via a video link from CNSC offices in Ottawa.

The Special Form Certificate for the source used in the Pneumat-A-Ray exposure device has been extended until September 30, 2013. As well, a revised adaptor for the QSA 880 Devices is currently under review. Importation of iridium sources for the first two quarters of 2012 was shared with the group. The number of sources being imported into Canada has dramatically decreased since May 2012 when BEST Belgium went into receivership and the government took over management of the facility. Sources imported from Belgium have decreased from 106 to 29 in the second quarter.

The January 2012 event involving a broken male connector reported by SGS was determined to be due to overloading the connector in tension and not caused by material fatigue. QSA Global has re-designed the adaptor and submitted an application for review by the CNSC.

Questions were raised surrounding the design of these connectors as QSA revised their design several times since the development of the devices. Concerns were raised regarding these modifications as the manufacturer is not replacing the old ones. Sylvain suggested that if industry has information raising concerns with the connectors, to provide such information to the CNSC. To date, the manufacturer has not informed the CNSC with respect to design issues associated with the approved connector.

## 5) CNSC Updates

Events reported by radiography licensees in 2011 and 2012 were summarized and distributed to members. In 2011, thirty-two events were reported and up to September 30<sup>th</sup>, thirty-four events in 2012.

As of October 1, 2012, CNSC inspectors have performed approximately 190 radiography inspections with twenty-seven companies yet to be inspected. In terms of compliance actions taken to date, four orders have been issued by CNSC inspectors and two CEDOs have been decertified. Overall from a safety perspective, inspections have indicated an improvement in compliance by licensees in the areas of emergencies as well as packaging and transport. All other safety control areas have maintained their acceptable compliance performance levels in 2012.

Peter Fundarek updated the group with respect to a number of CNSC regulatory Issues. The CNSC has a discussion paper out for public comment. "Safety Culture for Nuclear Licensees" (DIS-12-07) addresses the understanding and application of safety culture for all licensees. The comment period closes January 4, 2013. With respect to amendments to the Packaging & Transport Regulations, the period for comment closes on October 22, 2012. The amendment is focused on including references to the updated IAEA safety guide of 2009 and possibly updates of the 2012 safety guide.

A discussion paper on Administrative Monetary Penalties, (DIS-12-05) had the discussion period close on September 14, 2012. Industry representatives commented that the period was too short and that they were concerned since the provision of issuing monetary penalties for non-compliances would have a serious impact on their industry. The comment period was dictated by the Federal Government not the CNSC since this was part of the Federal Budget Bill for 2012. For the CNSC initiated discussion papers, the consultation period is more flexible. Feedback regarding the opportunity for consultation period should be directed to the CNSC info account found on the CNSC website.

The Radiation Protection Regulations will be revised and a discussion paper will be issued by the CNSC sometime in early 2013. The Cost Recovery Fees are under review and there will likely be changes made since the last time they were reviewed dates back to 2003. The current effort by licensing and compliance staff is not reflected in the fees being charged. CNSC will be initiating a pilot project for the submission electronically of Annual Compliance Reports. The formal rollout for all licensees will follow in the latter part of 2013. The objective is to simplify the reporting by pre-populating the report with information previously submitted to the CNSC.

Karen Mayer informed the group that RD-GD-42 will be rewritten. This document relates to the criteria for the design of bunkers or Fixed Locations for conducting radiography. Karen asked that group members provided any available information they may have that would assist in completing the document. Tom Levey indicated that he may have information to share with respect to the development of this document.

## **6) Radiography Equipment**

Originally identified as a topic for the working group to tackle, Tom Levey initiated a discussion on engaging the manufacturers in the area of equipment development. Tom pointed out a situation where an Acuren crew experienced a hang-up when returning a source into the camera that was brought to the attention of the manufacturer. This resulted in the manufacturer modifying the female connector. The connector was subsequently replaced on all of the company's cameras but the recall for other owners of the camera was not as apparent. Engaging the manufacturers and developing open communication with the industry has had limited success in the opinion of several of the working group. With the recent changes in the industry and the need to maintain safety as a high priority in the industry, engaging the key manufacturer QSA Global is needed. **Action:** Tom Levey to invite QSA Global, Vice President of Engineering to attend the next meeting and discuss equipment development and industry communication.

## **7) Annual Meeting and Other Business**

The group agreed that the 2013 annual meetings will be held in Leduc Alberta and will take place on May 7, 2013 possibly at the Executive Royal Hotel. The second annual meeting is proposed to be held in Ottawa on May 22, 2013.

Karen Mayer will be taking on a more active role in the coordination of activities of the Working Group. The DRD study report by the CNSC is in final review and will be released to the industry shortly. André thanked the members for their attendance and on-going contributions to the working group. The meeting ended at 3:50 PM.

Next Meeting of Radiography Working Group is proposed to take place in February 2013 at a location to be determined.

<b>Radiography Working Group - ACTION LIST</b>			
<b>RWG Item #</b>	<b>Description</b>	<b>Assigned Person(s)</b>	<b>Status or Due Date</b>
	<b>Communications</b>		
11 (WGM) 1.0	Planning for Annual Meetings 2012 in Leduc and Ottawa.	H. Rabski	Closed
11 (WGM) 3.0	Add information on radiography to CNSC Website	H. Rabski	Open
12 (WGM) 3.0	Subcommittee to identify information to be published and report to WG at the next meeting	P. Larkin	Open
12 (WGM) 1.0	Invitation to SA Global to participate in 2012 Annual Meeting B. Kelly will be invited to the 2013 Annual Meeting in Ottawa	Brady/ Rabski	Closed
12 (WGM) 4.0	Issue draft minutes in 30 days and finalize 15 days later and post.	H. Rabski	Open
	<b>Compliance</b>		
12(WGM) 2.0	Case for Limiting Source Strength in Radiography Cameras----Perform a survey and present findings at a future meeting.	T. Levey	Open
12(WGM) 5.0	Invite QSA Representative to future WG Meeting (Equipment Development Discussion)	T. Levey	Open