### Update on Proposals to Amend Canada's Radiation Protection Regulations

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ISOE ALARA Symposium Fort Lauderdale, USA January 2015

e-Doc:4586849



nuclearsafety.gc.ca

### **Presentation Overview**

- Overview of the Canadian Nuclear Safety Commission (CNSC)
- Background on the *Radiation Protection Regulations*
- Rationale for revision
  - Discussion paper
- Overview of Proposed Amendments
  - Key comments from stakeholders
- Current Status and Next steps
- Conclusion

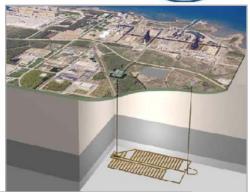
### **Canadian Nuclear Safety Commission**

Regulates the use of nuclear energy and materials to protect the health, safety and security of Canadians and the environment and to implement Canada's international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical and regulatory information to the public



### The CNSC Regulates All Nuclear-related Facilities and Activities...

- Uranium mines and mills
- Uranium fuel fabricators and processing
- Nuclear power plants
- Waste management facilities
- Nuclear substance processing
- Industrial and medical applications
- Nuclear research and educational
- Export/import control





#### ... from cradle to grave

# **Radiation Protection Regulations**

# Current Radiation Protection Regulations (RPR):

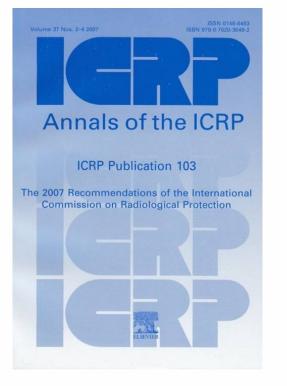
- Promulgated May 31, 2000
- Patterned after ICRP 60 (1990) recommendations

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CONSOLIDATION	
	CODIFICATION
Radiation Protection Regulations	Règlement sur la radioprotection
SOR/2000-203	
	DORS/2000-203
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Last amended on September 12, 2007	Densière modification le 16 septembre 2007
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#### Canadian Nuclear Safety Commission

Source: ICRP Web Site

### **Rationale for Revision**

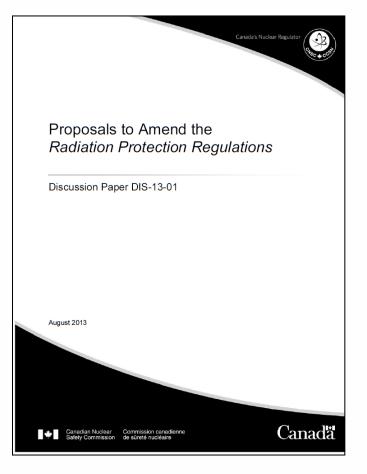


 Changes to international benchmarks:

- new ICRP 103 Recommendations
- new IAEA and EU basic safety standards (2014)
- 2. Operational issues identified
- 3. Fukushima disaster

### **Discussion Paper, DIS-13-01**





DIS-13-01 was published on the CNSC website on August 9, 2013 for a 120-day public consultation period:

- includes discussion of proposed revisions in ~ 20 sections of the Radiation Protection Regulations
- objective was to seek feedback on the proposed revisions

### **Discussion Paper Feedback**

CAUSC + CCST

- ~380 comments from 34 different organizations
- Comments received from:
  - CNSC licensees (NPPs, research reactors, mines and mills, educational institutions, health care facilities/hospitals, industrial radiography, processing facilities)
  - other government organizations
  - associations
  - individuals
- Comments were published on the CNSC website for viewing and feedback for 30 days

### **Outreach Activities**

- CANDU Owners Group RP Seminar and Workshops (October 2013, August 2013 and August 2014)
- Canadian Nuclear Association Conference, February 2014
- Canadian Radiation Protection Association Conference, May 2014
- Licensee Outreach Program 14 sessions across Canada (April-June 2014)





### **PROPOSED AMENDMENTS**

Canadian Nuclear Safety Commission

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# **Proposed Amendments (1)**

#### **Section 7 – Provision of Information**

- Expand the requirement to all "workers"
- Clarify requirements for informing all workers of their dose information
- Addition of a requirement to provide information to workers of their responsibilities in the event of an emergency
- Inform each female worker on rights and obligations with respect to breastfeeding, as well as the potential risks to breast-fed infants during routine operations and emergencies

Concerns regarding high administrative burden and cost versus benefit

# Proposed Amendments (2)



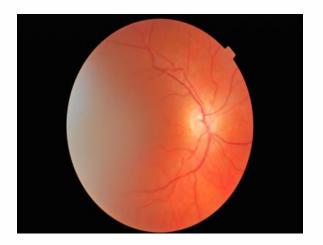
- Addition of a requirement for a female worker to inform the licensee in writing if she is breast-feeding
- Addition of a requirement that licensees adapt working conditions for breast-feeding workers, if required

Comments relate to privacy issues, practicalities of implementation and scope to include only female nuclear energy workers

# **Proposed Amendments (3)**

#### **Section 14 – Equivalent Dose Limits**

 Revise the equivalent dose limit for the lens of the eye for a nuclear energy worker from 150 mSv to 50 mSv in a one-year dosimetry period and 100 mSv in a five-year dosimetry period



Many respondents identified this as a critical issue with concerns about the scientific basis for the change, current uncertainties for ascertaining dose and unavailability of lens of eye licensed dosimetry



#### **Section 15 – Emergencies**

Proposed changes to align with current international guidance and to add clarity to requirements, including:

- amendment to restrict doses to a person during an emergency based on specific emergency actions required
- addition of requirements for when emergency dose limits are exceeded
- additional protective measures for pregnant workers
- provision for a person who acts voluntarily to save or protect human life

General support for the proposed change and alignment with international expectations

### **Proposed Amendment (5)**

# Section 24 - Records to be Kept by Licensees

 Proposal to identify specific time periods for retaining dose records referred to in the *Radiation Protection Regulations*



Stakeholders expressed concerns with aligning with the retention times specified in the IAEA BSS, and sought clarification on the requirement for dose records for all "workers"

# **Proposed New Requirements**

CHASC CCS

- Radiation Detection and Measurement Instrumentation: Introduce requirements to ensure that instruments are fit for purpose and calibrated in accordance with a recognized standard at a defined frequency
- Responsibility for RP: Require that the licensee appoint a person or position to be responsible for implementing the radiation protection program



Source: Ludlum website



#### **Section 15 – Emergencies**

- Now included in Fukushima-related amendments package
- Drafting instructions prepared with proposed regulatory text
- Canada Gazette Part I targeted for Spring 2015
- Opportunity for additional stakeholder feedback



#### All other amendments:

- Stakeholder comments have been reviewed
- Seeking direction from management in January 2015
- Publish "What We Heard Report"
- Develop drafting instructions
- Canada Gazette Part I targeted for Fall 2015
- Canada Gazette Part II targeted for Spring 2016



- CNSC is committed to ensuring its radiation protection requirements remain clear and up-to-date
- Stakeholder feedback is an important part of CNSC's regulatory reviews and their input is actively encouraged
- Regulation making is a rigorous process which involves pre-consultation, drafting, additional public consultation, and the approval of the CNSC Commission and Governor in Council



# **QUESTIONS AND DISCUSSION**

**Canadian Nuclear Safety Commission** 



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Commission canadienne de sûreté nucléaire

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