

November 6, 2017

Canadian Nuclear Safety Commission  
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Ottawa, Ontario, Canada K1P 5S9

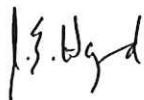
RE: Draft Document Radiation Protection Guidelines for Safe Handling of Decedents (REGDOC-2.7.3)

The Cancer Care Ontario Radiation Safety Officer Community of Practice (CCO RSO CoP) is comprised of Radiation Safety Officers from 14 radiation programs in Cancer Centres across Ontario.

We commend the CNSC on the initiative for the creation of the draft document Radiation Protection Guidelines for the Safe Handling of Decedents and believe that it is both informative and well-written. However; we do offer the following comments and recommendations:

- 1) Section 1.2: The statement “This document provides guidance on how bodies containing radioactive implants can be safely cremated.” The scope of the document is and should be larger than just cremation, and this should be reflected in the scope sections. For example, the CNSC should also consider the ramifications of processing those decedents who are to be entombed.
- 2) Isotopes such as Technetium-99, Thallium-201, Lutetium-177 and Radium-223 are used considerably in the healthcare sector for imaging or therapy. The CNSC should consider including these isotopes in Table 1 and Section 6. In an effort to ensure this document stays current, we suggest that the CNSC consider a web-based list of isotopes and recommendations for the handling of decedents.
- 3) The CNSC should consider including isotopes which are implanted for surgical localization such as I-125 used for localization of breast lesions.
- 4) The CNSC should consider providing a table of time factors such that the level of activity injected into a patient is considered. For example some patients injected with I-131 some start with an activity of 5.55 GBq (150 mCi) whereas others start with 1.11 GBq (30 mCi). The draft document recommends that we would have to wait 2 months for both groups of patients.

The CCO RSO CoP would like to thank the CNSC for consideration of these recommendations. If there are any comments or concerns regarding the recommendations, please do not hesitate to contact Joseph E. Hayward (jhayward@hhsc.ca) or Jeff Richer (jeffrey.richer@wrh.on.ca) who are writing this letter on behalf of the group.



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