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Via E-mail

14 OCT 2016

Dear Sir/Madame:

RE: Draft REGDOC-2.1.2 Safety Culture

Thank you for the opportunity to comment on Draft REGDOC-2.1.2.

The current proposed scope seems reasonable, in my opinion it would be unreasonable to expand the scope of this REGDOC to apply to Nuclear Substances and Radiation Devices licences or Class II Nuclear Facility licences. Most healthcare institutions that I am familiar with do not have the resources to plan, assess, evaluate and report on Safety Culture every three years and some may even struggle to explicitly foster Safety Culture.

We recently saw in the draft *Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2015* that exposures to workers are relatively low and the majority of exposures do not approach a dose limit (member of the Public or Nuclear Energy Worker) and that 96% of reported events have been categorized at INES level 0.

My concern is that there may be a faction within CNSC staff that embrace this REGDOC to the extent that they feel it should be applicable to Nuclear Substance and/or Class II Nuclear

Facilities licences.

In closing, I do not believe that there is currently a reasonable justification to expand the scope of Draft REGDOC-2.1.2 such that it would be required for Nuclear Substances and/or Class II facilities licences.

Sincerely,

J. Dovyak

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