

From: Corns, Robert [mailto:rcorns@bccancer.bc.ca]

Sent: Wednesday, June 12, 2013 12:19 PM

To: Consultation

Subject: Draft REGDOC-2.2.3 Personnel Certification: Radiation Safety Officers

I've done a preliminary read of your draft regulation and have a couple of comments.

- 1) You have a typo. In Section 4.3.3 Certification Invalidation, you make reference to Section 4.5.2 – specifically:

The person has been away from RSO duties for an extended period of time, as described in section 4.5.2.

There is no section 4.5.2. Presumably this is what is covered in Section 4.4, but that needs to be clarified.

- 2) It was not clear in your application who is applying for the certification. Under licensee information, it states the licensee is applying for certification. But the certification is issued to the RSO?
- 3) If the 60 consecutive working days could be changed to say 90, this would make the administration and planning of sabbatical leaves easier. Many such leaves are taken over 3 month periods and are a common enough practice. The 60 day policy would be cumbersome with little practical gain over a 90 day period. It is highly unlikely a person would “forget more” or the program would not be correctly managed during a 90 day period as compared to a 60 day period.

These are my first impressions.

Robert Corns
Radiation Safety Officer
BCCA-Fraser Valley Centre