



June 27, 2013

VIA EMAIL

Mark Dallaire
 Director General
 Canadian Nuclear Safety Commission
 Regulatory Policy Directorate
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Dear Mr. Dallaire:

Cameco Corporation Comments on Draft Document RegDOC-2.2.3 Human Performance Management: Personnel Certification: Radiation Safety Officers

Further to the Draft Document RegDOC-2.2.3 Human Performance Management: Personnel Certification: Radiation Safety Officers, please find comments prepared by Cameco Corporation (Cameco) below.

By way of background, Cameco has operations within Canada that mine and mill uranium, refine uranium, convert uranium into fuel for CANDU and other reactors and manufacture fuel bundles for CANDU reactors. Across these operations, Cameco employs several radiation safety officers. Accordingly, in Table 1, we have outlined specific comments and recommendations related to this draft document.

Table 1: Comments and Recommendations to REGDOC-2.2.3

Section	Comment	Recommendation
3.3	Is it sufficient to have an assistant or deputy RSO present day-to-day rather than the RSO?	Request clarification that it is sufficient that assistant or deputy RSO is present on day-to-day basis.
4.3	This exam appears to be subjective and potentially dependent on the examiner rather than a defined set of requirements. This process does not appear to set clear expectations or define required knowledge that all RSOs must possess (text of document states	Standardize this exam to a defined syllabus that states the required knowledge of the RSO in express terms. This can allow for some tailoring (e.g. applicants only respond to questions about equipment used at their facility), but can clearly define the

	<p>the exam is tailored for each candidate and organization). Further, this would require the CNSC to judge site specific equipment and organizational policies/ procedures as well as individual academic and work experience, which the examiner may not have first-hand experience or knowledge of. An example of the problems this may present is if there is a situation of different interpretations of a company policy between the candidate and the CNSC examiner, who makes the decision on what the company’s intent was with the policy statement – the candidate from the company or the CNSC? Further, as written, it is extremely difficult for an individual to ensure that they have adequate training and preparation for this exam because its content is quite ambiguous. Finally, there is the issue of whether, as examiners and certifiers who individually tailor the exams, the CNSC is a position of responsibility or accountability for this individual and their abilities and actions.</p>	<p>expectations. Also, consider reliance on third party training courses, e.g. RSO 1 registration from RSIC or CRPA that may provide a method to meet some or all of the requirements.</p>
4.3.1.2	<p>As written, it appears that if a person receives a “Refusal to Certify”, then there is no opportunity, outside of the initial 30 days, to attempt to re-qualify as an RSO. This section gives the appearance that once refused an individual can no longer be an RSO at any future point in their career. Appendix A states that an individual could attempt to qualify for a different licensee, but no provision appears to be made to retake the examination for the same licensee. This seems overly restrictive and it is unclear why a person could re-apply with a different licensee but not the same one if they chose to at some future point in their career.</p>	<p>Clearly define in this section the minimum wait time to reapply for certification and clarify that a person can reapply with the same or a different licensee.</p>
4.3.1.2.1	<p>It is unclear why an individual only has 30 days to request a re-examination and further, it seems overly restrictive to issue a “Refusal to Certify” at this point.</p>	<p>Justify the reason for the 30 day time frame for reapplication or remove this restriction from the document.</p>
4.3.2		<p>Should clarify that scenario #3, “incapable of performing duties” does not include reasons listed in 4.4.2 for absence from duties.</p>

Appendix A and Appendix B	The basis for a 2-year wait period to attempt to become certified with a different licensee is unclear. Numerous training courses that could assist in improving a candidate's knowledge can be completed in well under 2 years. Further, as commented previously, it is unclear why can only reapply with a different licensee.	Remove the restriction to only reapply with a different licensee and/or state that the individual can reapply under any licensee. Also, remove or provide a rationale for a 2-year wait time in light of the potential to gain the required knowledge in a shorter timeframe.
Appendix B	The term "appropriate level of knowledge" is ambiguous.	To better define requirements for the RSO certification, it is recommended that an exam syllabus and predefined questions be developed rather than individually tailored exams.

Cameco looks forward to further opportunities to comment on this draft document as it is refined.

Finally, Cameco would be pleased to respond to any further questions that the Canadian Nuclear Safety Commission (CNSC) may have. Please contact the undersigned at (306) 956-6485 or kari-toews@cameco.com.

Sincerely,



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 Cameco Corporation

c. Regulatory Records - Cameco

