RE: Consultative Draft Documents RD-99.3 & GD-99.3

Thank you for the opportunity to comment on the RD-99/GD-99 suite of consultative documents. Our comments will be limited to GD-99.3 Guide to the Requirements for Public information and Disclosure and RD-99.3 Requirements for Public Information and Disclosure.

GD-99.3:

Section 2.1, 3rd Paragraph, 2nd sentence:

Instead of stating “certain Class II licensees”, this document should specifically identify which Class II Devices licence “use types” or licenced activities that are not required to have a formal public information and disclosure program.

RD-99-3:

It does not seem to be stated anywhere within this document that certain Class II licensees may not require a formal public information and disclosure program, as stated in GD-99.3.
Section 3 (r) of C2NFPER states with regard to an application to construct a Class II Nuclear Facility that the following information is also required: “the program to inform persons living in the vicinity of the site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the nuclear facility”.

The sixth paragraph of Section 2.3.1 of RD-99.3 however seems to require much more detailed, on-going information:

As a minimum, the protocol shall contain instructions, criteria and requirements with respect to the timely disclosure of:

• routine and non-routine releases of radiological and hazardous materials to the environment
• unplanned events, including those exceeding regulatory limits
• on a quarterly basis, the list of events reported to the CNSC or other regulatory body for that quarter
• environmental monitoring reports.

What is the overall regulatory basis for what could be an onerous requirement? Although Section 3 (r) of C2NFPER is what is quoted at the start of the document that regulatory extract does not appear to require an on-going program.

It may be excessive to require reporting of routine releases to the environment – the likelihood of routine releases to the environment would have been included with the public notifications that were done with regard to the Licence to Construct application.

“Unplanned events” are mentioned in the 2nd bullet but not specifically identified.

The types of events that are “reportable” to CNSC are diverse and do not only include events that may impact on public or environmental safety. The 3rd bullet may be overly broad and consideration should be given to refining that requirement to only include events that may have an impact on the public or the environment.

Sincerely,

J. Dovyak
Jeff Dovyak RTNM, CRPA (R)
Radiation Safety Coordinator
WRHA

Shadreck Mzenieza PhD
Director & RSO
Winnipeg Cyclotron Facility