

Comments received during first round / Commentaires reçus lors de la première période :

**REGDOC-2.2.3 - Personnel Certification: Radiation Safety Officers / REGDOC-2.2.3 – Accréditation du personnel: Responsables de la radioprotection**

**Comments received from public consultation / Commentaires reçus dans le cadre du processus de consultation**

Comments received:

- during first round (April 29 to June 28): 65 distinct comments from eight (8) reviewers
- during feedback period (July 16 to August 17 (15 working days)): 1 comment from 1 reviewer was received

Commentaires reçus :

- lors de la première période (du 29 avril au 28 juin) : 65 commentaires distincts reçus de huit (8) examinateurs
- lors de la période des observations (du 16 juillet au 7 août (15 working days)) : 1 commentaire reçu de 1 examinateur

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	Section	Organization	Comment	CNSC Response
1.	General	Association québécoise des physiciens médicaux cliniques	Ce document est bien écrit et présente clairement les éléments constituant le processus d'accréditation. Il représente fidèlement le processus déjà en place de l'accréditation des RRP.	Merci de votre commentaires
2.	General	Réseau de santé Vitalité Health Network	En général, je trouve le document claire et précis. Les détails des exigences nécessaires pour obtenir l'accréditation sont claires.	Merci de votre commentaires
3.	General	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	There are other RSO roles, not associated with Class II facility – avoid confusion. Change title to: Personnel Certification: Radiation Safety Officers, Class II Nuclear Facilities	While the title of Radiation Safety Officer is frequently used in various sectors throughout industry, the only reference in the CNSC regulatory framework is within the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> . Therefore the only licensees currently subject to the RSO certification requirement are those operating or servicing Class II facilities.  Nevertheless, for greater clarity, the title will be amended.
4.	General	Robert Corns Radiation Safety Officer BCCA-Fraser Valley Centre	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?	It is the licensee who proposes a candidate for certification as RSO. The application therefore requires licensee and candidate information.  The certificate is sent to the licensee with copy to the RSO.

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				Text added to section 4.1 to clarify that it is the licensee actually making the application.
5.	General	Atomic Energy of Canada Ltd	<p>It is noted that the existing Class I Nuclear Facilities Regulations do not require Class I Nuclear Facilities to have a person appointed and certified as a Radiation Safety Officer (RSO). This lack of requirement for an RSO, or equivalent, is further reflected in licences and associated licence condition handbooks, such as those applicable to AECL's Chalk River Laboratories (CRL), where there is no specific condition for an RSO. Licensees for complex sites, such as CRL, will have both a well developed and long established radiation protection program and an N286 compliant management system that ensures a commensurately high level of radiological safety. For all practical considerations of safe operational radiation practices at complex operational sites, it appears completely reasonable for the draft regulatory document to include an exemption from RSO appointment and certification requirements.</p> <p>Any imposition of requirements for a certified RSO for the Class II Nuclear Facilities at the Chalk River site will significantly increase costs for training and associated maintenance of certification requirements, with no apparent net benefit in radiological safety. Indeed, AECL considers that possibly quite the reverse effect may initially be experienced with confusion arising with respect to the responsibilities and accountabilities for radiological safety that are well established under the current radiation protection and management system programs. AECL therefore requests that, in lieu of a possible future revision of the Class II Nuclear</p>	<p>Section 15.12 of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> exempt class II licensees from certifying a Radiation Safety Officer provided the person can fulfill the role of a Radiation Safety Officer for class II facilities and is certified in accordance with subsection 9(2) of the <i>Class I Nuclear Facilities Regulations</i>.</p> <p>For clarification, if a licensee has Class I and Class II facilities at the same location, and there is already a person onsite who is certified in accordance with section 9(2) of the <i>Class I Nuclear Facility Regulations</i>, and that person can fulfill the role of an RSO for a Class II facility (has equivalent duties), the licensee does not need to have a certified RSO in accordance with the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i>.</p> <p>This is the only existing exemption from having a certified RSO under the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i>.</p> <p>Any modification to this requirement or any additional exemptions require a regulatory amendment and cannot be done through a regulatory document.</p> <p>Some text added to section 1.3 to attempt to clarify this exemption.</p>

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			Facilities and Prescribed Equipment Regulations, Section 1.3 of the regulatory document be revised to exempt licensees who have both Class I and Class II Nuclear Facilities at the same location and operating under the same licence, from the requirements to appoint and certify RSOs.	
6.	Preface	Agriculture et Agroalimentaire Canada	Section Préface : 2 ème paragraphe : La première phrase n’a pas de sens, « ... énonce les directives à aidera les demandeurs à préparer... » devrait être reformulé.	La correction a été faite dans le document.
7.	1.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	<p>The document provides an exemption to Class II Nuclear Facilities (NF) for those RSO who are already certified under Class I NF Regulations. However, it is not clear if an exemption exists for Class II NF for those who are already certified under section 15.01 to 15.06 of the Class II NF Prescribed Equipment Regulations.</p> <p>- Please clarify exemption status for RSO of Class II NF who are currently certified under section 15.01 of the Class II NF &amp; Prescribed Equipment Regulations.</p> <p>- Please clarify what is meant by “exempt”. Does it mean certification without examination, or is certification not required.</p>	<p>The document does not provide the exemption. The exemption is provided by the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i>. Section 1.3 has been rewritten to more closely mirror section 15.12 of those regulations. The exemption applies only if the licensee has a person who has duties equivalent to those of a class II RSO <u>AND</u> is certified in accordance with section 9(2) of the <i>Class I Nuclear Facilities Regulations</i>.</p> <p>Those persons already certified under the <i>Class II Nuclear Facilities Regulations</i> will remain certified. This document does not introduce new requirements, but simply details what is required in an application and outlines the process for certification.</p> <p>Should their certification be revoked or invalidated, they will have to reapply and go through the process as outlined in this regulatory document to become certified again as an RSO.</p> <p>- “Exempt” refers to exemption from section 15.01 of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i>; i.e., a class II RSO need not be appointed, and therefore certification is not required.</p>

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8.	1.3	Association québécoise des médecins cliniciens	Notre compréhension de l'article 1.3 est qu'une accréditation pour une installation de catégorie 1a préséance sur celle d'une installation de catégorie II. Si tel est le cas, nous en sommes perplexes. Le présent document met l'accent sur l'importance d'obtenir une accréditation spécifique au type d'installation que possède le titulaire de permis de catégorie II (article 4.3.3). Nous comprenons mal pourquoi une accréditation pour une installation nucléaire de catégorie I donnerait automatiquement une accréditation pour une installation nucléaire de catégorie II et soustrairait ce RRP des exigences décrites dans le présent document.	<p>La section 1.3 énonce l'exemption qui existe dans le <i>Règlement sur les installations nucléaires et de l'équipement réglementé de catégorie II</i>.</p> <p>Cette exemption a été ajoutée pour les cas où un titulaire de licence a des installations ou de l'équipement de catégorie I et de catégorie II sur le même site.</p> <p>Les personnes accréditées en vertu du paragraphe 9(2) du <i>Règlement sur les installations nucléaires de catégorie I</i> sont soumises à un processus d'accréditation semblable à celui décrit dans le présent document.</p> <p>Malgré les différences entre les installations et l'équipement de catégorie I et de catégorie II, il peut y avoir chevauchement des connaissances et des tâches d'un RRP, et un titulaire de permis désignerait pas une personne comme un RRP pour l'installation au complet (catégorie I et catégorie II) si elle n'était pas en mesure d'accomplir les tâches du poste.</p> <p>Les installations de catégorie I visées par l'exemption sont appuyées par un système de gestion assujetti à la surveillance et à l'approbation de la CCSN. Le processus de formation et de qualification des personnes nommées à un poste critique pour la sûreté est également soumis à un examen minutieux sur le plan réglementaire. Par conséquent, la CCSN doit s'assurer de nommer une personne dûment qualifiée au poste de RRP d'une installation nucléaire de catégorie II.</p> <p>La CCSN tiendra quand même compte de ce</p>

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				commentaire au moment de la prochaine révision de la réglementation.  Aucun changement.
9.	2.0 (General)	Réseau de santé Vitalité Health Network	Par contre, il y a seulement un point qui me porte à confusion. À la section 2 (page2), les responsabilités du RRP sont énoncées. La dernière est « servir de signataire autorisé pour les permis de la CCSN ». Les termes suivants, « mandataire », « signataire autorisé », « personne autorisée à signer au nom du demandeur », « responsable de la demande » , ont tous été utilisés dans les formulaires de demandes de la CCSN. Sans définition claire, il a toujours été difficile pour moi de savoir de qui on discutait. Est-ce que c'est le Responsable de radioprotection? Est-ce que c'est la personne qui remplit le formulaire? Est-ce que c'est le membre de la haute gestion qui représente le titulaire de permis? Je crois qu'il serait utile de clarifier et de standardiser les termes utilisés pour les individus qui doivent signer les demandes. Comme exemple, si vous regardez à la section 5.4 (page 10) du document d'accréditation des RRP, on indique que la demande doit être signée par le signataire autorisé. Or, puisque à la section 2, le RRP est identifié comme signataire autorisé, est-ce qu'il peut signer sa propre demande? Le formulaire utilise même un autre terme à la partie D, soit « Mandataire du demandeur ». Vous comprendrez donc ma confusion.	Les termes « signataire autorisé » et « personne autorisée à signer au nom du demandeur » sont définis dans le glossaire.
10.	2.0 Second bullet	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Managing is not defined in the document and has a different meaning to industry than implied. Replace “managing” with “oversight”	Agreed.  Change made.

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11.	2.0	Agriculture et Agroalimentaire Canada	Section 2 Responsable de la radioprotection : au point 8 je spécifierai qu'il s'agit de la réglementation relative à l'installation nucléaire	Les changements ont été faits pour spécifier que le RRP a l'autorité pour arrêter toute activité en lien avec l'exploitation de l'installation de catégorie II ou l'entretien d'un équipement réglementé, qui est susceptible d'entraîner un cas de non-conformité à la réglementation.
12.	2.0	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Missing responsibility for interpretation of regulations, policies and procedures. Add point 11 "Interpreting the regulations, policies and procedures applicable to radiation protection and for providing programmatic approvals where required."	These responsibilities are included in those already defined.  No change.
13.	2.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	First paragraph, second sentence states: "An RSO may delegate some responsibilities or tasks to an assistant with appropriate qualifications to carry out designated duties; however, the oversight of the radiation safety program remains with the certified RSO" Suggested wording "An RSO may delegate some responsibilities or tasks to an assistant with appropriate qualifications to carry out designated duties; however, the oversight of radiation safety remains with the certified RSO" Otherwise for large corporation such as OPG this would not be an accountability of RSO.	Agreed.  Change made as suggested.
14.	3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	This entire section has no relevance to the certification of an RSO. If there is a need to convey information on regulation interpretation include as an appendix.	Agreed.  Section moved to appendix.
15.	3.3	Association québécoise des médecins cliniques	« ... tel qu'exigé au paragraphe 15.04 (b) des règlements, s'il... » Il faudrait être plus spécifiques et indiquer à quels règlements il est fait référence. Il est peu probable que plusieurs règlements indiquent la même information au même numéro d'article 15.04 (b) !	La text a été modifiée pour clarifier. Référence au paragraphe 15.04 (b) du <i>Règlement sur les installations nucléaires et de l'équipement réglementé de catégorie II</i> .

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16.	3.3	Association québécoise des physiciens médicaux cliniques	«... il devrait y avoir un RRP accrédité sur le site ... sur une base quotidienne. » L'accord du verbe au conditionnel est important étant donné qu'il n'existe pas d'exigence réglementaire précise pour avoir sur place et sur une base quotidienne un RRP accrédité. Il ne faudrait pas qu'une mise en application de ce souhait empêche l'absence simultanée des RRP d'une même installation, étant donné que l'article 4.4 prévoit un mécanisme de remplacement temporaire du RRP.	<p>Agree with your statement.</p> <p>Yes it is correct that there is no requirement that an RSO must be on-site on a day-to-day basis, therefore the verb “should” is used instead of “must”. While there is no requirement, as mentioned in section 3.3, the CNSC is of the opinion that a RSO would not be capable of performing their duties if they were not on-site at the time of the licenced activity.</p> <p>An RSO can be absent from a site if a temporary replacement is designated in accordance with 15.11 of the Regulations.</p> <p>Aucun changement.</p>
17.	3.3	Association québécoise des physiciens médicaux cliniques	Sachant que l'utilisation d'une installation nucléaire de catégorie II est fréquente pour le traitement d'urgences médicales en dehors des heures normales d'opération de l'installation, et que la présence du RRP n'est pas systématiquement requise lors du traitement de ces urgences, le souhait manifesté par la CCSN est difficilement applicable.	La section a été modifiée pour indiquer qu'un RRP doit être sur place durant les heures normales d'exploitation.
18.	3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Applicable if section is added as an appendix. Reference 15.04(b) not referenced in section 1.4. Add to section 1.4.	<p>Section 1.4 , point 9 includes the regulatory reference to section 15.04(b): “Sections <b>15.03 to 15.12</b> of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> lists several other RSO requirements for every licensee operating a Class II facility or holding a Class II servicing licence.”</p> <p>No change to document.</p>
19.	3.3	Cameco	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.	The <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> include the requirements for certifying a Radiation Safety Officer. Each licensee who holds a class II operating or service licence must have a certified RSO and <i>may</i> have multiple RSOs however there is no provision in the regulations for

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				<p>different categories of RSO (assistant, deputy, corporate, provincial, etc) -- these designations are constructs of the licensee's organization. From the CNSC's perspective each RSO is equally responsible for radiation safety related to class II activities for which they are certified.</p> <p>Section 3.3 states that "there should be, at a minimum, one certified RSO working at the site of the licensed activity on a day-to-day basis". This accurately reflects the expectations of the CNSC.</p> <p>No change to document.</p>
20.	3.3 & 3.3.1	Ontario Power Generation	This RSO requirement only applies to Class II NF, so for OPG it is acceptable to have RSO located at one site (e.g. Whitby HPD & Lab) and the Class II facility is located at Darlington??	The RSO certified in accordance with the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> is expected to be capable of performing the duties of the position. Situations like the one described here are considered on a case by case basis but generally speaking there should be a certified RSO working at the site of the licensed activity on each day of normal operation.
21.	3.3 & 3.3.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Not sure what "contact" CNSC means? Please clarify "contact CNSC", is it in writing? Phone call adequate? What is the time frame? Is pre-acceptance required?	<p>Instructions for contacting the CNSC added to section 4. Reference to performance standards published on CNSC website added to section 4.</p> <p>Section 3.3.1 modified to indicate that the licensee is advised to contact the CNSC prior to submitting an application for certification. Since there is no regulatory requirement for "pre-acceptance" only guidance can be provided in this regard.</p>
22.	4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	No standard provided for conduct of the oral examination or exam preparation standard. Add section to detail, reference another standard or add details to appendix.	All processes used within the CNSC are periodically assessed to evaluate and improve performance as per the CNSC management system. Applicable standards, if any, for the conduct of certification exams may be used as assessment criteria in the next assessment of this process.



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				No change in this revision of the document.
23.	4.3	Nordion Canada Inc.	It is recommended that more detail be provided in the regulatory document regarding the development of the oral examination questions. As per section 4.3 Examination, the content of the examination is to be tailored to the operational risks of the licensed activity and equipment. Given that an RSO certification is associated with the type of licensed activity, it is suggested that questions posed during the oral examination for un-related activities be excluded. For example, questions related to x-ray machines are unsuitable for a candidate being assessed for knowledge as it relates to the position of RSO at an irradiator facility, or questions related to cyclotrons are unsuitable for a candidate at a linear accelerator facility.	The licensed activities are considered when the exam is prepared. Tailored, in this context, means that only questions relevant to the licensed activities specified in the application will be chosen. No change
24.	4.3	Cameco	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 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 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,	A single defined syllabus is not a practical option given the broad nature of class II licensees operating in medical, industrial, commercial and academic sectors. The topics subject to examination are described in the “Candidate Qualifications” appendix. The RSO certification requirements in the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> do not preclude the use of a third party examiner. This option may be explored in the future particularly if the volume of RSO certifications increases significantly. RSO certification is required for licensees holding operating and/or service licences. Both licences require submission of relevant policies and procedures. The clarity of the procedures is determined at time of licensing by the project officer performing the technical assessment. If changes are required, they are normally requested at this time. Examination content involving

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			<p>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, the CNSC is a position of responsibility or accountability for this individual and their abilities and actions.</p> <p>Suggestion: 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 expectations. Also, consider reliance on third party training courses (e.g. RSO 1 registration from RSIC or CPRA ) that may provide a method to meet some or all of the requirements.</p>	<p>the licensee’s radiation safety program (policies &amp; procedures) would only be determined after the program has been reviewed in the assessment of the licence submission therefore there should not be any differences in interpretation between the licensee representatives and the CNSC examiners.</p> <p>The <i>Nuclear Safety and Control Act</i> gives the CNSC the authority to “certify and decertify persons...as qualified to carry out their duties under this Act...” (section 21(1)(i)). The CNSC is therefore authorized to certify that the candidate is capable of performing the duties of RSO related to radiation safety involving CNSC-licensed activities.</p> <p>No change.</p>
25.	4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	No timelines provided for notice or request for examination. With respect to application. Add process to request examination or timeline on when/how examination follows application.	Reference to performance standards published on CNSC website added to section 4.
26.	4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	<p>The first two bullets of the exams content conflicts/ is not as descriptive as Appendix A. Replace first two bullets with the five points notes in Appendix A:</p> <ul style="list-style-type: none"> <li>- relevant provisions of the NSCA and its ensuing regulations</li> <li>- principles of radiation safety</li> <li>- radiation physics</li> <li>- operational activities and facilities which are to be licenced by the CNSC</li> <li>- Radiation Protection Program of the facility</li> </ul>	<p>Agreed.</p> <p>Five points listed added to section 4.3.</p>

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27.	4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Flow has gaps and timeline unclear. Provide a flow chart of process, indicating times between steps (min and max) and references to applicable section of the REGDOC.	The general steps of the certification process are clearly described in section 4.1, with references to additional guidance found in other sections of the document. A reference to service standards published on CNSC website added to section 4.
28.	4.3.1.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Referenced 15.07 but not referenced in section 1.4. Reference in section 1.4.	Section 1.4, point 9 includes the regulatory reference to section 15.07: “Sections <b>15.03 to 15.12</b> of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> lists several other RSO requirements for every licensee operating a Class II facility or holding a Class II servicing licence.” No change to document.
29.	4.3.1.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Lack of remedial process. Provide a remedial process to close a knowledge gap found in narrow area. Similar to the process available for Certified HP (RD204)	After an unsuccessful examination attempt, areas of weakness are identified by the CNSC for the candidate. It is expected that candidates interested in attempting the examination again will focus on identified gaps prior to any subsequent examination attempt. Text added to explain this expectation of the CNSC.
30.	4.3.1.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Needs to be clear on reapplication or other means to be re-examined at a later date. Provide details on reapplication/re-examination at a later date.	There is no difference between an initial application for certification and an application following refusal to certify. Additional text added for clarification in section 4.4.1.2 (previously 4.3.1.2).
31.	4.3.1.2	Cameco	As written, it appears that if a person receives a “Refusal to Certify”, then there is no opportunity, out side 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	If an individual receives a “Refusal to Certify” they can reapply at any time. The information provided by the CNSC in the “Refusal to Certify” should provide information as to what additional experience/training/knowledge is required by the candidate in order to successfully complete the examination and become certified. Agreed. There is no minimum wait time for a candidate to apply for certification following refusal to certify. Section 4.3.1.2.1 (Re-examination) removed.

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			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. Suggestion: 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.	Two-year wait period and paragraph indicating that the candidate can only reapply with a different licensee removed from Appendix A.
32.	4.3.1.2.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	No indication as to when a candidate can reapply. Provide language to support when a candidate can reapply.	Section 4.3.1.2.1 (Re-examination) removed since re-examination is conducted prior to refusal to certify as per section 4.3.1.
33.	4.3.1.2.1	Cameco	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. Justify the reason for the 30 day time frame for reapplication or remove this restriction from the document.	Section 4.3.1.2.1 (Re-examination) removed. Licensee and candidate may reapply at any time.
34.	4.3.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Point 3 – “ the RSO is otherwise incapable of performing duties” is covered by section 4.3.3. Remove point 3.	Agreed. Point 3 removed.
35.	4.3.2	Cameco	Should clarify that scenario #3, “incapable of performing duties” does not include reasons listed in 4.4.2 for absence from duties.	Agreed. Point 3 removed.
36.	4.3.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Reason or basis not documented. Add sentence: Basis for revocation will be documented to make clear what is required for reapplication in section 4.3.2.1.	4.4.2.1 (previously 4.3.2.1) specifies that a person may request certification following decertification if “the basis for the decertify person is no longer applicable” i.e. the licensee or candidate can demonstrate that the basis for the decertification decision has been addressed.  Similar text to that suggested added to document for clarity.
37.	4.3.2	Ontario Power Generation	“ if for any reason, a certified RSO is decertified by the CNSC, that person must wait three years before being eligible for certification again.” Does not belong and contradicts direction provided elsewhere in the	Sentence regarding wait times moved to section 4.4.2.1 (previously 4.3.2.1).

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	Section	Organization	Comment	CNSC Response
			document. Remove sentence from 4.3.2. Rewrite and include in section 4.3.2.1 to specify wait period and limits, and the basis/issue that needs to be dispositioned before “may reapply”	
38.	4.3.2	Atomic Energy of Canada Ltd Bruce Power	<p>“ if for any reason, a certified RSO is decertified by the CNSC, that person must wait three years before being eligible for certification again.” Does not belong and contradicts direction provided elsewhere in the document. Remove sentence from 4.3.2. Rewrite and include in section 4.3.2.1 to specify wait period and limits, and the basis/issue that needs to be dispositioned before “may reapply”</p> <p>MAJOR COMMENT: This action could lead to prolonged shutdown of a Class II Facility.</p>	<p>Sentence regarding wait times moved to section 4.4.2.1 (previously 4.3.2.1).</p> <p>Regarding MAJOR COMMENT;</p> <p>As specified in the Regulations (section 15.01) all class II facilities must appoint a certified RSO. The RSO is a critical position that is a key element to ensuring the safety of the facility and protection of workers and the public. As outlined in 4.4.2, an RSO would only be decertified if, in the opinion of the CNSC, there was</p> <ul style="list-style-type: none"> <li>- evidence of significant or wilful non-compliance with NSCA, or the regulations made under the NSCA</li> <li>- evidence of incompetence</li> </ul> <p>Evidence of these actions could put into question the safety of the facility and the protection of the workers and the public.</p> <p>The CNSC will take whatever measures necessary to ensure the safety of the facility and protect workers and the public.</p> <p>In the event an RSO is decertified, there are provisions for a temporary replacement for up to 60 working days that could allow for the certification of another RSO for the facility.</p>
39.	4.3.2.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Title change. Change title to “certification following revocation”	Agreed. Change made.
40.	4.3.2.1	Ontario Power Generation Atomic Energy of Canada Ltd.	Lack of clarity in what is required: “request to be certified again”. Replace with - A person	Agreed. Change made.

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	Section	Organization	Comment	CNSC Response
		Bruce Power	who has their certification revoked may reapply again if: 1- the basis of for revocation is no longer applicable 2 – the person successfully passes the requirements for certification.	
41.	4.3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Referenced 15.05 but not referenced in section 1.4. Reference in section 1.4.	Section 1.4, point 9 includes the regulatory reference to section 15.05: “Sections <b>15.03 to 15.12</b> of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> lists several other RSO requirements for every licensee operating a Class II facility or holding a Class II servicing licence.”  No change to document.
42.	4.3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Missing scenario. Add to scenarios – being incapable of performing duties from section 4.3.2	Agreed. Change made.
43.	4.3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Documentation of basis for invalidation. Add a paragraph requiring the documentation of the basis for invalidation and the requirements to correct this basis for section 4.3.3.1.	Certificates are not invalidated by the CNSC but rather by a change in circumstance. The CNSC is typically notified by the licensee of the change in circumstance therefore the documentation for the basis for invalidation is provided by the licensee.  This is not the same as decertification. There is nothing that needs to be “corrected” by the licensee.  Due to changes in circumstances (i.e. new equipment, lengthy absence, change in location/facility) the licensee may need a new RSO or the CNSC must determine if the current/existing RSO is still qualified to perform their duties,  No change to document.
44.	4.3.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Bullet 4 – “ the person has been away from RSO duties for an extended period of time, as described in section 4.5.2” The referenced section 4.5.2 does not exist, should likely be 4.4 Tracking of certificate status can be confusing	Agreed. Reference changed to section 4.4.2.  Certificates are not invalidated by the CNSC but rather by a change in circumstance. The CNSC is typically notified by the licensee of the change in circumstance therefore the documentation for the basis for

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			<p>or difficult to manage. There should be formal correspondence between CNSC and licensee to document certificate status. For example, if a certificate is invalid for the reasons listed in this section, then the CNSC should notify the licensee via letter/email rather than leaving the certificate status open ended.</p> <p>Suggestions:</p> <ul style="list-style-type: none"> <li>- Change reference from 4.5.2 to 4.4</li> <li>- Clarify how certificate status changes will be managed by the CNSC and how these changes will be communicated to licensees.</li> </ul>	invalidation is provided by the licensee.
45.	4.3.3	Robert Corns Radiation Safety Officer BCCA-Fraser Valley Centre	<p>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”</p> <p>There is no section 4.5.2. Presumably this is what is covered in section 4.4, but that needs to be clarified.</p>	Agreed. Reference changed to section 4.4.2.
46.	4.3.3.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Title does not match 4.3.3. Re-title to match language in 4.3.3 “Recertification following invalidation”	Agreed. Change made.
47.	4.3.3.1	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Unclear and open ended. Add the following sentence at the end of last paragraph in section 4.3.3.1 “ Documented and agreed to by the licensee at the time of invalidation”	<p>Invalidation of a certificate is automatic based on a change of circumstances described in section 4.3.3. Certification following invalidation follows the same certification process as with initial certification requests (except that the examination may not be required).</p> <p>No change.</p>
48.	4.3.5	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Process timelines confusing. As previously noted, suggest the creation of a flow chart to illustrate the timeline.	Reference to performance standards published on CNSC website added to section 4.
49.	4.4.1.1	Association québécoise des physiciens médicaux cliniques	La notion de «jours ouvrables» dans le contexte d'une installation nucléaire de catégorie II	Le terme “jours ouvrables” est utilisé dans le paragraphe 15.11 du <i>Règlement sur les installations</i>

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			<p>devrait être mieux définie.</p> <p>La planification à l'avance de l'utilisation d'un équipement réglementé de catégorie II prévoit généralement une utilisation quotidienne de 5 jours par semaine. Incluant l'utilisation de l'équipement réglementé pour la délivrance de traitements d'urgences médicales, une installation nucléaire de catégorie II pourrait être ouverte 7 jours par semaine.</p> <p>Fait-on référence aux jours ouvrables planifiés (exemple, lundi au vendredi) ou fait-on référence aux jours possiblement ouvrables (exemple, dimanche au samedi) ou fait-on systématiquement référence aux jours ouvrables correspondant à tous les jours du calendrier? Pour plus de clarté, nous proposons de ne pas faire référence aux jours ouvrables, mais aux jours du calendrier. Ainsi 60 jours ouvrables (lundi au vendredi) correspondent à environ 90 jours du calendrier ou 3 mois civils.</p>	<p><i>nucléaires et de l'équipement réglementé de catégorie II</i>. Il fait donc référence au terme légale qui correspond aux jours ouvrables du calendrier.</p> <p>L'horaire du RRP ne prévoit pas de travailler 7 jours semaine même si l'installation fonctionne tous les jours. Les jours dans l'horaire où le RRP n'est pas présent ne constitue pas une absence. Une définition du terme absence a été ajoutée dans le glossaire.</p>
50.	4.4.1.1.1	Robert Corns Radiation Safety Officer BCCA-Fraser Valley Centre	<p>If the 60 consecutive working days could be changed to say 90, this would make 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.</p>	<p>The 60 working day limit is specified in the regulations. An amendment would be required to change this limit.</p> <p>The CNSC will take this comment under advisement and consider it when the regulations next come up for review.</p> <p>No change.</p>
51.	4.4.2	Association québécoise des physiciens médicaux cliniques	<p>Est-il nécessaire de lister les cinq raisons? Ne faut-il pas être accrédité de nouveau peu importe les raisons menant à l'arrêt de l'exécution des tâches quotidiennes du RRP pour une période supérieure à 13 mois? L'emploi d'une liste restreinte ouvre la porte à</p>	<p>La liste essaie de considérer les scénarios les plus courants qui mènent à une absence prolongée sans nécessairement invalider l'accréditation.</p> <p>La première phrase a été modifié pour «Si une personne</p>



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			d'autres raisons non listées où un RRP n'exerce plus ses tâches quotidiennes de RRP pour plus de 13 mois, et de ce fait non assujetti à la ré-accréditation.	n'a pas exercé les fonctions de RRP pour les raisons suivantes sans en exclure d'autres.»
52.	4.4.2	Agriculture et Agroalimentaire Canada	Section 4.4.2 Absence prolongée : La période de 13 mois me semble un peu courte, je suggérerai 24 mois. Par exemple une grossesse avec retrait préventif implique automatiquement un renouvellement d'accréditation. Par contre, une nouvelle accréditation pourrait être demandée si des changements importants aux procédures ou à l'installation ont été apportés durant l'absence. Ce changement entraînerait d'autres corrections dans le texte	<p>4.4.2 Absence prolongée. La période précisée dans le document devrait être assez longue pour couvrir divers types d'absences, y compris le congé parental, sans qu'il soit nécessaire de demander un renouvellement de l'accréditation du RRP. Après une absence de plus de 13 mois, un RRP risque de moins bien connaître les politiques et procédures nécessaires à la réalisation de ses tâches (surtout si celles-ci ont changé). Dans un tel cas, la CCSN doit demander une nouvelle accréditation afin de confirmer que la personne en question est toujours en mesure d'accomplir les tâches d'un RRP.</p> <p>La CCSN surveillera l'utilisation du document. S'il semble y avoir des problèmes, la période d'absence maximum de 13 mois sera revue dans les révisions subséquentes du guide.</p> <p>Aucun changement.</p>
53.	4.4.3	Association québécoise des médecins cliniques	<p>L'article 4.4.3 reprend faussement une information figurant à l'article 15.11 du <i>Règlement sur les installations nucléaires et l'équipement réglementé de catégorie II</i>. En effet, le règlement réfère à un temps de « 60 jours ouvrables sur une période de 365 jours consécutifs » et non à « 60 jours ouvrables consécutifs dans une période de 365 jours ». Cette distinction n'apporte pas les mêmes restrictions.</p> <p>Si le présent document désire apporter une interprétation au texte du règlement, ce fait devrait être clairement indiqué et la référence au règlement corrigée.</p> <p>À titre d'exemple d'une distinction qu'apportent</p>	D'accord. 4.4.3 a été modifié pour correspondre aux termes utilisés dans le règlement. « 60 jours ouvrables sur une période de 365 jours consécutif »

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			les deux libellés, une personne remplaçant un RRP pendant une période de 60 jours consécutifs a plus de probabilité de faire face à des décisions importantes de radioprotection qu'une personne remplaçant un RRP à raison d'une journée par semaine, plus deux semaines de vacances.	
54.	4.4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Referenced 15.1 but not referenced in section 1.4. Referenced in 15.11 but not referenced in section 1.4. Suggestion: Add regulatory reference to section 1.4.	Section 1.4, point 9 includes the regulatory reference to section 15.1: “Sections <b>15.03 to 15.12</b> of the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> lists several other RSO requirements for every licensee operating a Class II facility or holding a Class II servicing licence.”  No change to document.
55.	4.4.3.	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Qualified basis. Define qualified as being eligible and meeting the requirements to be a successful applicant for certification.	Agreed. Definition of qualified included in glossary.
56.	4.4.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	365 days? Should state the 365 days is a rolling 365 day period.	4.4.3 modified to match the language of the regulations i.e. “...a total of 60 working days in any <i>consecutive</i> 365 day period”.
57.	5.1 A.3	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Licensee info proof of legal status. In the case of corporation applying for certification of a potential RSO, such as OPG, the draft REGDOC requires submission of an “official corporation profile report”. The information in this report includes, but is not necessarily limited to corporation’s legal name, corp. #, date of incorporation, and registered office address. When OPG applies for the renewal of a PROL, similar corporate information is provided but not to the extent as required by draft REGDOC 2.2.3. For example; an “official corporate profile” is not required by any of the applicable regulations, nor is it provided information such as the applicants business name, address, corp. # and evidence that the applicant is the owner of the site are typical	This information is provided with licence application. It is therefore redundant to request it again for RSO certification. This requirement removed from the guide and the accompanying application form.

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	Section	Organization	Comment	CNSC Response
			<p>items that are provided.                      Suggestion:                      For corporations that are already licensed to operate Class I Nuclear Facilities, it is recommended that requirement to provide “official corporation profile report” be removed, and the information required to be submitted in this regards to be aligned to that which is required for applications pertaining to the aforementioned Class I Nuclear Facilities.                      Note: This requirement is better required for initial Class I Licence Application only.</p>	
58.	Appendix A	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	<p>The list of topics for examination do not align with section 4.3                      Suggestion: Align the list found in 4.3 with Appendix A page 11</p>	The topics for examination added to section 4.3. The parameters used to tailor the exam also remain.
59.	Appendix A	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	<p>Second to last paragraph implies one refusal will result in no further opportunities. Needs to align with section 4.3.1.2.1                      Suggestion: Add clarification wording that RSO needs remedial training for a new facility or option of replacement candidate.</p>	Language changed to “...and fails to demonstrate that they are qualified to be certified for this new facility type...”. This allows for a subsequent examination attempt. Failure of an exam would result in the same process as in the initial certification process.
60.	Appendix A	Cameco	<p>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.                      Suggestion: 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.</p>	Agreed. Reference to two year wait period removed.

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	Section	Organization	Comment	CNSC Response
61.	Appendix B	Cameco	The term “appropriate level of knowledge” is ambiguous. Suggestion: 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.	A single defined syllabus is not a practical option given the broad nature of class II licensees operating in medical, industrial, commercial and academic sectors
62.	Appendix B.2	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	Missing same language as found in B.1. Add to first sentence “ reviewed on a case-by-case basis”	Agreed. The following clause appended to the sentence: “...and will be reviewed for acceptability on a case-by-case basis”
63.	Glossary	Ontario Power Generation Atomic Energy of Canada Ltd. Bruce Power	None provided in the document. Add to document.	Agreed.  Glossary added.
64.	French Translation	Association québécoise des physiciens médicaux cliniques	Page i, 2 <sup>e</sup> paragraphe : Devrait lire « ... énonce les directives <u>qui aideront</u> les demandeurs... »	D'accord. Le document a été modifié.
65.	French Translation	Association québécoise des physiciens médicaux cliniques	Page 5, article 4.3.1.2, 2 <sup>e</sup> paragraphe: Devrait lire« ... le titulaire de permis ou le candidat <u>peut</u> demander d'être <u>entendu</u> , conformément. ... »	D'accord. Le document a été modifié.

**Comments received from feedback on comments / Commentaires reçus dans les observations sur les commentaires reçus :**

	Section	Organization	Comment	CNSC Response
1	General	Zach Ruitter	In the case of Shield Source, the RSO who was friendly enough, was certified by a two week training course, this needs to be acknowledged as an example where the regulator compromised safety by allowing such badly trained individuals to be certified with a two week course.	This is not licenced under the <i>Class II Nuclear Facilities and Prescribed Equipment Regulations</i> and therefore certification of the RSO is not needed.  Please be advised that the term “Radiation Safety Officer (RSO)” is used throughout the nuclear industry to describe those employees who are responsible for a licensee’s radiation protection program, but not all RSOs need to be certified by the CNSC.