



June 25, 2013

Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa, ON
K1P 5S9

Re: Comments on Draft Regulatory Document 2.2.3, Personnel Certification: Radiation Safety Officers

Nordion Canada Inc. has reviewed the draft regulatory document REGDOC-2.2.3, Personnel Certification: Radiation Safety Officers and offers the following comment regarding RSO certification for Class II Nuclear Facilities and Prescribed Equipment.

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, question 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.

Sincerely,

Rick Beekmans
Director, QA EHS Compliance
Nordion Canada Inc.