

**CNSC/ Industrial Radiography Working Group Meeting  
October 11, 2017  
CSNC Ottawa Laurier Office 410 Laurier Ave West  
Ottawa, ON**

**Attendees**

C. Moses (CNSC)  
H. Rabski (CNSC)  
P. Fundarek (CNSC)  
K. Mayer (CNSC)  
L. Simoneau (CNSC)  
A. Brady (TISI)  
T. Levey (Acuren)  
B. Bizzarri (GB Contract Inspection) - teleconference  
C. Auzenne (QSA Global)

**Absentees**

P. Larkin (CNSC)  
P. MacNeil (A-Tech)

**Chair of the Meeting**

**Co-Chair**

K. Mayer

A. Brady

K. Mayer opened the meeting at 9:05 am.

The agenda was adopted as proposed.

**Review/Adoption of Previous Minutes**

Minutes from the last meeting (February 07, 2017) were emailed to all members prior to the meeting. Everyone found the minutes acceptable as distributed.

P. Fundarek put forth motion to adopt the minutes; the motion was confirmed by A. Brady.

The action list was reviewed and updated accordingly.

**15WGM1.2 Follow up with Regulatory Docs division for an update on the status/progress of REGDOC 2.5.5 and communicate the status to the working group until consultation/publication – FEBRUARY 2018**

The writing team is in the process of dispositioning the comments received from the consultation and updating the final document for publication. It is on track for publication for winter 2018. An update will be provided at the next meeting.

**15WGM2.3 Check with Coms division at CNSC for options for videotaping, protocol for live feed, etc. – FEBRUARY 2018**

There were some technical difficulties (issues) with using WEBEX for the Ottawa meeting in May 2017; but overall comments received were dispositioned; it was a good experience. It was not possible to record but we may be able to do something more next year.

It would be good to do a cost analysis to see if there is real benefit or gains. The one benefit is to have the ability to share the case studies for both Eastern and Western meetings with everyone.

K. Mayer will meet with Coms and Video people at CNSC to see what our options are or even for improving WEBEX capabilities for the spring 2018 meetings and report back to IRWG in February 2018.

**15WGM2.4 Industry (CIRSA) to check with community colleges for possible contract for video opportunities- MARCH 2018**

A Brady updated on CIRSA using the Go Pros at the spring meeting, it was not a success. There was a lot of movement and the sound was terrible. As a result, CIRSA will reach out to community college to see if this is a possibility. They will try to reach out to them early to see about availability for May 2018 and will report back to the group in the winter.

**15WGM2.5 Reach out to Licensees (Syncrude and Suncor) to see if interest in presentation at annual meeting – FEBRUARY 2018**

There was great success with Syncrude and everyone enjoyed the presentation at the spring 2017 meeting. K. Mayer will also reach out to other clients, maybe an Eastern client and licensees to get someone else for the next meeting. Syncrude may be able to provide some more contacts for other companies.

**Action item** – K. Mayer will communicate with Suncor to solicit their interest and reach out to Syncrude for ideas.

**16WGM1.1 Invite potential IRWG member to attend next working group meeting- FEBRUARY 2018**

K. Mayer will invite new potential member to February 2018 meeting.

**In reviewing the action items and discussing scheme committee updates and CEDO certification, it was decided that J. Sigetich, Director PCD (CNSC) would be a great addition to the IRWG as a new member. A vote amongst the members was done on the spot (Fist of Five methodology) and everyone agreed and voted to have J. Sigetich join the group.**

### **CNSC/Regulatory Updates (CNSC Management)**

- C. Moses mentioned that the current focus is for the preparation for the Commission meeting for the presentation of the DNSR Regulatory Oversight Report (ROR) which is essentially a summary of all Designated Officer actions and regulatory activities carried out and managed by DNSR staff. This is the seventh year of the ROR at the Commission meeting. C. Moses provided details on the process for the meeting, in that, the ROR presentation on October 12<sup>th</sup>, 2017 will take about 50 minutes to deliver with 10 minute intervenor presentations (CRPA, CIRSA, CELA and Algonquin's of Ontario (written submission only). After the intervenor presentations there will be specific Q&A for the intervenors and then the Q&A session will take place for the CNSC staff presentation. The questions will be responded to by the intervenors and CNSC staff and chaired by the President.
- C. Moses asked that everyone be open, honest and frank with their presentations and questions and answers as well as he thanked everyone for their engagement.
- With respect to the Q&A session – there will be approximately two or three rounds from the Commission members. There are several new members, currently Dr. McEwen (nuclear medicine background), Dr. Demeter (nuclear medicine, medical/academic background), Mr. Seeley (business background) and Dr. Sullivan (engineering – power reactor safety background). The above are mostly part time members for one year terms. Hopefully the process will be completed in spring 2018 and there will be a fresh Commission. There will likely be a new President as well as both Dr. Binder and Dr. McEwen are coming up for renewal/expiry soon. The change in CNSC President will bring new corporate direction. There should not be much impact on the day to day CNSC operations.
- The disposition table of the ROR comments will not discussed in detail; if the Commission asks, CNSC staff will provide more detail.
- The Commission may bring an issue up to have it put on record (recorded on the transcript). There will be no formal decision making at the Commission meeting.
- With respect to posting information on the website or sharing with stakeholders, the information needs to be reviewed and bilingual. We are taking small baby steps with respect to inspection reports to see what can be made available to the public. The volume of information, language restrictions and complexities for public information are proving to make the process more difficult, however, the initiative is to make as much information available as possible.

- Industry would like to see what is trending, they do not want to see all inspection reports but rather the events and this has been asked year after year. C. Moses added to sharing events, he has interests in doing this but again we are facing lots of complexities and are taking baby steps to overcome them. CNSC staff has introduced a list of all reported events in 2016, however we realize that the report is not produced until 2017.
- The CNSC is very aware of the USNRCs practice to share all information on events. C. Auzenne added that although the information is communicated to stakeholders it is by far not perfect by any means. In Canada, the information impediments found in regulations and laws in Canada hold us back from publishing the information.
- C. Moses discussed that there will also be a CNSC staff presentation at the Commission meeting on Radiation Safety Officers (RSO) which will discuss certification and requirements for more complex programs. The goal is to develop a process to manage radiation protection programs across more complex organizations with multiple locations. C. Moses encouraged everyone to stick around in the afternoon for this presentation.
- At this time, CNSC staff is not proposing certification but rather developing a regulatory document which will lay out the expectations and guidance for training, duties and functions of an RSO, Applicant Authority (AA) obligations and accountability. This will begin with an evaluation of complex licensees to determine the successes and challenges for an RSO. Again, certification is not something that is being pursued at this time; however, it may be considered in the future and may not apply globally.
- Industry members stated that they do not want to see a certification program per say, but they would like better guidelines and expectations available for RSOs. They do not want to become engulfed in a large program for RSOs which may not necessarily be applicable to industry but would sure appreciate a set of guidelines to follow and use for training.
- P. Fundarek stated that the biggest challenge is to find a program that can be adapted to all industries regulated by DNSR/CNSC. It really comes back to Section 4 of the *Radiation Protection Regulations* for management control over work practices.
- A memorandum of understanding (MOU) has been recently signed between CNSC and the National Energy Board (NEB), approximately 8-12 months ago. This will allow for cross training of inspectors, CNSC will provide training to them. This MOU will allow us to build better collaboration and improve our communication between CNSC & NEB.
- DNSR is looking into using the e-Business approach for interfacing with licensees which will provide a similar portal as with SSTs. The first step is the inspectors

using tablets in the field to provide inspection reports to users. The issue with this process is that there are approximately 150 users for SSTS and there will be approximately 2100 users with the same portal. Eventually, one will be able to upload and post; the login will be similar to SSTS so that the inspection reports will be available. CNSC staff is working on roll out strategies internally so that the long term objective to have an electronic business interface with licensees can be achieved.

- A Microsoft dynamics work flow system is also being looked at which would provide external leverage with licensees. This is at least ten years in the future; there are many security considerations with this system.
- PCP-09 expectations are that anyone operating an exposure device in the field will have a valid card (with an expiry date). The plan is to proceed with an amendment to the regulations; however, it is a long process. In the meantime, inspectors will be looking at the validity of CEDO cards in the field, specifically for expiry dates. If a card is found, it will be recorded as a finding on the inspection; with the possibility of making a recommendation for de-certification.
- P. Fundarek provided an update on the status of REGDOC-2.5.5 which is in the final stages before publication. The public consultation period ended and all comments received have been dispositioned. The document is currently in the process of being finalized accordingly and will go through the approval process for publication. The disposition table of comments will be shared with those who provided comments. It is hoped that the document will go for approval in December 2017 with a proposed publication date of February 2018.

**Action item** – K. Mayer will set up a meeting (CNSC) to discuss the strategy and plan forward, for the implementation of document REGDOC-2.5.5.

- H. Rabski updated that some new staff has been hired in OID, there are several new trainees and the process is ongoing.

### **QSA Equipment updates**

There are no new equipment updates. The QSA Global 1075 SCARPro exposure device has been certified by the CNSC for use in Canada. There will be lots of them used in the nuclear power/industry due to the close proximity.

The QSA manual states that the misconnect test should be done quarterly by a trained individual. It should be done by someone who has been trained to carry out annual maintenance and inspection and testing.

The Inspection/maintenance course is geared for those who are responsible to do the inspection of equipment. There are guidelines from the inspection manual for 880s where certain areas are highlighted. It is a hands-on course including teardown of equipment.

During the course, emphasis is placed on the fact that maintenance should be performed in accordance to the manufacturer's specifications and guidelines.

Specific examples are the drive cables – looking for wear, breakage and rust. A NO-GO test gauge is provided to all. The QSA NO-GO gauges cannot be drilled through (hardened materials); this was not the case with the Nordion ones. They are calibrated with a micrometer (NIST Certified) like the SPEC 150s. The newest versions of the NO-GO gauges have been manufactured with a small hole to attach to a key chain.

There is also emphasis placed on the importance of having a quarantine program to remove defective or deficient equipment from service. Generic replacement components should not be used. Service bulletins are shared publicly. Although, some components historically do not wear out, visual inspection is still required.

There was discussion on the misconnect tests and the required frequencies; those stated in the manual are simply recommendations but in accordance with ANSI N42 and ISO399. If routine maintenance is being performed at a minimum annually, there should not be any misconnects. In the US, some states have recommended doing them quarterly. It all comes back to recommendations and the importance of performing routine maintenance, in which case, the frequency may increase due to environmental conditions.

B. Bizzarri asked if a misconnect test must be performed after each source change. C. Auzenne stated that this is not a requirement but if the exposure device is being moved from truck to truck, then all combinations should be tested. It is very hard to do and practically it is almost impossible. He also added that the frequency of misconnect tests is a grey area and in consultation with regulatory people, course instructors, device operators (radiographers) no one has the same frequency. QSA does not see many misconnect issues and when they have it is because other components have been used.

It is really important to use approved parts; in Canada there is a list of certified components. They have seen more issues in the US as there are other companies that are manufacturing components and these companies are not even manufacturers of radiography cameras.

The bottom line is to follow the manual and document the misconnect tests. It is recommended to add it to your checklists.

In terms of detecting DU during a leak test, QSA authorized distributors use a borescope to inspect s-tubes.

L. Simoneau recommended that IRs ensure their procedures for maintenance reflect exactly what is being done. CNSC inspectors will verify compliance against the expectations in the manuals. The input from IRWG members has been received by the Inspectors and they will meet to discuss and once they have finalized their document it will be circulated to the IRWG. It is not likely that the Inspectors group will meet on this till late 2017. L. Simoneau will provide an update at the February 2018 meeting.

**Action item** – L. Simoneau update on progress of maintenance document for inspections at February meeting.

### **Incident Awareness (website) Update**

- This topic was mentioned in the CNSC Regulatory Update by C. Moses and has been brought up countless times over the years by Industry. T. Levey brought it up again at this meeting for an update on the status of publishing events. The topic will be brought up in the presentation for the ROR at the Commission meeting tomorrow as well.
- C. Moses stated that CNSC staff understand and appreciate that Industry want to know what is trending with respect to IR. The CNSC is aware of the importance of sharing events and that other countries follow this practice. However, we have some information impediments in Canada (complexities) that are holding us back from publishing the information. We will continue to work to overcome them.

**Action item** – K. Mayer will explore the process with management (internal review) to see if at the very least, the source disconnect information can be shared.

### **Export of Category 2 Ir-192 sources (discrepancy b/w CNSC & USNRC)**

- T. Levey brought up the issue that there is a discrepancy (regulatory difference) between CNSC and US NRC on the notification of quantities that can be exported for Category 2 Iridium-192 sources.
- K. Mayer contacted T. Hayes from Non-Proliferation and Export Controls Division (NPECD) on this matter and he provided the following response for the group:

“The US NRC, as per their regulations aggregate. The CNSC does not. If a CNSC licensee wishes to export multiple Category 3 sources to the US, provided they have the authority under their Nuclear Substance and Radiation Devices licence to do so, can. The export from Canada will still be considered an export of Category 3 sources. However, under US regulations, because the shipment will aggregate to Category 2 quantities, the importing facility (such as QSA) is legally required to provide a notification to the US NRC 7 days prior to the import.

In order to assist in keeping the importing facility compliant, the CNSC has been advising Canadian exporters to notify QSA well in advance of the intended export date so that they can make this notification, noting that this is QSA’s (importing facility) responsibility and not the foreign exporting facility (Canadian licensee).

In simpler terms, if Acuren forgot to let QSA know, QSA is non-compliant and not Acuren.”

- There was some discussion and everyone agreed that this explanation is satisfactory and that there is nothing further on this matter.

## **New initiatives for IRWG**

### **Communication**

- Communication has been a primary initiative for the IRWG since its onset, and there has been a lot of progress in the relationship between CNSC staff and Industrial radiography licensees, this was noted in the attendance and feedback from the annual meetings as well as the overall morale has improved.
- The group agrees that the focus has to remain on trying to get through to the clients to communicate expectations and for education.

### **Client Expectations Discussion**

- The “Industrial Radiography Client Guide” poster has been created. The goal is to continuously distribute this to clients and enhance communications with clients.
- There is a need to get tools out to the client as the challenge is real and is still out there with many. The poster is seen as an accomplishment but the real question is what the next steps are? How do we keep this momentum going?
- Ideally, any tools that IR licensees have or that the CNSC has developed (such as booklet and client guide) must be included in the orientations that clients give to workers on site, not just IR workers.
- The presentation that was given at the annual meeting in May 2017 by Syncrude was excellent in how they have gained control over their job sites for safety with IR, but Syncrude is only one client. How do we get in front of others and speak to them?
- K. Mayer mentioned that she tried at length as well as other CNSC staff members to get someone to listen from OSSA and other organizations. No one called back.
- There was some good discussion on who could be contacted such as:
  - Safety Professionals of Canada
  - Clients and Fab Shops
  - Conference by NEB (leverage our MOU with NEB –for safety culture)
  - Alberta Construction Council
  - Canadian Centre for Occupational Health & Safety (H&S conference in Hamilton)
  - NDT conferences
  - Safety Industry conferences
  - ISN clients

- Our goal is to target the right conferences and get information to the right people and to get larger clients to attend our annual meeting.

**Action item** - Client subgroup members (Karen, Lucie, Patricia and Alan) look into H&S councils and conferences, magazines that we could potentially publish an article in or bulletin boards.

**Action item** – C. Moses send link for Alberta H&S conference.

### **PCP-09 Update and CEDO updates from J. Sigetich**

No updates have been sent to the scheme committee members by the CSA. There was question as to whether K. Adamovich is still at CSA. It was confirmed, she is however, she must be very busy as there has been no communication as of late.

#### **Update on PCP-09**

- The document was published in March 2015; the initial expectations were communicated in the document.
- There has been gradual implementation of the expectations and are now being considered in the renewals since January 2017.
- CSA formed a new scheme committee and met in October 2016. At this meeting, a rough draft of requirements for improvements to the next version was put together. It is now with CNSC (PCD) to develop a first draft of PCP-09 rev 2.
- Since the PCP-09 has been implemented with full requirements, there has been an administrative hurdle in dealing with all of the applications in PCD.
- As a result, the forms have been updated to minimize some of the back and forth that was taking place as it was really slowing down the process. This has simplified and expedited the renewal/certification process. A decision was made to place the priority on fixing this process.
- PCD is behind schedule on the draft of PCP-09 rev 2. The original plan was to have the draft complete by April 2017 for the Scheme Committee's review with a projection for the final version to be released in spring 2018. This is not the case; the draft document will hopefully be ready for comments/consultation by March 2018. There may be a scheme committee in spring 2018 to review the comments and make recommendations for the final update. It will then be sent to Industry members for comments. The main reason for the delay in the schedule is due to staffing changes and fixing the internal process. The document is now on the priority list.

- The overall summary of comments on PCP-09 is that in principle it is working well, however, it does lack clarity and there are many inconsistencies.
- Overall there are some growing pains as the process is implemented, tested and improved. It is a learning experience for everyone.
- There is a need for feedback on how well the candidates are prepared for the examinations based on the training they have received and of course the test metrics. Is the course providing the necessary information and foundations for success on the exams?
- Based on the amount of people who have taken the new training program, the results have improved significantly. It is clear to call a retrieval person if there is an incident. There is more awareness of security and the consequences. Training is being provided on the current regulations and expectations.
- The message to industry is that as of Nov 2017, the written examination registration will be available on-line. The option to choose a location and time as well as pay on-line will be in effect.
- Also as of Nov 1, 2017 the electronic written examinations will be given at test centres, they will be proctored. The list of test centers continues to grow.
- The number of test questions will drop from 148 to 90 questions as of Nov 1, 2017. Finally, it will be a 90 question exam. The passing grade has not changed; still at 75%. There will be a psychometric analysis of the test. The topic areas are aligned with the PCP-09 expectations.
- There will be no more paper for written examinations as of Nov 1, 2017! Accommodation will also be available as required, it will be on request.
- The system could not work with the CSA centres; they are now using another company (Yardstick) and are working with NRCan test centres.
- The translated questions (CNSC approved) are being used and there will be centres available in Québec also.
- All of the information is now live on the NRCan website.
- Any questions, please feel free to contact EDO hotline at CNSC.

## **Other Business**

### **Compliance update –**

- H. Rabski mentioned that the overall compliance trend in Industrial radiography has improved.
- There are still some minor issues with regards to transport (declaration and implementation of new changes from the regulations) but the numbers have decreased.
- Security has also come a long way in terms of compliance.
- The issue is with CEDOs and their certificates (no expiry date) and old QO cards still in the field.
- T. Levey stated that a database that tracks all certification dates would be ideal and a NEW list. Some new hires come in with old QO cards. It is also an issue that there is no notification provided for the renewal of certifications, this would be helpful. This is more of an issue for smaller companies as larger organizations tend to have an internal process to control this. An email reminder or a reminder letter would be a drastic improvement to the CEDO certification renewal process.

#### Frequency of IRWG meetings –

- The meetings have changed; many of the issues that existed at the onset have been resolved and continue to work well. There may not be a need to meet twice a year in the future. It was agreed, however, that there is real value in maintaining communication and continuing to work on joint ventures.
- The February 2018 will remain for meeting planning.

#### **Wrap Up, next meeting and adjournment**

The next IRWG is set for the week of February 5-7<sup>th</sup>, 2018, specific date and location yet to be determined.

The meeting was adjourned at 3:10 pm.

<b>Radiography Working Group - ACTION LIST</b>			
<b>RWG Item #</b>	<b>Description</b>	<b>Assigned Person(s)</b>	<b>Status or Due Date</b>
15WGM1.1	Bring a recorder to future meetings.	K. Mayer	Ongoing
15WGM1.2	Follow up with Regulatory Docs division for an update on the status/progress of REGDOC 2.5.5 and communicate the status to the working group until consultation/publication.	K. Mayer	February 2018
15WGM2.2	Ensure IRWG members are invited to Commission meeting for industrial report presentation	K. Mayer/ C. Moses	Ongoing
15WGM2.3	Check with Coms division at CNSC for options for videotaping, protocol for live feed, etc.	K. Mayer	February 2018
15WGM2.4	Industry (CIRSA) to check with community colleges for possible contacts for video opportunities.	A. Brady	February 2018
15WGM2.5	Reach out to licensees (Syncrude and Suncor) to see if interest in presentation at annual meeting	K. Mayer	February 2018
15WGM2.6	Provide further updates on QSA equipment	C. Auzenne	Ongoing
16WGM1.1	Invite potential IRWG member to attend next working group meeting	K. Mayer / L. Simoneau	February 2018
16WGM2.2	Provide an assessment of whether CIRSA can review large trainers programs for pre-qualification at next meeting.	A. Brady/T. Levey	February 2018
16WGM2.4	Client expectations subgroup to develop checklist/handout for client outreach for IRWG review	K. Mayer/L. Simoneau group	Closed
17WGM1.1	Request a specific date October 12, 2017 (a.m.) for the presentation of the ROR to accommodate working group members who will be required to travel for the meeting in order to attend the IRWG meeting. Proposal (ROR presentation Oct 12(a.m.) – IRWG meeting Oct 11, 2017 and IRWG post Commission de-brief October 12 (p.m.).	C. Moses	Closed
17WGM1.2	Send P. MacNeil's Safety Culture presentation for translation.	K. Mayer	Closed

17WGM1.3	Request proposal for cost review and options from Coms (M. Gerrish) to for review by C. Moses.	K. Mayer	Closed
17WGM1.4	Communicate with OSSA and IEC to solicit their interest.	K. Mayer	Closed
17WGM1.5	Send an email to C. Moses with your thoughts and views so that the information can be shared at the meeting. (Retention of RAs on website)	Industry IRWG members	Closed
17WGM1.6	Update ToRs and circulate with the minutes.	K. Mayer	Closed
17WGM1.7	C. Auzenne will check with QSA Reg Affairs division to see about adding (misconnect test) as a requirement in the manual and report back to the group.	C. Auzenne	Closed
17WGM1.8	Industry IRWG members to review the inspector guidance document and provide comments by April 30, 2017. <a href="mailto:daniel.alu@canada.ca">daniel.alu@canada.ca</a>	Industry IRWG members	Closed
17WGM1.9	Develop proposed meeting agenda based on notes; it will be sent out with the minutes and the invitation.	K. Mayer	Closed
17WGM1.10	Ask TLSSD to provide explanation and guidelines/requirements for log book reference.	K. Mayer for S. Faille	Closed
17WGM2.1	K. Mayer to set up a meeting (CNSC) to discuss the strategy and plan forward, for the implementation of document REGDOC-2.5.5.	K. Mayer	February 2018
17WGM2.2	L. Simoneau to provide an update on the progress of Inspectors maintenance document.	L. Simoneau	February 2018

<b>17WGM2.3</b>	K. Mayer will explore the process with management (internal review) to see if at the very least, the source disconnect information can be shared.	<b>K. Mayer</b>	<b>February 2018</b>
<b>17WGM2.4</b>	Client subgroup members (Karen, Lucie, Patricia and Alan) to look into H&S councils and conferences, magazines that we could potentially publish an article in or bulletin boards and provide updates on progress at meeting.	<b>K. Mayer and sub-group</b>	<b>February 2018</b>
<b>17WGM2.5</b>	<b>C. Moses send link for Alberta H&amp;S conference</b>	<b>C. Moses</b>	<b>February 2018 or before</b>