What is old is new again
Updating REGDOC 1.6.1 – Licence Application Guide
Nuclear Substances and Radiation Devices

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FUN FACTS

• First named RD/GD-371, consolidated 10 licence applications

• First version of REGDOC 1.6.1 was launched in October 2015
  • Editorial update and renaming
  • Second version published in May 2017

• Most downloaded document on the CNSC website
  • Over 200 downloads the day after posting
What led to revision?

• LEAN process review in April 2016
  – All CNSC groups involved in licensing worked together
  – Identified some simplifications and changes that could help smooth out licence assessment process
    • Identification of documents
    • Signatures and initials
    • Common problems
• Licensing team review of documentation
  • Identified further issues
  • Common questions from applicants
  • Common messages from CNSC staff

Licensee & applicant feedback included
REGDOC Change Process

• Theoretical
  1. Identify changes required
  2. Make those changes
  3. Publish

• Actual
  1. Identify changes required
  2. Make those changes
  3. “Oh wait, what about...”
  4. Repeat step 1
So what has changed in the LAG?

• New graphic warnings
  – Don’t submit dose information
  – Don’t submit security information
  – Don’t submit SINs

Do not submit information containing social insurance numbers.

A provincial health card or a social insurance card is not an acceptable form of government-issued identification.
So what has changed in the LAG?

• More information on Licence transfers

If the corporation number has changed from the one printed on the valid CNSC licence, then the applicant must request authorization to transfer the existing licence by completing a licence transfer form. The completed form may be submitted to the CNSC by mail or by email at cnsc.forms-formulaires.ccsn@canada.ca.

If the corporation number has changed from the one printed on the valid CNSC licence, then the applicant must request authorization to transfer the existing CNSC licence by completing a licence transfer form.
So what has changed in the LAG?

• Updated financial guarantees information

For new applications, this section does not apply.

For renewal of an existing CNSC licence, please include a copy of the receipt for the most recent payment of the financial guarantee contribution required for this licence, if any.

For public institutions, the financial guarantee requirement is covered through the conditions noted on the applicant authority form.
So what has changed in the LAG?

- **Information on locations for portable devices**

  When portable radiation devices are used at locations other than those of the licensee, the intended provinces of use should be provided. Only those provinces where it is reasonable to expect use of the radiation device should be included.

  If site or field locations are widely separated, it may be necessary to have a contact person responsible for radiation safety at each location.

- **Inventory information clarified**

  For a licence renewal, the nuclear substances and maximum activities requested in this application should match those currently listed on the existing CNSC licence.
So what has changed in the LAG?

• Updated & corrected tables
• Reference to other REGDOCs as appropriate
  REGDOC-2.9.1, *Environmental Principles, Assessments and Protection Measures*
• Hot links to other forms

Landlord/owner acknowledgement form

A completed copy of the request to appoint a radiation safety officer form should be attached to the licence application form.
So what has changed in the LAG?

- Other minor changes:
  - Updating of all e-mail addresses to “@canada.ca”
  - Guidance on acceptable forms of government-issued identification
  - Guidance in Part D.9 that prescribed information not be sent electronically
  - Many editorial changes & clarifications
What has changed in the forms?

• CNSC licence number on each page
  – Clearly identifies which licence is involved
  – Updated on each page of each form
  – Makes document handling easier

Enter existing CNSC licence number, if any:

If this is an application for a new CNSC licence, please leave this entry area blank.
What has changed in the forms?

• Greater functionality
  – Add rows to tables
  – Add use-types

<table>
<thead>
<tr>
<th>B.6 Unsealed nuclear substances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use type</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>+/- Nuclear Substance</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>-</td>
</tr>
<tr>
<td>-</td>
</tr>
<tr>
<td>+</td>
</tr>
</tbody>
</table>

Additional information regarding unsealed nuclear substances is appended as:

Add a use type | Remove
What has changed in the forms?

- Removed sections – use existing forms

![C.2 Radiation safety officer (RSO)]

- RSO has signing authority by default

The RSO is the designated authority to act for the applicant and has signing authority for all matters encompassed by the CNSC licence unless otherwise noted by the applicant in section C.5.

Complete and sign the Request to appoint a radiation safety officer

Form appended as:
What has changed in the forms?

- Removed some unnecessary approvals
  - Applicant Authority doesn’t have to sign each line
  - No need to initial each line on AA form

<table>
<thead>
<tr>
<th>C.5 Other representative(s) of applicant</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Use type</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>+/-</td>
</tr>
<tr>
<td>Name of representative of applicant</td>
</tr>
<tr>
<td>Title</td>
</tr>
<tr>
<td>Limitations of authority (if applicable)</td>
</tr>
<tr>
<td>Signature of representative</td>
</tr>
<tr>
<td>-</td>
</tr>
<tr>
<td>+</td>
</tr>
</tbody>
</table>

Add a use type  Remove

Append a list of any other persons who have authority to act for the applicant as per s.15 of the General Nuclear Safety and Control Regulations (GNSCR).
What has changed in the forms?

- Clarified requirement for procedures
  - Not a new requirement – no space on previous form

<table>
<thead>
<tr>
<th>E.11 Servicing (use-types 822, 823)</th>
</tr>
</thead>
<tbody>
<tr>
<td>E.11.1 Servicing procedures</td>
</tr>
<tr>
<td>Append a copy of all servicing procedures, specific to each radiation device identified in the application for this activity.</td>
</tr>
<tr>
<td>Appended as:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E.12 Manufacturing (use-types 817, 851)</th>
</tr>
</thead>
<tbody>
<tr>
<td>E.12.1 manufacturing procedures</td>
</tr>
<tr>
<td>Append a copy of all manufacturing or development procedures, specific to each sealed source or radiation device identified in the application for this activity.</td>
</tr>
<tr>
<td>Appended as:</td>
</tr>
</tbody>
</table>
REGDOC 1.6.1 Version 2

• Updated and refreshed
  – Part of evergreen process
• New functionality in forms
• More user-friendly

Comments from applicants & licensees are always welcome and will be considered for next revision
Thank You!

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