

**MINUTES OF RADIOGRAPHY WORKING GROUP MEETING ON TUESDAY,
MARCH 23, 2010**

In Attendance:

A. Regimbald
P. Fundarek
H. Rabski
P. Larkin
K. Mayer

Tom Levey
Rick Debruyne
François Rodier
Alan Brady
Chris Spencer
Joel Kish

Absent: E. Fortier
Guest: F. Newbury

Commencement of Meeting

The meeting started at 08:38 with Alan Brady welcoming those in attendance followed by opening remarks from André Regimbald. Henry Rabski chaired the meeting with Alan Brady as co-chair. He requested that the members review the draft CMD before tomorrow morning.

Review of action items to be closed off. New Action Items List attached.

Item One: CEDO Certification Action Plan

An introduction regarding the matter of certification of exposure device operators was provided. Francois Newbury was introduced as a subject matter expert from the CNSC. He is a member of the Personal Certification Division at the CNSC which oversees the CEDO program.

Personal Certificate Division

Questions to consider in the development of a plan: What changes to make? How long will it take? To be phased in? The intent is to assign task and a timeline.

CIRSA had sent out a survey but results not all back yet. Industry group does not have all industry feedback yet. About 30% response to-date. It was an on-line survey that takes 10-15 minutes to complete. CIRSA will then need to compile results.

Following list of topics was proposed to get the discussion going regarding the development of an action plan.

(1) G-229 Regulatory Guide – Certification of Exposure Device Operators

A suggestion was made that a revised version of G-229 might be incorporated in future amendments to the CNSC Regulations. CNSC representatives indicated that G-229 is not on the list of the regulatory policy directorate for updating. It was suggested that the G-229 guidance could be put into a licence condition. The current document has a lot of “should” “rather than” “shall”. The list of vocational training is out of date. A revised

G-229 does not need Commission approval, only approval by the Executive Vice President of the CNSC.

There was discussion to bringing CSA on board to develop a “standard”. The problem with G-229 now is that it’s not a “must”, it’s not an enforceable regulatory document or standard. CSA would have the resources to do this update of a document to replace G-229. Cost for CSA? CNSC already provides a grant to CSA. Action: CNSC to speak to internal contact re getting on the CSA list. It was suggested inviting a CSA person to a WG meeting:

If requirements are included as a licence condition CNSC Commission prefers that these list regulations. But until that time we can put this in licence condition. Commission expects a long term plan to be in Regs.

A suggestion to have two levels of training was made. Level I is an operator, Level II can do source retrieval.

Discussion goes to: what does the group want?

G-229 is missing human factors training. “No-go” training is missing. Retrieval training needs to be revised. The exam question is misleading because it leads them to believe they can do retrievals.

With respect to the two levels of certification, the following was proposed. Level I would cover CEDO and basic radiation safety. Level II certification would be issued by licensee and be specific to the company’s equipment and procedure.

A suggestion was made that the onus be put on manufacturers to produce appropriate training material, videos, training programs. The group was told that the QSA Model 880 manual is very good. The manufacturers should provide hands-on-training to RSO. A training CD/DVD would be of great benefit to RSOs in training their staff. Industry needs updates to the CEDO e.g. security, incidents that occur in the industry, proper surveying of device, human factors, safety culture, inspections of equipment, to recognise emergency situations, no-go checks, proper use of safety equipment, ALARA, workplace hazard assessment, information re orders and de-certification of operators. What are the responsibilities of the supervisor i.e. “I don’t touch anything until the supervisor is watching me”.

A discussion on training followed. Trainees only have 40 hours and have to concentrate on preparing for the retrieval essay question on the exam. If the exam is updated, will there be time to refocus the training? If CSA takes over certification, they can incorporate these changes to training. A comment was made that up to 10 hours of the training course is directed to basic math because basic math is not a pre-requisite.

A suggestion was made to colour code the certification:

CEDO Red - basic. Responsible for own safety. Must be supervised.

CEDO Orange – can supervise, can work on camera himself.

CEDO Green – can do everything, can do retrievals.

CNSC would issue the card. Licensee would apply to CNSC.

Role of the licensee: Provide workers with an equipment card.

Where do we go from here? Is there a need to add the additional items that are missing from G-229? An industry representative suggested graduated supervision of trainees i.e. they could be supervised from a distance but with no authorisation to connect or disconnect a device.

Decision: Unanimous by the group that G-229 needs to be revised.

2) **Revision of CEDO Exam:**

Written test – source recovery is a focus of the training course geared to passing exam. It is no longer applicable. Six versions of exam exist and the last change was made 2000. Need knowledgeable people to do review.

From an industry perspective, the candidates fail the retrieval essay question. Need to clean up the exam to include references to the revised regulations and get rid of retrieval question.

CNSC maintains co-responsibility for revision of questions presented in the exams. DNSR could initiate a revision and coordinated through the Certification Division which is the interface between CNSC and NR Can.

Action: F. Newbury will look into revision of all the exam questions.

A suggestion was made that the exam should be reviewed for possible update every 3 years as a minimum. Certification Division will get back about failure rates.

Exam administrators has been delegated by the CNSC however the Commission must still retain control of certification because certification is under the NSC Act.

We can leave the exam administration with NRCAN or we can look at using CSA to revise the study guide and administration of the exam?

Ratio 60:40 for multiple choice/essay may change depending on new content. Is the person responsible for grading the exams experienced?

What are the expectations for the essay question currently e.g. identify steps but in the wrong order? What about spelling/grammar – is this evaluated?

What does the US NRC do with regard to exam – is there an essay question? The exam must also evaluate how the candidate thinks under pressure.

The Study Guide dates to 1989. It is still recognised as a very good and useful manual. It should be revised.

Question: Who should do the update? Could this be contracted out?

Perhaps CIRSA could write a new industrial radiography guide?

Rewrite of the study guide could be incorporated with new exam by CSA or other organization as a package?

If CNSC controls the study guide, we can control the curriculum.

An option is for the CNSC to contract out the re-write of the study guide. Document would be owned by CNSC.

There are about 100 applicants per year. This is to be an open item at next meeting.

3) **Fee Structure**

The committee agreed that there is a need to look at both renewal and recertification. Industry will push back against recertification with a practical exam. Some kind of refresher training would be acceptable. Perhaps if out of the industry for a certain number of years, then renewal may not occur. Suggestion is that candidate for renewal would need to produce proof of hours of work in order to qualify for renewal.

Need to determine that the individual is still competent. Currently there are approximately 3000 in the database. Perhaps half are no longer working.

Recommendation: A 3-year renewal for CEDO since CGSB already has a 3-year renewal for other NDT modalities.

Financial? Cost for renewal? CEDO renewal would be something nominal e.g. \$100.

CNSC staff agreed to find the rationale for the present \$1000.00 fee. What are current costs? Decertification is currently not cost recovered. It was suggested that there will be push-back from those that paid \$1000.00 for a lifetime ticket. There is a need for an administration fee for the renewal.

Item Two: Agenda for Annual Meeting in May 2010

The meeting will be tied in with CRPA meeting. CRPA meeting is on the 26th, CNSC meeting on the 27th and the CIRSA meeting on the 28th.

Proposal is to have a full day session with a training component in the afternoon. The following agenda was suggested.

8:30: Andre to give opening remarks. Give history since Spring of 2008.

9:00-9:30: Give presentation on work we are doing – give an update on CEDO and what we are doing.

9:30-10:00 Talk on communications.

10:30-11:00: Compliance performance from CNSC perspective to be presented by CNSC – Peter Larkin.

11:00-11:30: Karen/Tom: Event reporting – what is required for event reporting?
Introduce the new event report template.

1:00-9:00 p.m.

1:00-1:30: QSA Global will introduce a new device.

3:30-4:00: TDG training Session

Other logistic suggestions.

K. Mayer to moderate and P. Larkin to be responsible for arrangements. The Western Canada meeting would be held in Edmonton with some local hotels identified. For Eastern Canada, Ottawa was proposed as the location. That meeting would be planned to coincide with the June Commission Hearing.

Minutes prepared by: Peter Larkin

EDocs: 3529119

March 24, 2010