

## University of Toronto

OFFICE OF THE VICE-PRESIDENT HUMAN RESOURCES & EQUITY

Re:	CANADIAN NUCLEAR SAFETY COMMISSION - SUMMARY OF AUDIT
Date:	February 10, 2006
From:	Angela Hildyard Vice-President, Human Resources & Equity
To:	Business Board – Agenda Planning

An audit of the Radiation Protection (RP) Program was undertaken at the University of Toronto by staff of the Canadian Nuclear Safety Commission from November 29- December 2, 2006.

The scope of the evaluation included the following aspects of the Radiation Protection Program:

Radiation Protection	Emergencies and Unplanned Events
Environmental Protection	Training and Qualification
Operational Procedures	Organization and Management
Security	International Obligations and Safeguards.

The evaluation included interviews with 45 individuals (Vice-President and Assistant Vice-President, Chair of the Radiation Protection Authority, RPS Manager and staff, Permit Holders, lab staff and Police) and review of documentation (numerous manuals and records, minutes of meetings, designation of Nuclear Energy Workers, and instrument calibrations). The audit team also undertook field observations in the Medical Sciences, Fitzgerald, Tanz, Pharmacy, Wallberg, UTM and Ramsay Wright buildings.

The evaluation team issued one Directive – with multiple components - and one Action Notice.

The Directive and Action Notice primarily relate to the design and implementation of the University's radiation protection program, particularly with respect to issues of compliance and security. Specifically, CNSC has suggested that

- the Radiation Protections Services do not have sufficient resources to do their job adequately
- the current organizational structure does not provide the RPS with the authority required to manage the radiation protection program effectively
- > more frequent disciplinary actions are required through the internal enforcement policy
- the internal authorizations of Permits, quantities of materials received and disposed, classification of locations are too permissive and the permit renewal period is too long

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- the radiation protection training course must include a hands-on practical component, refresher training must be documented for all Permit Holders and users
- > Permit Holders must provide practical hands-on training in the labs that is documented
- > the security of nuclear substances and radiation devices must be improved.

With the active involvement of the Chair of the University's Radiation Protection Authority and the Director of Environmental Health and Safety, we are currently reviewing our policies and procedures and developing our response to the CNSC. The University's response to the Audit will be discussed by the Radiation Protection Authority prior to its submission. We also plan to meet with the Professor Challis' Research Advisory Board since some of the issues raised by CNSC have significant implications for our researchers if we follow the procedures they have proposed.