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**Sent:** Friday, November 17, 2017 3:19 PM  
**To:** Consultation (CNSC/CCSN)  
**Subject:** REGDOC-2.7.3: comments

Good Afternoon,

I am writing to you on behalf of The Ottawa hospital to provide comments on the draft REGDOC-2.7.3, *Radiation Protection Guidelines for the Safe Handling of Decedents*.

The Ottawa Hospital appreciates the CNSC undertaking the task of providing guidance to life care, death care and radiation safety staff in the event a radioactive patient passes away before the radioactive materials have fully decayed. The scenario involving a radioactive decedent is one filled with confusion, fear and strong beliefs and currently there is a void with respect to expectations for hospital RSOs.

Our comments are as follows:

- 1) In general the document does an excellent job at providing guidance to the death care worker by providing detailed explanations of the various therapies, isotopes and general timelines. However, throughout the document they are often directed to contact the RSO of the institution who treated the patient without providing the RSO any clarifications on how to actually handle the situation. An example would be to provide more guidance on the storage and disposal requirements for handling bones with lesions have been removed as part of an autopsy.
- 2) Table 2 is an excellent resource for explaining that a patient who passes away outside of the times listed poses no risk to staff who will handle to the decedent. However, for an RSO it would likely be more beneficial to have specific release activities that could be estimated prior to the release the decedent, similar to what has been listed in the ICRP safety report # 63.

**TABLE 14. SUGGESTED CORPSE ACTIVITY LIMITS**

*(adapted from information reviewed in ICRP 94 [2] from Australia [79], Sweden [65], the UK [76–78, 80, 81] and the USA [82])*

Radionuclide	Activity limit (MBq)		
	Autopsy/embalming	Burial	Cremation
Phosphorus-32	100 (IPEM) <sup>a</sup> 300 (Aus) <sup>b</sup> 400 (S) <sup>c</sup>	2000 (IPEM)	30 (IPEM) 400 (Aus) 400 (S)
Strontium-89	50 (IPEM)	2000 (IPEM)	20 (IPEM)
Yttrium-90	200 (IPEM) 150 (colloidal, Aus) 450 (sealed, Aus) 200 (S)	2000 (IPEM)	70 (IPEM) 1000 (Aus) 1200 (S)
Iodine-131	10 (IPEM) 450 (Aus) 600 (S)	400 (IPEM) 400 (UK)	400 (IPEM) 1000 (Aus) 1200 (S)
Gold-198	150 (Aus) colloidal 450 (Aus) sealed		1000 (Aus)
All			74 (US)

3) While it is useful to provide the relevant provincial legislation, little to no guidance is provided on how to proceed with handling a decedent under that legislation. It would be more useful to clearly state the provinces in which cremation is clearly not allowed and whether that regulation applies to both sealed and unsealed sources. For example, when reading the Ontario funeral home legislation one is lead to believe that only sealed sources are prohibited from cremation. Yet, from our experience liquid sources were also prohibited.

Once again, we are very appreciative of the CNSC taking on the task of providing guidance for what is a complicated issue involving a wide variety of scenarios.

Sincerely,

**Michèle Légaré, M. Sc.**

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