

Record of Proceedings, Including Reasons for Decision

In the Matter of

Applicant SRB Technologies (Canada) Inc.

Subject Application to Amend the Nuclear Substance
Processing Facility Possession Licence

Hearing
Date April 12, 2007

RECORD OF PROCEEDINGS

Applicant: SRB Technologies (Canada) Inc.

Address/Location: 320-140 Boundary Road, Pembroke, Ontario K8A 6W5

Purpose: Application to amend the Nuclear Substance Processing Facility Possession Licence

Application received: February 23, 2007

Date(s) of hearing: April 12, 2007

Location: Canadian Nuclear Safety Commission (CNSC) Public Hearing Room, 280 Slater St., 14th. Floor, Ottawa, Ontario

Members present: L.J. Keen, Chair
C.R. Barnes A. Graham
J.A. Dosman M.J.M. McDill

Secretary: M. Leblanc
Recording Secretary: P. Bourassa
General Counsel: S. Maislin-Dickson

Applicant Represented By		Document Number
• S. Levesque, President		CMD 07-H10.1 CMD 07-H10.1A
CNSC staff		Document Number
• B. Howden • H. Rabski • A. Erdman	• S. Mihok • P. Flavelle	CMD 07-H10
Intervenors		Document Number
See appendix A		

Licence: Amended
Date of Decision: April 12, 2007

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Introduction

1. SRB Technologies (Canada) Inc. (SRBT) has applied to the Canadian Nuclear Safety Commission (CNSC¹) for an amendment to its Class IB Nuclear Substance Processing Facility Possession Licence NSPFPL-13.00/2008. SRBT is seeking authorization to receive tritium-filled light sources and to limit the inventory of tritium at its facility located in Pembroke, Ontario.
2. SRBT is currently authorized to carry on certain limited activities related to the possession of tritium that includes the general possession, transfer, management, storage and disposal of nuclear substances.

Issue

3. In considering the application, the Commission was required to decide, pursuant to subsection 24(4) of the *Nuclear Safety and Control Act*²:
 - a) if SRBT is qualified to carry on the activity that the amended licence would authorize; and
 - b) if, in carrying on that activity, SRBT would make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.

Public Hearing

4. The Commission, in making its decision, considered information presented for a public hearing held on April 12, 2007 in Ottawa, Ontario. The public hearing was conducted in accordance with Rule 3 of the *Canadian Nuclear Safety Commission Rules of Procedure*³ (*Rules of Procedure*). In establishing the process, a standing panel on procedural matters shortened the time limits for giving notice of the public hearing and for the filing of submissions.
5. In accordance with Rule 19 of the *Rules of Procedure*, the standing panel also decided to allow intervenors to participate at the hearing by way of written submissions.

¹ In this *Record of Proceedings*, the *Canadian Nuclear Safety Commission* is referred to as the “CNSC” when referring to the organization and its staff in general, and as the “Commission” when referring to the tribunal component.

² S.C. 1997, c. 9.

³ S.O.R./2000-211.

6. During the public hearing, the Commission received written submissions and heard oral presentations from CNSC staff (CMD 07-H10) and SRBT (CMD 07-H10.1 and CMD 07-H10.1A). The Commission also considered written submissions from 79 intervenors (see Appendix A for a detailed list of interventions).

Decision

7. Based on its consideration of the matter, as described in more detail in the following sections of this Record of Proceedings, the Commission concludes that SRBT is qualified to carry on the activity that the amended licence will authorize. The Commission is also satisfied that SRBT, in carrying on that activity, will make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed. Therefore,

the Commission, pursuant to section 24 of the *Nuclear Safety and Control Act*, amends the Class IB Nuclear Substance Processing Facility Possession Licence NSPFPL-13.00/2008 issued to SRB Technologies (Canada) Inc. for its facility located in Pembroke, Ontario. The amended licence NSPFPL-13.01/2008 remains valid until July 31, 2008.

8. The Commission includes in the licence the conditions recommended by CNSC staff, as set out in the draft licence attached to CMD 07-H10 and listed below.

Part IV) LICENSED ACTIVITIES, paragraph (b) is deleted and replaced with the following:

(b) possess, transfer, manage and store the nuclear substances that are associated with the facility described in (a);

Part V) condition 2.1 is deleted and replaced with the following:

2.1 The licensee shall not import, obtain, acquire or receive additional nuclear substances, except in the following cases:

(a) The licensee can import, obtain, acquire and receive tritium in relation to article 28(2) of the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management.

(b) The licensee can import, obtain, acquire and receive tritium filled light sources for distribution and assembly into radiation devices for distribution.

A new paragraph has been added in Part IV) LICENSED ACTIVITIES:

(c) possess a maximum of 6,000 TBq of tritium in any form.

Hearing Process

9. Before considering the licence application, the Commission considered the concerns expressed by intervenors regarding the Commission's public hearing process.
10. The Ottawa Riverkeeper, in its intervention, expressed concerns about the public's inability to assess adequately SRBT's licence amendment application, given the lack of documentation and inadequate timeframes for review.
11. The Concerned Citizens of Renfrew County (CCRC), in its intervention, submitted that the Commission should deny or adjourn the hearing on SRBT's licence amendment application to a later date on procedural grounds related to the time periods between the Notice of Hearing and the hearing itself, and the date of hearing and date of filing by CNSC staff. CCRC also objected on other grounds, including the manner in which the intervenors were allowed to participate.
12. The Commission considered these interventions and SRBT's and CNSC staff's views on the request to adjourn the hearing. The Commission ruled that it would not adjourn the hearing prior to going through the evidence. The Commission was satisfied that the manner in which the proceeding would be conducted was fair, in accordance with Rule 3 of the *Rules of Procedure*. The intervenors had sufficient time to review SRBT's application and CNSC staff's recommendations, considering the specificity of the matter to be considered, that is to authorize the receipt of tritium filled light sources for assembly and direct onward sale, and to reduce the inventory of tritium from the current 11,000 TBq to 6000 TBq. In light of the recent hearings⁴ respecting this licensee, and taking into account the information that is on the record for those proceedings, the Commission is of the view that the intervenors had been provided adequate opportunities to submit information to the Commission for its consideration. The Commission is also of the view that the procedural considerations for this hearing have been determined in such a way as to ensure that the Commission will receive the information it needs to proceed with a decision.
13. The Commission considered CCRC's comments regarding intervenor participation and its request to make an oral presentation. The Commission ruled that it will not permit CCRC, or any other intervenor, to present orally. The Commission is satisfied that intervenors were provided adequate opportunity to participate. The Commission notes that it has the discretionary power to determine whether an organization will be granted intervenor status in a proceeding, and the rights that will accompany such status if it is granted. Rule 19 of the *Rules of Procedure* states that the Commission may permit persons to participate as intervenors at the hearing in the manner and to the extent that the Commission considers will enable it to determine the matter before it in a fair, informal and expeditious manner.

⁴ The following two hearings were held in 2006: a hearing on August 28, 2006 to review a designated officer order issued to SRBT and a hearing held on October 25 and November 27, 2006 to consider a licence renewal application.

14. The Commission considered all the submissions in the context of the deliberations and decided, after consideration of the evidence, that additional information would not be sought from the participants and CNSC staff.

Issues and Commission Findings

15. In making its licensing decision under section 24 of the NSCA, the Commission considered a number of issues relating to SRBT's qualifications to carry out the proposed activities, and the adequacy of the proposed measures for protecting the environment, the health and safety of persons, national security and international obligations to which Canada has agreed. The Commission's findings on these issues are summarized below.

Radiation Protection

16. As part of its evaluation of the adequacy of the provisions for protecting the health and safety of persons, the Commission considered whether the proposed activities would pose any risk from radiation to the workers or the public.
17. SRBT stated that workers will continue to be protected through the continued implementation of the existing Radiation Safety Program and associated radiation safety procedures. Doses to workers will be assessed through the existing bioassay program while surface contamination in the facility will continue to be assessed by the existing swipe monitoring program.
18. CNSC staff concurred with SRBT that the proposed activities would be supported by SRBT's existing Radiation Protection Program and associated procedures, noting that the program and its implementation met requirements. CNSC staff noted that radiation exposures and doses to workers are being adequately controlled and that the risk of any increased radiation exposure to a worker during the proposed activities is minimal.
19. With respect to the protection of the public from radiation exposure, SRBT submitted that the proposed activities to handle tritium filled lights represent a minor change to SRBT's existing licence, resulting in little to no impact on the protection of the environment and the health and safety of the public.
20. CNSC staff noted that the atmospheric release limits listed in the current licence are less than the calculated derived release limits, and therefore SRBT's compliance with the licence limits ensure that the dose to the public is less than the regulatory dose limit of 1 millisievert per year (mSv/a). Refer to the section below of this *Record of Proceedings* on Environmental Protection for a further discussion of the Commission's related findings on environmental protection.

21. Certain intervenors expressed their concern with the health effects of tritium and questioned the available mortality reports relevant to this community. In response to these concerns, the Commission notes that this was the subject of the 2006 licence renewal hearing⁵ and that the Commission continues to be of the opinion that the health and safety of the public has not been negatively affected by the tritium releases resulting from the operation of the SRBT facility. The Commission further notes that SRBT is not authorized to process tritium under the current licence nor is processing of tritium the object of this licence amendment application.
22. The Commission is of the view that the proposed activities do not pose an additional risk to the workers or the public than those activities authorized under the current licence. As expressed during the 2006 licence renewal hearing, the Commission is of the view that, under the conditions of a possession licence, SRBT has made and will make adequate provisions for the protection of persons from radiation at its facility. The Commission thus took into consideration the potential for additional risk to persons as a result of incidents such as the breakage of the sealed tubes during shipping, transportation or general handling.
23. Similarly, several intervenors expressed concern with the impact that such incidents would have on the health and safety of the public and the environment.
24. In this regard, SRBT noted that elements of the Radiation Safety Program and procedures are in place should a breakage occur, and its staff is fully trained and qualified to take the necessary precautions to contain any release of tritium and minimize the exposure to staff and contamination of any part of the facility. Further discussion on the potential impact of tubes breaking is found in the section below on Operations and Qualifications.
25. Based on the information received, the Commission is of the opinion that the proposed activities would have a minimal impact on the current low risk associated with the activities authorized under the current licence. The Commission concludes that SRBT will make adequate provision for the protection of persons from radiation while carrying out the activities that the amended licence will authorize.

Environmental Protection

26. SRBT stated that under the proposed amended licence, it will continue to conduct emissions monitoring, stack verification and maintain an Environmental Monitoring Program as required by its current licence.

⁵ Refer to the *Record of Proceedings* on the matter of the *Application for the Renewal of Class IB Operating Licence for the Gaseous Tritium Light Source Facility in Pembroke, Ontario*, date of hearing October 23 and November 27, 2006.

27. CNSC staff stated that SRBT is continuing to monitor stack emissions and using a third party for emission monitoring and stack verification. CNSC staff noted that the atmospheric release limits listed in the current licence are intended to prevent unreasonable risk from contamination by atmospheric deposition of tritium to groundwater. CNSC staff further noted that as tritium is not being processed under the current licence, the tritium released to the environment has been reduced considerably. In support of this information, CNSC staff noted that weekly average releases, due to residual degassing, waste handling and occasional light source breakage, represent a small percentage of the annual limits established in the licence. The releases also represent 2.3% of the average weekly tritium oxide (HTO) releases and 0.9% of the average weekly tritium gas (HT) releases of SRBT from January to mid-August 2006, when processing was occurring, and prior to many changes at the facility.
28. With respect to the environmental impact of releases from broken tubes and considering that SRBT handles containers with up to 100 filled tubes during the assembly process, CNSC staff stated that the release of the contents of one container would represent an atmospheric release of 4300 GBq or a release of 0.83% of the annual atmospheric limit. In addition, CNSC staff noted that SRBT's chart recorder used for real time monitoring is capable of measuring each time a tritium filled tube breaks and that SRBT staff documents each incident on the chart recorder paper. Further discussion on the potential impact of tubes breaking is found in the section below on Operations and Qualifications.
29. CNSC staff concluded that the potential for additional releases to the environment as a result of the activities under the proposed amended licence would be minimal, and that, even if hypothetical releases were to occur, the consequences would not pose an unreasonable risk to the environment.
30. SRBT provided an update on groundwater conditions, noting that since November 27, 2006, it has continued to systematically and quantitatively analyze the tritium sources and their potential contribution to groundwater contamination. SRBT noted that a December 28, 2006 report on the monitoring results show that concentrations of tritium in standing water everywhere on site have significantly been reduced.
31. The Commission sought further information with respect to the levels of tritium concentrations in wells, as submitted by CNCS staff, considering that the levels appear to remain high over a period where changes in operations would have expected to lower the concentrations. SRBT and CNSC staff explained that the impact of changes in operations, including the cessation of processing tritium, might take years to be detected. SRBT added that although most wells affected by surface infiltration will show decrease in concentration in a shorter time period, other wells would not reflect changes as rapidly. CNSC staff concurred with SRBT, noting that variation in wells will depend on water flux, type and state of the wells. CNSC staff added that the tritium concentrations were provided to the Commission to demonstrate that the releases resulting from tube breakages would have a very low impact, if even

measurable and that any additional loadings to the environment would not be unreasonable.

32. Certain intervenors expressed the view that further activities should not be allowed at the facility until there is a better understanding of the groundwater contamination. The Commission considered this matter and notes that the sources of groundwater contamination will be the subject of an upcoming Commission meeting.
33. Based on the information received, the Commission is of the opinion that the proposed activities would not have an unreasonable impact on the environment. The Commission is thus satisfied that SRBT will continue to make adequate provision for the protection of the environment during the proposed activities.

Operations and Qualifications

34. As further indication of how SRBT is likely to perform during the proposed activities, the Commission examined certain aspects of SRBT's proposal, including packaging and transportation of the tritium-filled tubes and inventory, as well as SRBT's qualifications to carry on the activities.
35. SRBT submitted that the activities that would be authorized by the proposed amendment would not require that any new methods or procedures be implemented, noting that the required protection measures are already in place and in use as per the requirements of the current licence. CNSC staff concurred with SRBT in this regard.
36. SRBT provided details on the procedures and protection measures in place for receiving and handling of the tritium-filled tubes and assembly of the devices. SRBT noted that any evidence of tritium leakage would be reported and that stationary and portable tritium-in-air (TIA) monitors are in place to detect elevated airborne tritium concentrations and determine the source.
37. CNSC staff noted that it found no items of non-compliance during its recent inspection and that SRBT had submitted its annual compliance report and a groundwater analysis report, as required by the current licence.
38. A few intervenors expressed concern that the proposed activity, that would allow SRBT to acquire tritium-filled tubes from other facilities, would simply shift the health and safety issues to another location.
39. In this regard, the Commission sought information on how the proposed amendment would affect other facilities. CNSC staff responded that other facilities involved in filling the tubes with tritium meet regulatory requirements. The Commission is thus satisfied that the regulatory oversight of the CNSC licensed facilities that will be directly and indirectly involved as a result of the proposed activities is adequate to ensure the protection of health and safety.

40. The Commission sought further information on the current and proposed inventory of radioactive material. CNSC staff responded that based on its February 21, 2007 inspection, the inventory was close to 6,000 TBq which includes all substances such as waste, tubes already filled with tritium and tritium on beds from reclaimed tritium. CNSC staff confirmed that the proposed reduction in inventory limit to 6,000 TBq would not pose an additional risk to the environment as the existing safety analysis, which is based on an inventory of 11,000 TBq, remains valid.
41. In response to the Commission's enquiry whether the material is stored safely, CNSC staff noted that although the material is sealed, there is degassing that occurs but added that the risk associated with this is not unreasonable. SRBT noted that a number of glass tubes will remain on tritium getter beds and will not be handled under the current or the proposed amended licence.
42. As noted in the sections on Radiation Protection and Environmental Protection of this *Record of Proceeding*, the Commission sought further information regarding the breakage of tritium-filled tubes. Based on 16 years of operational experience working with tritium filled light sources, SRBT noted that breakage is an infrequent occurrence. As evidence, SRBT stated that its records show that during the last 20 weeks of operation, eight tubes were broken out of more than 100,000 tubes handled.
43. CNSC staff concurred with SRBT that breakage of filled glass tubes is not a frequent occurrence. Given that the releases from tubes breaking are likely to be minimal, CNSC staff stated its view that the proposed releases from handling filled tubes would be reasonable in terms of protection of the public and the environment.
44. The Commission further enquired on how a tube that may be releasing tritium or be prone to breakage would be handled. SRBT explained that packages are received and verified by certified personnel to ensure each package is acceptable and that it would report any leaks, evacuate the area and contain the tube before transferring it to the waste storage.
45. With respect to packaging and transportation, SRBT explained the procedures and protection measures in place and stated that the packaging and shipping of the devices would meet the International Atomic Energy Agency (IAEA) Safety Standards Series and *International Air Transport Association Dangerous Goods Regulations* and applicable regulations for the country of origin.
46. CNSC staff noted that it expects increased activities if the proposed amendment is approved. However, CNSC staff noted that past performance, as confirmed by inspections to measure compliance with the *Packaging and Transport of Nuclear Substances Regulations*⁶, demonstrates that SRBT has been compliant with applicable regulations for packaging and transport. Further, there is no evidence to indicate that this compliance will not continue under the amended licence. In response to the Commission's enquiry, CNSC staff also noted that SRBT does not require a CNSC transport licence under the current or proposed amended licence.

⁶ S.O.R./2000-208.

47. Several intervenors, including M. and J. Yuill, CCRC, Citizens for Renewable Energy and L. Jones, expressed concern with the risk associated with the assembly and shipping and transportation of the devices. These intervenors were of the view that SRBT's poor performance in the past does not provide assurance that adequate provisions to protect the health and safety of persons and the environment would be made under the amended licence.
48. The Commission took into consideration the intervenors' concerns with respect to the past performance of the licensee. The Commission notes that the proposed amendment would not authorize the processing of tritium which is the activity that has been at the source of the Commission's concerns regarding the qualifications of SRBT and the provisions made by SRBT to protect the environment in the past.
49. SRBT provided information with respect to the roles and responsibilities, the training and the qualifications of its staff that would be involved in the proposed activities. In this regard, SRBT noted that its staff is fully trained and qualified to take the necessary precautions to contain any release of tritium and minimize the exposure to staff and contamination of any part of the facility.
50. The Commission enquired whether the CNSC staff has maintained the increased regulatory oversight for this facility that had to be provided in the past. CNSC staff responded that it had adjusted its oversight as a result of the activities authorized under the possession licence issued to SRBT. CNSC staff noted that the regulatory oversight is sufficient for this type of facility and is comparable to other similar facilities.
51. The Commission sought further information with respect to CNSC staff's approach to compliance and monitoring if the proposed activities were to be authorized. CNSC staff informed the Commission that it would continue with its compliance activities that include routine inspections and unannounced inspections as well as audits. CNSC staff also noted that reporting requirements would continue to be in effect, as per the relevant licence conditions, and that in addition, significant events would be reported to the Commission at a public proceeding. Considering the heightened awareness and concern for this facility, CNSC staff added that this would include events that are not necessarily risk significant but that would be of interest to the community and the Commission.
52. Based on the recommendations by CNSC staff and the procedures and training in place at SRBT, the Commission is of the opinion that the risks associated with the proposed activities are not unreasonable and that SRBT is qualified to carry on those activities.

Fire Protection

53. CNSC staff reviewed the safety programs at the facility with respect to the amendment requests. CNSC staff noted that the amendments do not require any changes at the facility with regard to fire protection.

Security

54. With regard to the maintenance of security at the project site during the proposed activities, CNSC staff reported that SRBT has in place, and is successfully implementing, an acceptable Security Program.
55. Based on the information received, the Commission concludes that SRBT will continue to make adequate provision for maintaining security at its facility.

International Obligations

56. Concerning the matter of whether SRBT will make adequate provision to ensure maintenance of Canada's international obligations for non-proliferation, CNSC staff reported that SRBT meets, and is expected to continue to meet, all applicable requirements.
57. CNSC staff noted that under the current licence, it has been considering only import licence applications from SRBT in specific circumstances where SRBT requests to import nuclear substances in relation to the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. CNSC staff further noted that if the Commission amends the licence as requested, CNSC staff would also consider applications for an import licence pursuant to the *Nuclear Non-proliferation Import and Export Control Regulations* for the import of tritium filled light sources for distribution and for assembly into radiation devices for distribution.
58. SRBT noted that should this amendment be approved, tritium filled light sources would be received from a combination of three licensed facilities requiring the application of two import permits. SRBT confirmed that it would not seek to import tritium-filled light sources for the purpose of disposal.
59. The Commission is of the opinion that SRBT has made, and will continue to make in respect of the proposed activities under the licence, adequate provision for maintaining Canada's applicable international obligations.

Decommissioning and Financial Guarantee

60. Certain intervenors, including the Ottawa Riverkeeper, B. Biederman, C. Caccia, V. Young and L. TerMarsch raised concern that SRBT does not have a decommissioning plan or an acceptable financial guarantee in place.
61. The Commission notes that the current licence includes a condition for a preliminary decommissioning plan and financial guarantee. The Commission further notes that SRBT's application for a licence amendment to authorize proposed activities does not impact this licence condition and that SRBT is still required to fulfil this condition.

Cost Recovery

62. Based on the information provided by CNSC staff, the Commission is satisfied that SRBT is in good standing with respect to the payment of fees.

Application of the *Canadian Environmental Assessment Act*

63. Before making a licensing decision, the Commission must be satisfied that all applicable requirements of the *Canadian Environmental Assessment Act*⁷ (CEAA) have been fulfilled.
64. In this case, CNSC staff stated that no environmental assessment is required under the CEAA because the proposed amendment would enable the continued operation of the facility that was part of the scope of environmental screening conducted in 2000. CNSC staff noted that the *Exclusion List Regulations*⁸ under the CEAA apply in such instances.
65. The Commission agrees with CNSC staff and finds that no environmental assessment pursuant to the CEAA is required before the Commission may make a decision on the licence amendment application.

Conclusion

66. The Commission has considered the information and submissions of SRBT, CNSC staff and intervenors as presented in the material available for reference on the record.
67. The Commission concludes that SRBT is qualified to carry on the activities that the amended licence will authorize. Furthermore, the Commission concludes that in carrying on those activities, SRBT will make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.
68. The Commission therefore amends, pursuant to section 24 of the *Nuclear Safety and Control Act*, the Class IB Nuclear Substance Processing Facility Possession Licence NSPFPL-13.00/2008 issued to SRB Technologies (Canada) Inc. for its facility located in Pembroke, Ontario.
69. The Commission includes in the licence the conditions recommended by CNSC staff, as set out in the draft licence attached to CMD 07-H10.

⁷ S.C. 1992, c. 37.

⁸ S.O.R./94-639.

70. The Commission notes that it will consider the annual compliance report and the report on tritium sources and their potential contribution to groundwater contamination, as submitted by SRBT and required by the licence, at the June 21, 2007 public meeting of the Commission.

Linda J. Keen,
President
Canadian Nuclear Safety Commission

Date of decision: April 12, 2007

Date of release of Reasons for Decision: May 11, 2007

Appendix A – Intervenors

Intervenors	Document Number
Mary and Jim Yuill	CMD 07-H10.2
Ottawa Riverkeeper	CMD 07-H10.3
Andre Pellerin	CMD 07-H10.4
Tara Pellerin	CMD 07-H10.5
Josef Allen	CMD 07-H10.6
Gwen Hoffman	CMD 07-H10.7
Mark Hoffman	CMD 07-H10.8
Kool Temp/Valley Refrigeration	CMD 07-H10.9
Kevin Voldock	CMD 07-H10.10
Pembroke Fire Department	CMD 07-H10.11
Beatrice Biederman	CMD 07-H10.12
Tanya Sennett	CMD 07-H10.13
Minty of Defence, England	CMD 07-H10.14
Signtext Lighting Inc.	CMD 07-H10.15
Rosalie Bertell	CMD 07-H10.16
Peter Dorda	CMD 07-H10.17
Richard Foster	CMD 07-H10.18
Mary-Ann Foster	CMD 07-H10.19
Patricia Seawright	CMD 07-H10.20
Terry Eggert	CMD 07-H10.21
Carolyn Levesque	CMD 07-H10.22
Betaglow Technologies (H.K.) Limited	CMD 07-H10.23
Nite International	CMD 07-H10.24
MilMark	CMD 07-H10.25
Betalight B.V.	CMD 07-H10.26
Symbolic Displays, Inc.	CMD 07-H10.27
Seiler Instrument & Manufacturing Company, Inc.	CMD 07-H10.28
Cammenga & Associates, Inc.	CMD 07-H10.29
Alfred G. Villeneuve	CMD 07-H10.30
Concerned Citizens of Renfrew County	CMD 07-H10.31
Todd Fletcher	CMD 07-H10.32
Beverly Popkie	CMD 07-H10.33
Tammy Premo	CMD 07-H10.34
Brenda St.Pierre	CMD 07-H10.35
Jessica Throop	CMD 07-H10.36
Virginia Monteleone	CMD 07-H10.37
Shane Sennett	CMD 07-H10.38
David Klentz	CMD 07-H10.39
Rod White	CMD 07-H10.40
Kristen Charles	CMD 07-H10.41

United Way / Centraide of the Upper Ottawa Valley Inc.	CMD 07-H10.42
898702 Ontario Inc.	CMD 07-H10.43
Christine Gauthier	CMD 07-H10.44
Theresa McCann	CMD 07-H10.45
Neil Dunn	CMD 07-H10.46
Margaret Jones	CMD 07-H10.47
Shirley Keller	CMD 07-H10.48
Patrick Boudens	CMD 07-H10.49
Marylin Waito	CMD 07-H10.50
Loretta Young	CMD 07-H10.51
Donna Buder	CMD 07-H10.52
Cathy LaRiviere	CMD 07-H10.53
Darwin Thomas	CMD 07-H10.54
Laura Charles	CMD 07-H10.55
Patricia Thomas	CMD 07-H10.56
Trish Burgess	CMD 07-H10.57
Dave Gareau	CMD 07-H10.58
Charles Caccia	CMD 07-H10.59
Sheri Gareau	CMD 07-H10.60
MBS Sales & Marketing Ltd.	CMD 07-H10.61
Claude and Lori Belec	CMD 07-H10.62
Chris Mitchell	CMD 07-H10.63
Lisa Mitchell	CMD 07-H10.64
Kerry Fortin	CMD 07-H10.65
Valence Young	CMD 07-H10.66
Jennifer Joyce	CMD 07-H10.67
Bill Mackay	CMD 07-H10.68
Christine Stewart and Leah Mackay	CMD 07-H10.69
Katie Belec	CMD 07-H10.70
Carolyn McCumber	CMD 07-H10.71
Jopo Systems Ltd.	CMD 07-H10.72
Nathalie Belleau	CMD 07-H10.73
Nora Kelly	CMD 07-H10.74
Anthony Corriveau	CMD 07-H10.75
John A. Bateson	CMD 07-H10.76
Citizens For Renewable Energy	CMD 07-H10.77
Peggy Patterson	CMD 07-H10.78
Larry TerMarsch	CMD 07-H10.79
Lynn Jones	CMD 07-H10.80