

Record of Proceedings, Including Reasons for Decision

In the Matter of

Applicant SRB Technologies (Canada) Inc.

Subject Application to Resume the Processing and Use
of Tritium at the Gaseous Tritium Light Source
Facility in Pembroke, Ontario

Hearing
Dates April 3 and June 12, 2008

RECORD OF PROCEEDINGS

Applicant: SRB Technologies (Canada) Inc.

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

Purpose: Application to Resume the Processing and Use of Tritium at the Gaseous Tritium Light Source Facility in Pembroke, Ontario

Application received: December 12, 2007

Date(s) of hearing: April 3 and June 12, 2008

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

Members present: M. Binder, Chair R. Barriault
A.R. Graham M. J. McDill
C.R. Barnes A. Harvey

Secretary: M.A. Leblanc
Recording Secretary: P. Bourassa
General Counsel: J. Lavoie

Applicant Represented By		Document Number
• S. Levesque, President		CMD 08-H6.1 CMD 08-H6.1A CMD 08-H6.1B CMD 08-H6.1C
CNSC staff		Document Number
• H. Rabski • A. Erdman • B. Barker • P. Thompson • P. Flavelle	• S. Mihok • R. Lane • K. Bundy • B. Howden	CMD 08-H6 CMD 08-H6.A CMD 08-H6.B CMD 08-H6.C CMD 08-H6.D
Intervenors		
See appendix A		

Licence: Issue New Class IB Nuclear Substance Processing Facility Operating Licence
Revoke Current Class IB Nuclear Substance Processing Facility Possession Licence

Date of Release of Decision: June 26, 2008

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Introduction

1. SRB Technologies (Canada) Inc. (SRBT) has applied to the Canadian Nuclear Safety Commission¹ (CNSC) to amend its Class IB Nuclear Substance Processing Facility Possession Licence. SRBT is seeking authorization to resume the processing and use of tritium for a period of two years at its gaseous tritium light source manufacturing facility in Pembroke, Ontario.
2. On January 31, 2007, following a 2-day public hearing held on October 25 and November 27, 2006, the Canadian Nuclear Safety Commission (CNSC) decided to issue an 18-month Nuclear Substance Processing Facility Possession Licence to SRB Technologies (Canada) Inc. (SRBT). The licence permitted the general possession, transfer, management, storage and disposal of nuclear substances that are part of the Class IB facility located in Pembroke, Ontario. The licence did not allow SRBT to process or use tritium for the purpose of manufacturing gaseous tritium light sources. The Commission had decided not to renew the operating licence based on its opinion that SRBT would not make adequate provision for the protection of the environment when carrying out activities that include the processing of tritium.
3. However, the Commission was also of the opinion that the tritium releases resulting from the operation of the facility did not pose a health and safety risk to the public. The possession licence provided regulatory control of the facility and ensured that the conditions of the licence would not cause an unreasonable risk to 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. The possession licence NSPFLP-13.01/2008 would expire on July 31, 2008.

Issue

4. In considering the application, the Commission was required to decide, pursuant to subsection 24(4) of the *Nuclear Safety and Control Act*² (NSCA):
 - a) if SRBT is qualified to carry on the activity that the 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.

¹ 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.

Public Hearing

5. Pursuant to section 22 of the NSCA, the President of the Commission established a Panel of the Commission (hereinafter referred to as the Commission) to review SRBT's application.
6. The Commission, in making its decision, considered information presented at a public hearing held on April 3, 2008 and June 12, 2008 in Ottawa, Ontario. The public hearing was conducted in accordance with the *Canadian Nuclear Safety Commission Rules of Procedure*³. During the public hearing, the Commission received written submissions and heard oral presentations from CNSC staff (CMD 08-H6, CMD 08-H6.A, CMD 08-H6.B, CMD 08-H6.C, CMD 08-H6.D) and SRBT (CMD 08-H6.1, CMD 08-H6.1A, CMD 08-H6.1B, CMD 08-H6.1C). The Commission also considered oral and written submissions from 39 intervenors (see Appendix A for a detailed list of interventions).
7. On June 11, 2008, SRBT requested that the Commission grant an exemption under section 7 of the NSCA from the requirement of subsection 24(2) of the NSCA since SRBT is in arrears with respect to the payments of the cost recovery adjustments for CNSC fiscal year 2006/2007. SRBT stated that it was unable to make prompt payment on the fee adjustment for the year 2006/2007 as this adjustment more than doubled the total fee for that year. SRBT submitted that, under the current operational restrictions of the possession licence, it did not have the financial capability for full and prompt payment of the fee.

Decision

8. Under subsection 24(2) of the NSCA, the Commission may issue, renew, suspend in whole or in part, amend, revoke or replace a licence on receipt of an application. As SRBT's application did not meet all the requirements of subsection 24(2) regarding cost recovery fees, the Commission considered an exemption request from SRBT before it could proceed with making a licensing decision on SRBT's application.
9. In this regard, pursuant to section 11 of the *General Nuclear Safety and Control Regulations*⁴ (GNSCR), the Commission is of the opinion that the proposed exemption regarding the timing of the payment of cost recovery fee arrears would not pose an unreasonable risk to the environment, the health and safety of persons or to national security, and would not result in a failure to achieve conformity with measures of control and international obligations to which Canada has agreed.

³ S.O.R./2000-211.

⁴ S.O.R./2000-202.

10. Based on its consideration of the matter, as described in more detail in the following sections of this *Record of Proceedings*, the Commission is of the opinion that SRBT is qualified to resume the operation of its facility and carry on the activities that include the processing and use of tritium. The Commission is also satisfied that SRBT, in carrying on these activities, would make adequate provision for the protection of the environment, health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.
11. The Commission notes that the current possession licence issued to SRBT in 2007 is in a class of licence that does not authorize activities related to the operation of a facility. The Commission is thus of the view that an amendment to SRBT's possession licence to authorize the resumption of operations is not the appropriate licensing action, and that an operating licence is required in this case. Therefore, the Commission

exempts SRBT from subsection 24(2) of the *Nuclear Safety and Control Act* (NSCA) and Part 2 of the *CNSC Cost Recovery Fees Regulations*⁵ (CRFR) to the extent to which the requirements apply to the timing of the payments of the prescribed fee arrears and adjustments;

pursuant to paragraph 24(4)(b) of the NSCA, issues a Class IB Nuclear Substance Processing Facility Operating Licence to SRB Technologies (Canada) Inc., for its facility located in Pembroke, Ontario. The licence NSPFOL-13.00/2010 is valid from July 1, 2008 to June 30, 2010; and

revokes the Nuclear Substance Processing Facility Possession Licence NSPFPL-13.01/2008, effective July 1, 2008.

12. Pursuant to subsection 24(5) of the NSCA, the Commission includes in the licence the conditions as recommended by CNSC staff in CMD 08-H6.C, with the addition of condition 1.3, as proposed by CNSC staff during Day Two of the hearing:

1.3 The licensee shall comply with the payment schedules as set out in Appendix G to this licence and with the requirements of the *CNSC Cost Recovery Fee Regulations* for CNSC fiscal year 2008-2009 forward.

13. The Commission also adds the following footnote to the table entitled "Annual Fee Adjustment and Financial Guarantee Payment Schedules" that will form Appendix G of the licence, as proposed by CNSC staff during Day Two of the hearing:

This table is subject to any changes in the decommissioning cost estimate approved by the Commission.

⁵ S.O.R./2003-212.

14. With this decision, the Commission requests that CNSC staff present regular status reports on SRBT's financial commitments to 1) build its fund for the required financial guarantee, as per the payment fee schedule, 2) pay the prescribed fee arrears and annual fee adjustments, as per the payment fee schedule and 3) pay its on-going cost recovery fee, as per the CRFR. The status reports will be presented at each scheduled public meeting of the Commission for the duration of the licence period.
15. The Commission notes that it will consider the necessary compliance measures, which could include the revocation of the operating licence, if, at any time, SRBT fails to comply with the CRFR and the requirements of the NSCA.
16. The Commission requests that CNSC staff report to the Commission any other non-compliance with the licence requirements during the course of the two-year licence period. Any non-compliance report will be presented at public proceedings of the Commission.
17. Finally, the Commission expresses the view that, although it is satisfied with the important improvements that SRBT has implemented to address past deficiencies and with SRBT's demonstrated commitment to becoming a learning organization, enhanced CNSC regulatory oversight is still required for the length of the licence period.

Issues and Commission Findings

18. 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 on 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 in this section.
19. The findings of the Commission presented below are based on the Commission's consideration of all of the information and submissions available for reference on the record for the hearing.

Radiation Protection

Worker Protection

20. SRBT reported that, during its operation of the facility in 2005 and 2006, the occupational doses to workers remained well below the maximum annual dose of 50 mSv (millisieverts) set by the CNSC for a Nuclear Energy Worker. SRBT stated that, based on operational experience and occupational doses associated with specific activities performed during operation, it has set a target to reduce the average overall dose to workers by 15% for the first year under an operating licence.
21. CNSC staff noted that SRBT has made improvements to its radiation protection documentation during the current licence period which include the further development of an ALARA (As Low As Reasonably Achievable) program and review of the action levels. CNSC staff also noted that, as a result of SRBT's organizational study, a human protection coordinator position was created which should improve oversight in this area. CNSC staff submitted that the program meets expectations.
22. CNSC staff's review of worker dose data, for the years 2002-2007, indicate that radiation doses are being adequately controlled at the facility. No worker at SRBT received an effective dose in excess of the regulatory limits, as defined in the *Radiation Protection Regulations*⁶.

Waste Management

23. SRBT's waste management program is currently covered under its radiation protection program. CNSC staff noted that it has reviewed the waste management program during this licence period and has concluded that the program meets requirements. CNSC staff was of the view that any outstanding items, related to facility materials, specific definitions of waste levels, and procedures for the transfer of hazardous waste and decontamination, do not pose a significant risk to the health and safety of workers, the public or the environment.
24. CNSC staff noted that all solid waste containing nuclear substances would be disposed to a licensed waste facility.

Public Protection

25. The Commission notes that the matter of public radiation protection is closely related to environmental protection. Therefore, the section below regarding Environmental Protection contains a further discussion of issues related to human and environmental health, including the various environmental pathways through which humans may be exposed to radiation from the facility.

⁶ S.O.R./2000-207.

26. CNSC staff explained that derived release limits (DRL) are calculated to establish a release limit such that the annual dose limit of 1 millisievert per year (mSv/year) for the public is not exceeded. In this respect, CNSC staff submitted that the DRL calculations to a member of the critical group, with SRBT operating at the proposed release limits, would result in a public dose of 12 microsieverts per year ($\mu\text{Sv}/\text{year}$) or 1.2% of the public dose limit. CNSC staff concluded that operation of SRBT's facility at or below the proposed atmospheric release limit would not result in unreasonable risk to the health and safety of persons.
27. As submitted in past and these licensing hearings, several intervenors expressed concern with the impact the levels of tritium found in the environment may have on public health. Similarly, some intervenors noted the levels of radioactivity in certain vegetables grown in the vicinity of SRBT's facility and expressed their concern the consumption of such vegetables may have on health.
28. In this regard, the Commission sought further information from CNSC staff on the significance of the radioactivity found in the vegetables. CNSC staff noted that free water tritium levels in garden produce collected in September 2007 from residences near the critical group air station were 13 to 326 becquerels per litre (Bq/L) compared to a range of 500 to 949 Bq/L in 2006 or a typical Ontario background ranging from 1.9 to 3.8 Bq/L. In response to the Commission's question, CNSC confirmed that this meant the vegetable were safe to eat. CNSC staff also noted that radiotoxicity of tritium is extremely low and that to be exposed to 1 mSv (the public dose limit), a person would have to take in about 50 million becquerels of tritium.
29. Certain intervenors, including J. Gauthier, L. Jones and the Concerned Citizens of Renfrew County, expressed the view that further studies are needed to assess the health impacts associated with the levels of tritium to which Pembroke residents are exposed. The Commission recognizes that some members of the public continue to express concerns with respect to safe levels of tritium, as was also expressed by intervenors during the preceding licensing hearings held in 2005 and 2006. In response, the Commission is satisfied with CNSC staff's statement made at the 2006 public hearing⁷ that, for doses in the range of the public dose limit, the most likely health outcome is none, and that there are no epidemiological studies that show any health effects at these doses.

⁷ Refer to the *Record of Proceedings, including Reasons for Decision* in the matter of SRB Technologies (Canada) Inc. regarding the Application for the Renewal of Class IB Operating Licence for the Gaseous Tritium Light Source Facility in Pembroke, Ontario, dates of hearing: October 25 and November 27, 2006.

30. In response to the Commission's question regarding the possibility of testing individuals in the community, CNSC staff noted that it has considered over the years the need for additional monitoring, including monitoring of urine samples in members of the public. In 1996, tritium values in urine were reported for members of the public working in very close proximity to the SRBT facility. CNSC staff compared the levels of tritium in urine being reported with the extensive network of air monitoring values that are available for Pembroke. The results from calculations using air concentration to estimate what would be expected to be found in urine were similar to the measured values. Based on this confirmation, CNSC staff noted that it was satisfied that the network of environmental monitoring data is an adequate method to determine the levels of exposure in people, and that this is a very much less intrusive way of measuring what people could be exposed to.

Conclusion on Radiation Protection

31. Considering that the proposed release limits would ensure that doses to the public would remain well below the regulatory public dose limit, the Commission is satisfied that the releases from the proposed processing and use of tritium, taking into consideration the mitigation measures in place, will not pose an unreasonable risk to the public.
32. Based on the information received, the Commission is satisfied that SRBT has made, and will continue to make adequate provisions for the protection of its workers from the effects of radiation. Furthermore, the Commission concludes that the radiation protection program currently implemented at the SRBT facility is adequate to support operational activities.
33. Based on the health studies carried out to date and evidence provided by CNSC staff's radiation protection and environmental risk assessment specialists and epidemiologist, the Commission is of the opinion that tritium releases from the proposed operation of the SRBT facility will not pose an unreasonable risk to the environment or the health and safety of persons. With respect to the intervenors' request that more health studies should be carried out in the community, the Commission notes that all available information indicates that there are no health impacts from the low level of radiation that is released to the environment from the SRBT facility. However, the Commission notes that it would carry out health studies if it needed further information to support international findings and to confirm the regulatory work carried out by CNSC. For the matter of SRBT's licence application, the Commission is satisfied that sufficient scientific information is available to come to the conclusion that no further health studies are needed at this time.

34. As was also expressed during the 2006 public hearing and in line with the Commission's mandate of disseminating scientific information, the Commission remains of the view that further research on tritium releases in Canada is needed to increase current knowledge. The Commission notes that CNSC staff has initiated tritium studies⁸ with the objective to enhance information available to guide regulatory oversight of tritium processing and tritium releases in Canada. The first result of these studies has been reported to the Commission in a public meeting held on September 12, 2007⁹ and a draft report is being finalized that will look at the health consequences of tritium. As the studies are not expected to be completed until 2010, the Commission is satisfied that CNSC staff will be reporting regularly on its findings throughout the studies and that if any information or conclusions are made that would have a significant impact on the regulatory oversight of this facility, appropriate and relevant action would be taken. The Commission is thus of the view that the fact the studies are still on-going is not an impediment to the consideration of this licence application.
35. The Commission is also satisfied that SRBT would make adequate provisions for the protection of the public from radiation at its facility if it were to resume its processing operations. Further discussion on this issue is provided in the following section on Environmental Protection.

Environmental Protection

36. In considering SRBT's performance in protecting the environment, the Commission considered information on the adequacy and performance of SRBT's environmental protection program, including with respect to effluent monitoring, environmental monitoring, and emission controls.

Environmental Monitoring Program

37. SRBT provided information on the environmental monitoring network which includes 40 air monitoring stations, 55 wells of various depths and of which 38 are located within 150 metres from the stack, and other sampling media. SRBT also noted that its environmental monitoring program also consists of sampling produce from at least six local gardens. SRBT stated that the results show that concentrations dropped significantly during 2006 for both types of sampling. The Commission notes that SRBT was authorized to process tritium under an operating licence in 2006.

⁸ The Commission invites members of the public to follow the progress of the CNSC-led tritium studies. Information regarding these studies is found on the CNSC Web site and, when presented at public meetings of the Commission, through the Commission Member Documents (CMD), including meeting agendas, transcripts and minutes.

⁹ Refer to the Commission Meeting Minutes of the public meeting held on September 12 and 13, 2007.

38. SRBT noted that it will continue to monitor tritium concentrations in the facility's downspouts and in precipitation during the proposed licence period. SRBT will also report and analyze measurements as part of the environment monitoring program quarterly report.
39. CNSC staff noted that it had reviewed SRBT's environmental management system document and found it acceptable.
40. CNSC staff noted that precise and representative air monitoring data, from 31 local stations and several distant controls managed by a third party, became available from January 2006 onwards to characterize the pattern of atmospheric dispersion of tritium near the facility. SRBT compared measured and predicted tritium in air concentrations for conditions and releases in 2006 that were similar in nature and magnitude to the proposed operations. CNSC staff noted that this comparison has demonstrated that operation of the facility at the proposed limits would result in concentrations of tritium in soil / ground water that can be predicted with reasonable confidence from atmospheric deposition. In addition to air modeling, CNSC staff noted that recent measured data from monitoring wells, adjusted for historical releases and expected ground water dynamics, support the predictions of the atmospheric model.
41. Given SRBT's proposal to not operate during precipitation, combined with appropriate action levels applied to monitoring the stack emissions, CNSC staff concluded that there should be abundant conservatism in the operational framework such that a resumption of processing of tritium will not pose an unreasonable risk to the environment or health and safety of persons. However, CNSC staff recommended that the proposed licence contain a condition for SRBT to perform some additional environmental monitoring activities, including wet deposition and weather monitoring, to verify assumptions.
42. CNSC staff concluded that SRBT's detailed analysis of recent and historical monitoring data has supported CNSC staff's understanding of the environmental behaviour of tritium, leaving minimal uncertainty in the overall environmental consequences of a resumption of tritium processing.
43. Given the close proximity of residential areas to SRBT, CNSC staff noted that it had independently assessed SRBT's model predictions of stack emission dispersion and loadings to the environment very close to the facility, taking into account SRBT's proposal to only process tritium during periods of non-precipitation. CNSC staff stated that the results of its assessment agree in general with those from the modeling conducted by SRBT.

Effluent Monitoring

44. CNSC staff reported that SRBT's effluent monitoring program and its implementation meet requirements. CNSC staff noted that SRBT has demonstrated that the stacks are performing as designed and the effective stack height is being maintained. Real-time monitoring ensures checks on emission peaks during daily operations.
45. SRBT proposed lower release limits than the current release limits in its possession licence. For liquid releases, SRBT noted that it collects its effluents and measures regularly the levels of radioactivity prior to its release to the sewer system and maintains records at the facility.
46. CNSC staff noted SRBT's proposed lower release limits for the future operation of the facility would represent 50% of the limits of the current possession licence. CNSC staff also noted that SRBT's proposed action levels, which could indicate a loss of control of some aspect of the operations and enable corrective action to be taken well before the licence limits are approached or exceeded, are acceptable. CNSC staff explained that it reviewed the proposed weekly action levels for the stack emissions against proposed operations, public dose limits, and ALARA (As Low As Reasonable Achievable). CNSC staff concluded that SRBT's proposed action levels are adequate and provide abundant conservatism relative to observed and predicted monitoring data. This will ensure that the public dose would remain at a small fraction of the regulatory public dose limit.
47. The Concerned Citizens of Renfrew County expressed its view that if SRBT were to be authorized to process tritium, the level of radioactive tritium released to the environment would remain unacceptable, even if release limits were to be reduced. The intervenor further noted that tritium behaviour in the atmosphere is not easily predicted and thus SRBT should not be allowed to operate outside of a closed system, within close proximity of a residential area.
48. With respect to liquid releases, CNSC staff recommended the same liquid release limit to the sewer system for the proposed operation of the facility that is currently enforced in the possession licence — 200 gigabecquerel per year (GBq/year) of tritium (water soluble).
49. K. O'Grady, in her intervention, expressed concern that chronic release of tritium into Pembroke's sanitary system will contaminate the city's infrastructure. CNSC staff explained that the release limit proposed in the licence represents one fifth of the generic clearance level based on international standards. This is the equivalent of receiving a dose of 10 μ Sv (compared to the public dose limit of 1000 μ Sv).

Groundwater Monitoring

50. CNSC staff provided information on the groundwater studies being carried out by SRBT with the intent that SRBT could identify, control and mitigate the sources of tritium contamination. In this respect, SRBT submitted a comprehensive report to CNSC staff that documents more than two years of groundwater studies, including hydrogeologic monitoring and testing, and tritium measurements in soil, groundwater, surface water and precipitation. CNSC staff noted that the monitoring data compiled in the Comprehensive Report on Groundwater indicate that the tritium concentrations in most of the monitoring wells are declining or are stable. CNSC staff noted that tritium concentrations in residential wells are low, with the majority having a concentration that is 5% of the Canadian Drinking Water Quality Guidelines (CDWQG).
51. SRBT was also able to develop a conceptual model of groundwater flow and tritium transport from this data. SRBT used the model to determine that lateral groundwater movement is too slow (at less than 5 meters/year) for the tritium in the groundwater on the SRBT site to have migrated to the residential wells. CNSC staff accepted SRBT's conclusion that existing tritium contamination in groundwater onsite will decay to acceptable levels before it reaches any off-site water supply well. CNSC also accepted SRBT's assertion that the current system of groundwater monitoring wells is adequate to monitor tritium migration from the SRBT site.
52. The Commission, noting that there was a lack of understanding of the sources of tritium contamination and their distribution in the past, sought assurances that the applicant had now conducted sufficient analysis to address the issue. SRBT responded that its systematic analysis of tritium sources has provided full understanding of all the sources associated with past, present and resumption of operations. CNSC staff confirmed that SRBT had not overlooked any tritium sources.
53. With respect to tritium distribution in the environment, CNSC staff noted that the issue of concern raised in the past was the potential for the contamination to be transported offsite and that the concentrations would be at such a level that would prevent the potential use of groundwater as a resource in the future. From the data that has been obtained to date, CNSC staff expressed its confidence that tritium concentrations in the groundwater are now well understood. CNSC staff further noted that it had carried out independent work on the dispersion of tritium near the facility and that its results confirmed SRBT's conclusions. CNSC staff concluded that the groundwater will continue to recover to within the CDWQGs and thus not pose a future restriction to its use as a resource.
54. CNSC staff agreed with SRBT's conclusion that at this time there is no need for further remedial measures. CNSC staff explained that allowing the tritium to decay underground does not pose a risk and is preferable to bringing the tritium to the surface for decay since this would pose additional risk of exposure of workers handling the material and possible contamination of the surface environment.

Emission Control

55. SRBT noted that it had implemented effective mitigation measures during the last 21 weeks of operation of the facility from late 2006 and up until it was issued a possession licence. These mitigation measures will result in emissions during processing that would be 34% of what they were in 2006. SRBT noted that this would represent a dose to the public of less than 1% of the regulatory public dose limit.
56. SRBT noted that a comprehensive report on groundwater studies was submitted to CNSC and the Ontario Ministry of Environment in January 2008. The report confirmed that the observed tritium concentrations in groundwater fell within the range expected for air emissions and dispersion. Soil samples also showed decreases in concentrations as a result of decreases in emissions. SRBT further noted that it would continue to work on identifying and implementing additional mitigation measures. SRBT submitted that lower emissions, due in part to SRBT's commitment to not process tritium during precipitation, along with natural decay would eliminate all tritium concentrations in groundwater in excess of the CDWQG within the next few decades.
57. Several intervenors expressed the view that the tritium levels in drinking water were not acceptable and pose an unreasonable risk to the public. L. Jones, in her intervention, was of the view that the Canadian guidelines were too lax and thus should be revisited to align with those of the European Commission and the US Environmental Protection Agency.
58. The Commission sought further information regarding the intervenors' concerns. CNSC staff explained that the considerations made to establish guidelines will vary from country to country. CNSC staff noted that Canada has adopted the recommendations from the World Health Organization, which are based strictly on the level of risk associated with the radionuclides. CNSC staff further noted that the drinking water supplies around the Pembroke area are at a level between 5 to 10 Bq/litre, representing a small fraction of the CDWQG. SRBT added that an individual using the water from a well located on the edge of the property for an entire year would receive a dose of 0.025 mSv, representing 2.5% of the annual public dose limit.
59. With respect to facility emission controls, CNCS staff noted the number of improvements that SRBT has implemented to its operation to reduce releases to the environment. As a result of these changes, CNSC staff observed, during SRBT's latest operation in 2006/2007, significant reductions in emissions down to a level of approximately 1% of that which existed in 2005. CNSC staff concluded that SRBT has made improvements in this area of emission control such that the proposed operating emission would be protective of the environment and human health and consistent with the ALARA principle.

Conclusion on Environmental Protection

60. The Commission concurs with CNSC staff that, during the current licence period, SRBT has adequately demonstrated an understanding of the surface and groundwater flow system near its facility. The Commission is also satisfied that the atmospheric modeling has shown to be adequate to predict the concentrations. However, the Commission is also of the view that continued monitoring is necessary under operating conditions. The Commission understands thus that SRBT will continue its groundwater monitoring during the proposed licence period to confirm that there is no unreasonable risk from tritium migrating from the site.
61. The Commission is satisfied with the work undertaken by SRBT to correct the environmental protection program deficiencies that had been at the crux of the issues for the past several years. The Commission is of the view that SRBT has now demonstrated an understanding of and commitment to environmental protection. The Commission is also of the view that SRBT has the ability to meet the requirements of the NSCA with respect to the protection of the environment while processing and using tritium at its facility.
62. The Commission considered SRBT's recent performance with respect to environmental protection, the improvements it has made to its program, changes to its operation, and its commitment to continue its efforts to further reduce the environmental impact of its operations. Based on this information, the Commission is of the opinion that, pursuant to paragraph 12(1)(f) of the GNSCR, SRBT will take all reasonable precautions to protect the environment and to control the release of a radioactive nuclear substance within the site of the licensed activity and into the environment during the proposed activities that include processing tritium.

Operating Performance

63. The Commission considered SRBT's current and past operating performance as an indication of its qualifications to operate its facility and, in doing so, to provide adequate protection for the environment, persons, national security and international obligations.
64. SRBT noted that it has submitted a plan of resumption in December 2007 to identify the measures to be taken if it was authorized to process and use tritium at its facility. SRBT also noted that it would no longer be operating its reclamation unit and would not process tritium during periods of precipitation. SRBT also noted that equipment has been maintained according to the maintenance program and under the requirements of the existing licence and that the systems would be tested before initiating any processing.

65. CNSC staff reported that it had conducted two compliance inspections and visited the facility on three occasions during the licence period. CNSC staff stated that SRBT has managed the facility according to its licence. CNSC staff was of the view that SRBT has the necessary operational procedures in place to support the activities that an operating licence would authorize.
66. CNSC staff submitted that additional compliance inspections as well as unannounced inspections would be conducted if SRBT were to resume its operation of the facility.
67. The Commission sought assurances that the training component would be adequate if SRBT were to resume operation. SRBT stated that supervised refresher training would be provided to its staff who would be former experienced employees. CNSC staff noted that the resumption plan had a large component on staff training and that it was considered adequate for the proposed activities. CNSC staff noted that it would examine the adequacy of the training provided to workers during its compliance inspections.
68. Considering that the Commission had not been satisfied with the past performance of SRBT under an operating licence, the Commission sought assurance from CNSC staff that the licensee had now the capacity to carry out the activities it seeks to do and that it would proactively take the initiative to ensure continued safe operation. CNSC staff responded that SRBT had instituted continuous learning within the organization and has demonstrated a positive change in attitude towards safety culture. However, CNSC staff stated that it would continue its enhanced compliance monitoring activities if the operation of the facility was to resume.
69. With respect to conventional health and safety, the Commission asked whether SRBT had been able to maintain its program during the licence period considering that the company was currently experiencing financial restraints. SRBT stated that it had three inspections from the Ontario Ministry of Labour in 2007 and that only minor issues were raised, which were promptly addressed. CNSC staff added that it works closely with both the provincial and federal authorities to ensure that all aspects are covered. Furthermore, CNSC staff noted that it would be reviewing SRBT's gap analysis against the Canada Labour Code.
70. The Commission sought assurance that used products which were processed through the reclamation unit in the past, would now be disposed of adequately. SRBT explained that it would continue to offer its clients the possibility to send their expired devices back to SRBT who would then send the products to a licensed waste facility for disposal. CNSC staff explained that an end-user of a tritium safety sign that meets the exemption criteria in the *Nuclear Substance and Radiation Devices Regulations*¹⁰ (NSRDR) is under no obligation to send its sign back to the distributor; it can safely dispose of the device in a landfill. CNSC staff noted that if a tritium device is exported outside Canada, the person possessing the sign in the country of export will be required

¹⁰ S.O.R./200-207.

to comply with the regulations in that country. The person could send the device back to the distributor in Canada at the end of the device's usefulness, but has no obligation to do so.

71. The Commission asked CNSC staff how it would confirm that SRBT was not operating during precipitation. CNSC staff responded that the licensee keeps a logbook where, among other information, precipitation conditions are recorded while operational activities are recorded by a strip chart from the emission control monitoring system. CNSC staff was of the view that these recordings, in addition to sporadic visits, are sufficient to verify that SRBT would be conforming to its own operational procedures. In this respect, CNSC staff noted that this was not a licence condition but rather a prudent operational restriction that SRBT has imposed on its facility to not operate during precipitation.

With respect to emergency preparedness and a concern raised on this matter by an intervenor, the Commission sought further information on the measures that SRBT has in place. CNSC staff confirmed that SRBT has an emergency plan in place and that SRBT was currently revising its documentation to address certain comments. CNSC staff noted that the plan is not extensive but reflects the needs for this type of facility.

Conclusion on Operating Performance

72. Based on the information received, the Commission is of the view that SRBT is qualified to carry on the activities that an operating licence would authorize while assuring that the environment and public health would be protected under any reasonably foreseeable unplanned event.
73. However, as noted during the 2006 licensing hearing, the Commission is still of the view that there is little information on what would be considered best practices for tritium-processing facilities. Thus the Commission is looking forward to the results of further study and evaluation of tritium processing facilities in the world, currently being carried out by CNSC staff under the tritium studies.

Performance Assurance

74. In addition to examining past performance, the Commission examined certain aspects of SRBT's operations and management to obtain an indication about the likelihood of acceptable future performance of the facility.
75. SRBT presented elements of the corrective action plan it has developed to address a number of deficiencies identified by CNSC over the last several years.

Quality Assurance

76. SRBT provided an overview of the changes it has made with the objective to become a safety leader. In this regard, SRBT developed an action plan to audit all activities associated with developing, managing and implementing its safety programs. SRBT submitted that it recognizes that a learning organization is able to use the ideas of those at all levels in the organization and that employees are more likely to be committed to the implementation of improvements if they have been intimately involved in generating ideas for that improvement.
77. CNSC staff stated that SRBT has taken positive steps to improve the management of its business in order to respond actively to emerging issues. CNSC staff noted that SRBT has adopted a methodology with which to conduct root cause investigations to help in identifying and correcting deficiencies and preventing their recurrence. CNSC staff submitted that investigation of not only deficiencies but also potential deficiencies will be a more proactive approach to correcting problems.
78. With respect to the organizational chart, CNSC staff noted that SRBT had expanded the management level and had clearly described responsibilities for each position. CNSC staff considered that this change should improve SRBT's overall performance and ability to respond in a more proactive manner to potential problems.
79. CNSC staff concluded that the quality assurance program meets requirements. CNSC staff noted that it had reviewed SRBT's quality assurance document which was revised to address all comments previously raised by CNSC. CNSC staff also noted that SRBT's revised contractor management program is acceptable. CNSC staff noted that it will perform an inspection when SRBT completes the implementation of the program. Although the program has some deficiencies, CNSC staff was of the view that the deficiencies should not pose an unreasonable risk to the maintenance of health, safety, security and environmental protection.
80. With respect to an intervenor's concern regarding the possibility of engineering work being carried out by the licensee without an appropriate licence, the Commission is satisfied that CNSC staff will be following up with the Professional Engineers of Ontario on this matter.

Organizational Management

81. CNSC staff submitted that the organizational study carried out by SRBT was comprehensive and covered all organization and management expectations of the International Atomic Energy Agency (IAEA) INSAG-15¹¹. CNSC staff also noted that SRBT has made a commitment to continuous improvement in order to meet industry best practices.

¹¹ INSAG-15: Key Practical Issues in Strengthening Safety Culture, IAEA, International Nuclear Safety Advisory Group, 2002.

82. CNSC staff noted the positive steps taken by SRBT to address the Commission's concerns raised during the previous licensing hearings. CNSC staff concluded that SRBT has made adjustments such that it has better provisions for the management of operational activities and contractors at the facility. CNSC staff also noted that it was of the view that SRBT was now qualified to carry out its own emission monitoring stack verification. In this regard, SRBT noted that, although it was also of the view that it is capable of conducting this verification, it would continue to use a third party in recognition of the public opinion that third-party results are more credible.

Conclusion on Performance Assurance

83. The Commission recognizes that SRBT has improved its quality assurance program and organizational management oversight with the objective to be in a position to support its application to resume full operation of the facility. The Commission is also satisfied that SRBT has implemented a process that should enable it to anticipate and respond proactively to emerging performance problems and issues.
84. The Commission notes however that SRBT has yet to demonstrate through its action whether the changes it has made will ensure timely, proactive responses from the licensee during activities associated with the resumption of operation. The Commission thus requests that CNSC staff closely monitor the performance of the licensee during the next licensing period.

Fire Protection

85. SRBT noted the improvements it made to its fire protection program to increase protection and ensure compliance with relevant codes and standards. It instituted yearly inspections from both a third-party fire protection consultant and the Pembroke Fire Department. Other improvements include the introduction of fire responder and staff training, yearly fire alarm drills, installation of a sprinkler system throughout the facility and reduction of combustible loadings.
86. CNSC staff stated that SRBT's Fire Protection Program and its implementation meet requirements although there remain minor changes to be made to the documentation. CNSC staff stated that the past improvements at the facility such as the installation of the fire sprinkler system and the improvements in the fire protection program increase the level of safety with respect to protection from fire at the facility.
87. The Pembroke Fire Department attested to SRBT's performance with respect to fire protection and provided an overview of the activities that it coordinates with SRBT in this respect.
88. Based on the information received, the Commission concludes that fire protection at SRBT's facility is adequate for the proposed operations and licence period.

Security

89. Based on the protected information provided by CNSC staff, the Commission concludes that SRBT has made, and will continue to make, adequate provisions for ensuring the physical security of its facility.

Decommissioning Plan and Financial Guarantee

90. In order to ensure that adequate resources will be available to meet the same regulatory requirements for safety, environmental protection and security during the future decommissioning of SRBT's facility, the Commission requires that adequate plans and financial guarantees for decommissioning and long-term management of waste be put in place and maintained in a manner acceptable to the CNSC.
91. SRBT noted that it has a financial guarantee in place to cover the safe state of closure of the facility. The financial guarantee was submitted in the form of an Escrow Agreement and a Financial Security and Access Agreement. SRBT proposed a payment plan to grow the fund necessary for the full decommissioning of the facility. According to this plan, submitted in a table entitled "Annual Fee Adjustment and Financial Guarantee Payment Schedules", SRBT stated that the full amount would be in place by April 30, 2014. CNSC staff noted that this plan would be subject to any changes in the decommissioning cost estimate approved by the Commission.
92. The Commission sought assurances that an aggressive payment schedule was proposed so that SRBT could have a financial guarantee in place at the earliest. In this regard, the Commission asked if interest from the escrow account was being deposited into the account. CNSC staff responded that a proposed licence condition was being recommended to require SRBT to put any earned interest back into the escrow account.
93. Considering that the matter of financial guarantees and SRBT's past and current financial restraints to build the necessary funds have been the subject of several Commission hearings in the past, the Commission expressed its concern that SRBT was still not in a position to fulfil its obligations. SRBT acknowledged that it will take time to build its business up from its previous operational state, but stated that the proposed payment plan took this into consideration and was based on conservative revenues going forward. SRBT was confident that not only would it meet the proposed payment schedules, but would increase payments in the event that revenues would exceed expectations.
94. Several intervenors expressed concern that SRBT has failed to build the required fund for the financial guarantee. Concerned Citizens of Renfrew County submitted that a licence should not be issued as this failure to comply with a licence condition is an indication that SRBT is not qualified to carry on the activities it seeks to do.

95. The Commission also expresses concern that SRBT has not yet fulfilled the requirement to have a financial guarantee in place for the full decommissioning of the facility. However, the Commission does not view that this situation is an indication that SRBT is not qualified to carry on activities related to processing and using tritium.
96. The Commission is satisfied with the proposed payment plan that SRBT has submitted and that CNSC staff proposes to add as a licence condition. The Commission is of the view that this payment plan is realistic and achievable and notes that it will be monitoring compliance with this condition very closely. The Commission also notes that several other licensees are building up, as will be the case for SRBT, their financial guarantee so that a full amount is in place in the future.
97. In this respect, the Commission is requesting that a brief report on the status of the regular deposits to build the financial guarantee be presented at each Commission public meeting for the duration of the licence period. Until the financial guarantee is fully in place, the Commission is satisfied that, as a minimum, SRBT has built sufficient funds for the safe state of closure of the facility.

International Obligations

98. CNSC staff proposed the inclusion of the safeguard conditions that are currently on the possession licence. These conditions will facilitate the implementation of Canada's international safeguards obligations.
99. CNSC staff explained that a CNSC-issued licence is required to export tritium for any end-use. CNSC's assessment of the export licence application includes consideration of the potential risk of diversion of tritium to a nuclear weapons program. This is to ensure that the export is in keeping with Canada's non-proliferation policy and international commitments. The applicant must provide detailed information on the quantities, packaging and the end-use of the items proposed for export. CNSC staff verifies the accuracy of the information provided through review of literature, by contacting the recipient directly or, if necessary, by review of applicable intelligence.
100. CNSC staff reported that SRBT complies with the NSCA to seek regulatory authorization for the export of its products. SRBT supplies all information pertinent to the authorization process when submitting applications for authorization to export controlled nuclear substances pursuant to the requirements of the *Nuclear Non-proliferation Import and Export Control Regulations*¹².
101. The Commission is of the opinion that SRBT would make adequate provisions in the areas of safeguards and non-proliferation if it were to resume the processing operation of its facility.

¹² S.O.R./200-210.

Public Information

102. SRBT provided an overview of the improvements it has made to its Public Information Program. SRBT noted that its enhanced public information program includes more interaction with the public and with special interest groups in particular. SRBT also formed a public information program committee and created “public relations material designer” and “public relations coordinator” functions within the company.
103. SRBT stated that it had developed new goals to be transparent, visible and open with its community, as part of its improvement initiatives to become a licensee whose overriding corporate objective is the company’s commitment to nuclear and environmental safety. SRBT validated this statement by providing further detail on the various methods by which it informs the public, via its Web site and literature for example, and by holding public meetings. SRBT noted that it made certain operational decisions as a result of its exchanges with concerned citizens, such as to not operate its reclamation unit and to have third party monitoring.
104. CNSC staff noted SRBT’s focus to achieve better clarity with the community and public interest groups in order to earn their confidence and trust, as well as build stronger relationships with all its stakeholders. CNSC staff is satisfied that SRBT’s enhanced public information program meets the criteria found in CNSC Regulatory Guide G-217, *Licensee Public Information Programs* (January 2004). CNSC staff recommended that SRBT continue to be vigilant and transparent about its outreach and communications efforts with the public and special interest groups.
105. Based on the information received, the Commission is satisfied with the improvements made to date and is of the view that SRBT’s public information program is adequate for the proposed licence period.

Canadian Environmental Assessment Act

106. Before making a licensing decision, the Commission must be satisfied that all applicable requirements of the *Canadian Environmental Assessment Act*¹³ (CEAA) have been fulfilled.
107. CNSC staff submitted its recommendation to the Commission on its determination whether an environmental assessment was needed before the Commission could consider SRBT’s application to resume operations of its facility. In its view, CNSC staff stated that an environmental assessment is not required pursuant to subsection 5(1) of the CEAA, because of the application of the CEAA *Exclusion List Regulations*¹⁴.

¹³ S.C. 1992,c.37.

¹⁴ S.O.R./94-639.

108. CNSC explained that SRBT is proposing to operate in the same manner as was assessed in the November 2000 Environment Assessment Screening Report. SRBT is also proposing to continue to implement a follow-up program, which will consist of the continuation of the current environmental monitoring program. This monitoring program has been improved, as SRBT has added groundwater sampling. CNSC staff assessed SRBT's proposal and concluded that the *Exclusion List Regulations* apply.
109. The Commission concluded that an environmental assessment of SRBT's proposal to resume the processing and use of tritium at the facility under CEAA is not required before the Commission can consider SRBT's licence application.
110. The Commission is thus satisfied that the requirements of the CEAA for an environmental assessment of the activities to be authorized under an operating licence have been fulfilled.

Cost Recovery

111. Before making a licensing decision, the Commission must be satisfied that all applicable requirements of the NSCA have been fulfilled. This includes the requirement that a licence application meet the requirements of subsection 24(2) of the NSCA.
112. The Commission notes that SRBT's application to resume the operation of its facility does not meet the requirements of subsection 24(2) of the NSCA as SRBT is currently in arrears regarding the payment of prescribed cost recovery fees.
113. The Commission notes that, pursuant to section 7 of the NSCA, the Commission may, in accordance with the regulations, exempt any activity, person, class of person or quantity of a nuclear substance, temporarily or permanently, from the application of the NSCA or the regulations or any provision thereof. For the purpose of considering SRBT's application, the Commission considered a request for exemption, as it pertains to the timing of the payment of the arrears of the prescribed fee, from the application of subsection 24(2) of the NSCA and from Part 2 of the CRFR.
114. In considering these exemptions, the Commission sought assurances that SRBT's proposed payment plan, as submitted by the applicant on June 11, 2008 and reviewed by CNSC staff, was realistic and feasible. The plan addresses the past fee adjustments for CNSC fiscal year 2006/2007, which amounts to approximately \$195,000 as well as the fee adjustment for fiscal year 2007/2008, which amounts to approximately \$175,000. SRBT responded that this proposed plan was based on a conservative estimate of its projected revenues if it were to resume its operations. SRBT also noted that it was confident that it would meet this commitment and, in addition, would make increased contributions if either revenue or net profit were to exceed projections. CNSC staff was of the view that the proposed payment schedule was adequate.

115. Before considering the exemptions, however, the Commission must be satisfied that the requirements of section 11 of the *General Nuclear Safety and Control Regulations* are met. In this regard, the Commission is of the opinion that the proposed exemption would not pose an unreasonable risk to the environment or the health and safety of persons; would not pose an unreasonable risk to national security; and would not result in a failure to achieve conformity with measures of control and international obligations to which Canada has agreed.
116. The Commission temporarily exempts SRBT from subsection 24(2) of the NSCA and Part 2 of the CRFR to the extent to which the requirements apply to the timing of the payments of the prescribed fee arrears. The exemption is conditional upon the payment of the fees as per the proposed schedule and subject to any further decisions by the Commission.

Licence Length

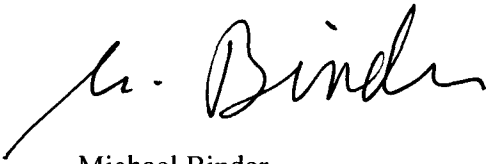
117. SRBT has requested a licence amendment to authorize the resumption of the operation to process and use tritium at its facility for a period of two years. CNSC staff has also recommended that a licence to resume operation be valid for a two-year period. CNSC staff took into consideration that it is currently conducting tritium studies and that it plans to complete the last topic early in 2010. CNSC staff was of the view that the proposed licence expiry date would provide CNSC staff time to complete the analysis of regulatory practices and make recommendations, if required, for changes to the regulatory framework for tritium processing facilities in Canada, including SRBT.
118. CNSC staff noted that it will submit a significant development report to the Commission should a situation arise that could impair SRBT's ability to meet its obligations with respect to the protection of health, safety and the environment, the maintenance of security and compliance with international obligations.
119. Several intervenors, including members of the public, municipal and provincial elected officials, businesses, and clients supported SRBT's request for a two-year licence.
120. Several intervenors representing community-based organizations and members of the public did not support SRBT's application. The Concerned Citizens of Renfrew County submitted that the Commission cannot renew the licence as the continued operation of the facility would be inconsistent with the NSCA as it appears impossible to limit risk to the environment. This intervenor, along with several others, expressed the view that the potential impact of the facility on future use of land should also be a consideration for not renewing the operating licence.

121. The Commission considered that information submitted and acknowledges that some members of the public would support the closure of the facility. However, considering the release limits and operational controls to be in place when SRBT resumes operation, the Commission is satisfied that the resulting dose to the public is a very small fraction of the regulatory dose limit which has been recognized by international experts as having no health consequences. The Commission is also satisfied that the level of tritium contamination in the surrounding environment will decrease over time to levels that will not prevent future use of the land.
122. The Commission is of the view that the issuance of an operating licence for a two-year period is appropriate at this time. Although SRBT has convinced the Commission that it meets the requirements of the NSCA and associated regulations to carry on the activities that an operating licence will authorize, the Commission notes that SRBT has to continue to demonstrate that it is qualified carry on the activities and that it will continue to make adequate provisions to protect the health and safety of the public and the environment throughout the licence period. The Commission is therefore requesting that enhanced monitoring of the facility by CNSC staff be effected throughout the period. The Commission also notes that the licence period gives the licensee an opportunity to further build its decommissioning fund and reduce its fee arrears.
123. With respect to interim reporting, the Commission expects CNSC staff to report to the Commission any non-compliance with the licence.

Conclusion

124. 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.
125. Based on this information, the Commission concludes that SRBT has made major improvements to both its understanding of its responsibilities under the NSCA and associated regulations and to its qualifications and performance in the area of environmental protection.
126. Considering that SRBT's licence application did not meet all the requirements of subsection 24(2) of the NSCA, the Commission considered the implication of exempting SRBT from certain requirements of the NSCA and the CNSC CRFR to the extent to which they apply to the timing of the payment of the prescribed fee arrears and adjustments. In this regard, the Commission is of the view that the payment plan for the arrears is acceptable. Furthermore, the Commission is of the view that granting these exemptions would not pose an unreasonable risk to the environment or the health and safety of persons; would not pose an unreasonable risk to national security; and would not result in a failure to achieve conformity with measures of control and international obligations to which Canada has agreed. The Commission therefore exempts SRBT from subsection 24(2) of the NSCA and Part 2 of the *CNSC Cost Recovery Fees Regulations*, for a temporary period ending at the date of expiry of the CNSC licence issued to SRBT.

127. The Commission concludes that SRBT is qualified to carry on the activities that would be permitted under an operating licence. 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.
128. The Commission therefore issues, pursuant to section 24 of the NSCA, a Nuclear Substance Processing Facility Operating Licence NSPFOL-13.00/2010 to SRBT, for its facility located in Pembroke, Ontario. The licence is valid from July 1, 2008 to June 30, 2010.
129. The Commission includes in the licence the conditions proposed by CNSC staff in CMD 08-H6.C and as modified in paragraphs 10 and 11 of this Record of Proceedings.
130. With this decision, the Commission requests that the CNSC staff report to the Commission if SRBT fails to respect the licence conditions. The Commission notes that appropriate regulatory action will be considered if there is non-compliance on the part of SRBT.
131. In addition, pursuant to section 25 of the NSCA and subsection 8(2) of the GNSCR, and effective July 1, 2008, the Commission revokes SRBT's Nuclear Substance Processing Facility Possession Licence NSPFPL-13.01/2008. The Commission is of the view that this licence is not required once the operating licence comes into effect as certain activities currently authorized in the possession licence will now be included in the operating licence.



Michael Binder,
President
Canadian Nuclear Safety Commission

Date of Release of Decision: June 26, 2008

Appendix A – Intervenors

Intervenors	Document Number
Jim and Mary Yuill	CMD 08-H6.2
Jake Bernard	CMD 08-H6.3
Wesley Stuber	CMD 08-H6.4
Jessica Gauthier	CMD 08-H6.5 CMD 08-H6.5.A
Valence Young	CMD 08-H6.6 CMD 08-H6.6A
Kelly O’Grady	CMD 08-H6.7 CMD 08-H6.7A
Concerned Citizens of Renfrew County, represented by	CMD 08-H6.8
Lynn Jones	CMD 08-H6.9 CMD 08-H6.9A
Venetia Crawford	CMD 08-H6.10
United Way/ Centraide of the Upper Ottawa Valley Inc.	CMD 08-H6.11
Kool Temp / Valley Refrigeration	CMD 08-H6.12
MilMark U.K.	CMD 08-H6.13
898702 Ontario Inc.	CMD 08-H6.14
Kerry Fortin	CMD 08-H6.15 CMD 08-H6.15A
Betalign B.V.	CMD 08-H6.16
Kathleen Hoffman	CMD 08-H6.17
Rhéaume M. Chaput	CMD 08-H6.18
Pembroke Fire Department	CMD 08-H6.19
Staff of SRB Technologies (Canada) Inc.	CMD 08-H6.20
City of Pembroke Administration Department	CMD 08-H6.21
Jopo Systems Ltd.	CMD 08-H6.22
Claude Belec	CMD 08-H6.23
Alfred G. Villeneuve	CMD 08-H6.24
Stephen Blok	CMD 08-H6.25
Anthony Contant	CMD 08-H6.26
Wayne Peever	CMD 08-H6.27
Prevent Cancer Now	CMD 08-H6.28
Joey Allen	CMD 08-H6.29
Andre R. Pellerin	CMD 08-H6.30
Anthony Corriveau	CMD 08-H6.31
Cheryl Gallant, M.P., Renfrew – Nipissing – Pembroke	CMD 08-H6.32
City of Pembroke	CMD 08-H6.33
Symbolic Displays Inc.	CMD 08-H6.34
Seiler Instrument and Manufacturing Company Inc.	CMD 08-H6.35
Tony Gardynik	CMD 08-H6.37
Larry TerMarsch	CMD 08-H6.38
Patricia Seawright	CMD 08-H6.39
Beatrice Biederman	CMD 08-H6.40