



**Written submission from
Nordion (Canada) Inc.**

**Mémoire de
Nordion (Canada) Inc.**

In the Matter of

À l'égard de

**Application to transfer Nordion (Canada)
Inc.'s Nuclear Substance Processing Facility
Licence following a change of corporate
number**

**Demande de transfert du permis d'exploitation
d'une installation de traitement des substances
nucléaires de Nordion (Canada) Inc. suite à un
changement de numéro d'entreprise**

Hearing in writing based on written
submissions

Audience fondée sur des mémoires

February 2019

Février 2019

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laissée en blanc*

November 8, 2018

Mr. Marc Leblanc, Commission Secretary
Secretariat
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater St., Ottawa, Ontario, K1P 5S9

SUBJECT: Request to Transfer Nordion Licenses NSPFOL-11A.00/2025 and EL-11A.00/2025

Dear Mr. Leblanc:

As requested by the CNSC by email on October 17, 2018, Nordion (Canada) Inc. ("Nordion"), with corporate number 891613-6, is requesting that the CNSC transfer Nordion's licenses, NSPFOL-11A.00/2025 and EL-11A.00/2025, to a successor corporation of Nordion by amalgamation of the same name but with a different corporate number.

The transfer would result from a planned internal corporate reorganization whereby Nordion will be amalgamated with its direct parent company, 8921903 Canada, Inc. and two other non-licensee affiliated companies in a short-form vertical amalgamation following by a short-form horizontal amalgamation as set out in the attached diagrams. The resulting amalgamated corporation will also be named Nordion (Canada) Inc.. By operation of law, upon the completion of the amalgamations, the amalgamated corporation will assume the Licenses. This amalgamated corporation will be named Nordion (Canada) Inc., but will have a new corporate number. Importantly, the amalgamated corporation will have the same name, same address, same personnel, and the same ultimate owners as the existing Nordion.

The current pre-amalgamation organization structure of Nordion is reflected in the attached Figure 1. Figure 2 depicts the post-amalgamation organization structure. The amalgamations are planned to occur on January 1, 2019. The new corporate number will be assigned on that day.

Nordion respectfully requests that the CNSC review and approve this transfer request as promptly as possible and by no later than November 30, 2018. Once approval is received, Nordion will enact the proposed amalgamations and notify the CNSC of the status of the amalgamations. Nordion requests that the license transfers occur on January 1, 2019. This application is being made under subsection 24(2) of the Nuclear Safety and Control Act.

There will be no change to how the new Nordion amalgamated corporation manages any of the licensed activities. Mr. Kevin Brooks will remain as the applicant authority. Mr. Richard Wassenaar will remain as the signing authority. There will be no change to the management structure or management system documents. Nordion will continue to have the same equipment, facilities, personnel, and procedures needed to comply with all of its obligations under its Licenses to protect public health and safety. Current Nordion employees responsible for licensed materials and activities will continue to be responsible for such materials and activities after the completion of the reorganization. Accordingly, the new Nordion amalgamated corporation will remain technically qualified as the licensee and will continue to fulfill all responsibilities as the licensee. Care and control of all nuclear substances will remain with Nordion (Canada) Inc.

Nordion (Canada) Inc. confirms that:

- 1) The licensing and compliance obligations previously made to the Commission will be unchanged.
- 2) The financial guarantee will be unchanged
- 3) All other information submitted for the existing licences will be unchanged.

In summary, the proposed internal corporate reorganization and transfer of the Licenses will not be inimical to the common defense and security or result in any undue risk to public health and safety, and the transfer will be consistent with the requirements of the Nuclear Safety and Control Act and CNSC regulations.

If the CNSC has any questions about the proposed internal corporate reorganization described in this letter, or wishes to obtain any additional information about the transfer of the Licenses, please contact me at (613) 592-3400 ext. 2539.

Sincerely,



Richard Wassenaar
Director, Regulatory and EHS
Nordion (Canada) Inc.

Figures 1&2: Pre- and Post-Amalgamation Structures

cc:

K. Brooks – Nordion
M. Young – CNSC

S. Lacasse - Nordion
C. Ducros - CNSC

FIGURE 1: PRE-AMALGAMATION ORGANIZATION CHART

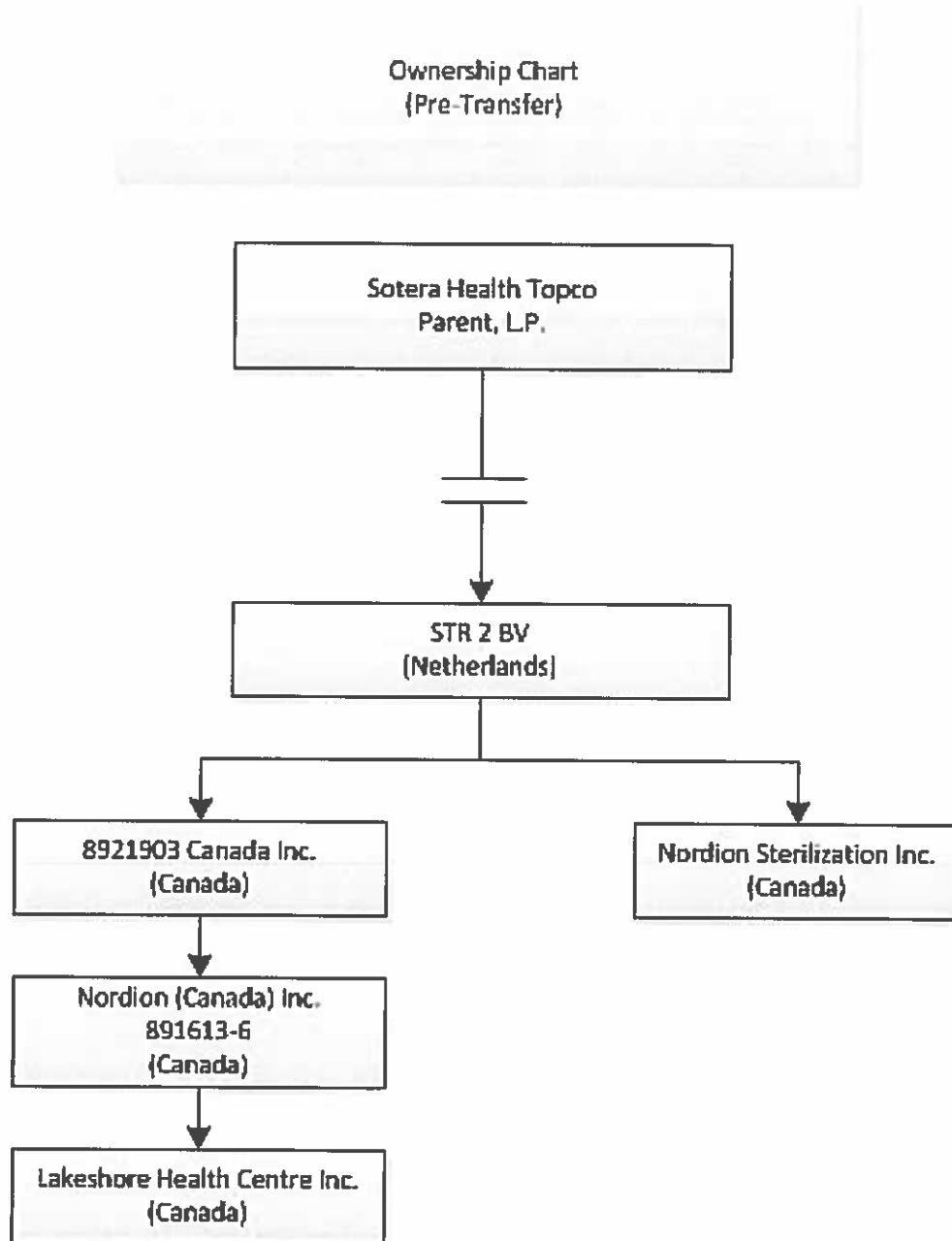
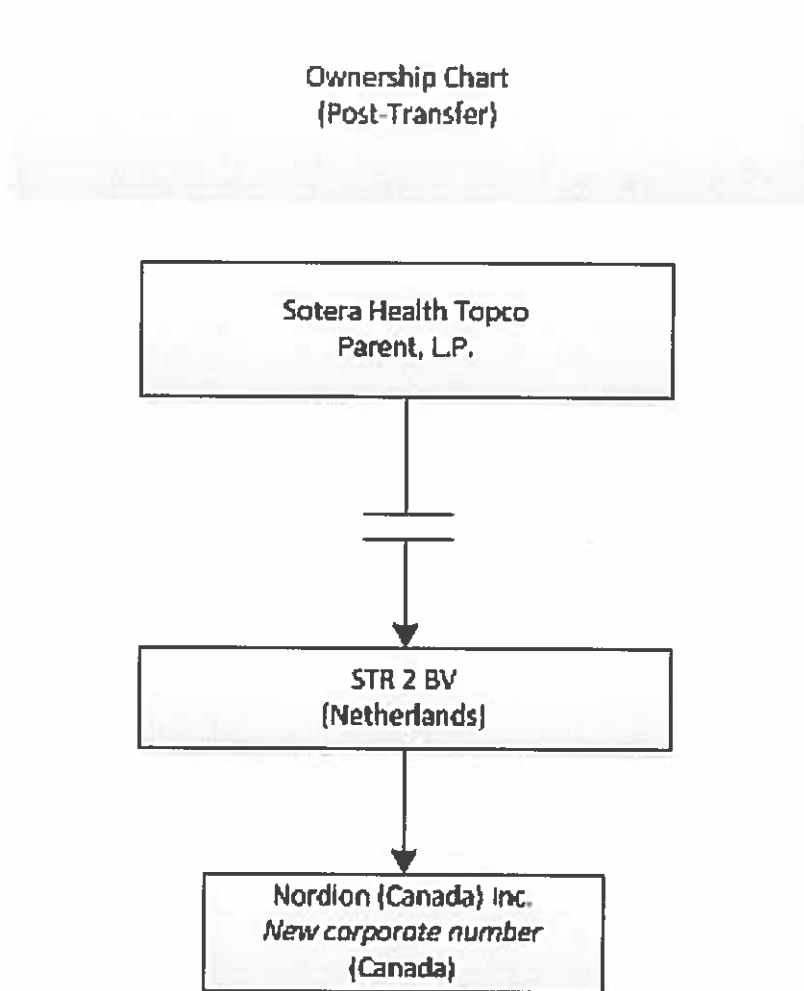


FIGURE 2: POST-AMALGAMATION ORGANIZATION CHART



Note: Additional companies between Sotera Health Topco Parent, L.P. and STR 2BV have been removed from the chart for simplicity. These companies are not directly involved in the amalgamations and remain unchanged pre- and post-amalgamations.