



**Written submission from the
Canadian Nuclear Isotope Council**

**Mémoire du Conseil canadien des
isotopes nucléaires**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

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**CANADIAN NUCLEAR
ISOTOPE COUNCIL**

January 6, 2020

**Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON
K1P 5S9**

Dear Senior Tribunal Officer, Secretariat,

On behalf of the Canadian Nuclear Isotope Council (CNIC) we are pleased to offer our support for BWXT Nuclear Energy Canada Inc. (BWXT NEC) to renew its Class IB fuel facility operating licence for a period of 10 years.

The Canadian Nuclear Isotope Council (CNIC) is an independent organization consisting of representatives from various levels within the Canadian health sector, nuclear industry and research bodies, convened specifically to advocate for our country's role in the production of the world's isotope supply. The CNIC serves as a voice in safeguarding the continued availability of isotopes, ensuring our public policies are risk-informed and science-based, and support the highest levels of public health and safety.

BWXT NEC, under its parent company, BWXT Canada Ltd., (BWXT Canada) was a founding member of the CNIC and continues to demonstrate its broader impact to the nuclear industry, including their recent contributions in the production of medical isotopes.

In Canada and around the world the need for medical isotopes used in modern diagnostic imaging is ever increasing and concerns about an adequate supply to diagnose heart disease and cancer, are also on the rise. BWXT Canada's work in this field through agreements with Ontario Power Generation (OPG) to produce Molybdenum-99 (Mo-99), demonstrated a critical step forward in ensuring that Canada would retain its leadership position of this globally critical isotope. To further support this technology BWXT also acquired Sotera Health's Nordion medical isotope business – a leading global manufacturer and supplier of critical medical isotopes and radiopharmaceuticals for research, diagnostic and therapeutic uses.

BWXT NEC's role in the development of this critical isotope includes the design and fabrication of the targets that comprise the first step in the process to produce Mo-99. BWXT NEC is also designing the target delivery system that will be used in the process of irradiating the targets at OPG.

Beyond its impact to the Canadian Isotope Sector and work with the CNIC, BWXT NEC has more than 60 years of extensive experience and innovation in the supply of nuclear fuel and reactor channel components, engineering support, and critical inspection and maintenance tooling for the CANDU® nuclear power industry. In all its years of operation BWXT NEC has continued to demonstrate leadership and a commitment to responsible & safe operations of its facilities; environmental stewardship a clear and dedicated committed to safety and continues to demonstrate progressive indigenous and community relations.



www.canadianisotopes.ca

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While demonstrating exceptional performance in all the above categories there are a few worth specifically mentioning. Canada's nuclear industry is among the most highly monitored and regulated industries in the world. BWXT NEC embodies excellence putting the health and safety of its workers as well as the health and safety of the surrounding communities in which it operates the highest priority. BWXT NEC also distributes, and posts to its website, community newsletters as a tool to share information with the local communities about the company's operational performance, health and safety, activities in the community and general information.

In regards to environmental protection BWXT NEC has a well-established and mature environmental monitoring program. A recent Environmental Risk Assessment (ERA) was completed and evaluated the potential expansion of conducting pelleting operations in Peterborough, currently done already at their Toronto location. The ERA revealed that no health or environmental impacts are expected as a result of BWXT NEC conducting pelleting operations and fuel bundle assembly at its Peterborough facility. BWXT's environmental management system considers all relevant legal requirements and has led to the establishment of programs to ensure the utmost compliance to relevant federal and provincial legislation.

BWXT NEC is also a critical component to the Ontario economy, supporting hundreds of jobs at both its Toronto and Peterborough facilities, helping to drive our economy forward.

For these reasons, the CNIC is happy to support BWXT NEC's application to renew its Class IB fuel facility operating licence. BWXT NEC is an integral part of the Ontario nuclear ecosystem, supporting jobs and prosperity while never sacrificing safety or environmental standards.

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Sincerely,
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