



**CMD 25-H6.10**

Date: 2025-04-26

**Written Submission from  
Women in Nuclear Canada**

**Mémoire de  
Women in Nuclear Canada**

In the matter of

À l'égard de

**Nordion (Canada) Inc.**

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Application to Renew Licence for the  
Nordion Facility

Demande pour le renouvellement de son  
permis pour l'installation de Nordion

**Commission Public Hearing**

**Audience publique de la Commission**

June 4, 2025

Le 4 juin 2025



## Reference 2025-H-06 Nordion Inc Facility Licence Renewal



Women in Nuclear Canada, established in 2004, represents over 6700 members across Canada. WiN-Canada goals are:

- To develop a dialogue with the public and with other women, to promote awareness around the factual contribution to people and society from nuclear technologies.
- To contribute to knowledge and experience exchange among members and chapters.
- To promote career interest in nuclear engineering, science, technology, the trades, and other nuclear-related professions, especially among women and young people. In our industry, made up of a little less than 20 percent women, our organization works to showcase the vital contribution women are making as leaders in the nuclear industry.

WiN-Canada believes that knowledge exchange between our members about all aspects of the industry provides them with the information necessary to help educate our family, friends and their communities. Women are strong opinion leaders in our country. Because of its efforts to promote the careers of women, WiN-Canada has become a strong, credible voice in the nuclear industry. It is important for our voice to be heard, including our support of all aspects of the nuclear industry, including renewal of Licence for the Nordion Inc to renew its Class 1B nuclear substance processing facility for period of 25 years, until October 31, 2050.

### **Supporting Renewal of License for Nordion Inc Class 1B facility**

Nordion is requesting a 25-year licence and believes such a licence period is justified for the reasons outlined below. Nordion has been safely operating the facility at 447 March Rd for over 50 years, producing Co-60 sealed sources since the 1960s. Over that time, Nordion has implemented and continuously improved the facility, equipment, and programs in place to protect the health and safety of people and the environment.

Given the importance of Co-60 to health care, and other sectors, a 25-year licence would provide long-term assurance of the stability of supply to the health care industry, including the return of disused sources from customers for proper end-of-life management. A 25-year licence would also provide increased confidence for Nordion in planning for long term investments in the facility. Recently, Nordion has invested millions in facility infrastructure, such as a new hot cell to support recycling efforts. Also, Nordion is investing heavily in new supplies of Co-60 from partners such as Darlington Nuclear



Generating Station. Nordion has been producing Co-60 sources for over 50 years and expects that to continue in the decades to come. A 25-year licence would support the long-term commitment Nordion has to health care critical Co-60 supply. In addition, Nordion has implemented a robust Co-60 recycling program. Since 2018, more than 99% of returned Co-60 has been recycled back into new sources. Recycling is a key pillar of Nordion end-of-life management program for sources. A 25-year licence would ensure that that program remains as a viable option for end-users.

## Environment

The environmental risk assessment shows that Nordion's operations do not negatively impact the surrounding community or environment. Nordion's production facilities have been designed and operated in a manner to prevent radioactive waste being released to municipal garbage or sewer systems and to ensure that releases to the environment via air or water emissions are within limits approved by the CNSC. Air and liquid release data since the last licence renewal in 2015 have been annually provided in Nordion's Annual Compliance Report (ACR). From these ACRs, Nordion's air and liquid effluent releases have been shown to be much less than 0.1% of the derived release limit (DRL) approved by the CNSC in Nordion License Conditions Handbook. All radioactive waste generated through production operations is collected and sent to licensed radioactive waste management facilities. This is not expected to substantially change over the requested 25-year licence period. 5) Nordion has shown a consistent and excellent history of operating experience and compliance in carrying out the licensed activity. Since 2015, the CNSC has conducted 25 inspections of Nordion's operations and programs.

## Indigenous Relations

The Nordion facility is situated in the unceded territories of the Algonquin Anishinaabe. There are several Indigenous Nations and groups that would have an interest in Nordion activities. Primarily, these are:

- The Algonquins of Pikwakanagan First Nation (AOPFN);
- The Kebaowek First Nation; and
- The Algonquins of Ontario (AOO).

Nordion is committed to engagement with Indigenous Nations.

In 2023, the Nordion Senior Leadership Team attended cultural awareness training with the AOPFN in their community. Also, in 2023, Nordion and BWXT Medical hosted a delegation from the AOPFN at the Nordion facility, providing a tour of the Nordion operations and starting discussions on engagement. In May 2024, Nordion began discussions with the AOPFN on an engagement plan. Those discussions





continue in 2025 and Nordion is working with the AOPFN to host an in-person discussion on Nordion's licence submission within the AOPFN community.

In August 2024, Nordion submitted formal notices of submission of the licence renewal application to the AOPFN, Kebaowek First Nation, AOO, the Metis Nation of Ontario, and the Kitigan Zibi Anishinabeg. The AOO reached out for further information. Introductory calls between Nordion and the AOO were held in August 2024 and February 2025 and Nordion is working to host members of the AOO for a site tour sometime in 2025. Nordion will continue to reach out to the Indigenous Nations over the period of the licence renewal.

It is essential for us to stress that WiN-Canada members are highly skilled workers and would not be working in the nuclear industry if we did not believe in the technology and its safety. It is important to all of us that when we leave for work in the morning, we know that we will return safely at the end of the day and that our families and friends who live in our communities will be safe every day. Due to our day-to-day interaction with the nuclear industry and our strong belief in the expertise of Nordion employees/contractors and their proven history of safe operation, WiN-Canada supports the Licence renewal application before the Commission.

