



Notice of Violation (Corporation)

Date of notice: October 13, 2026

AMP number: 2026-AMP-03

Violation committed by:	Amount of penalty:
Groupe ABS Inc.	\$34,660

Violation

Failure to ensure that the effective dose limit is not exceeded in violation of section 13 of the *Radiation Protection Regulations*.

Relevant facts

I, Nana-Owusua Kwamena, Acting Director General of the Directorate of Nuclear Substance Regulation and designated officer authorized by the Canadian Nuclear Safety Commission (CNSC) to issue notices of violations, believe on reasonable grounds that Groupe ABS Inc. committed the above violation. The facts relevant to the violation and the penalty calculation are as follows:

General facts

- Groupe ABS Inc. (hereinafter referred to as “the licensee”), whose head office is located at 17 rue de l’Industrie, Saint-Rémi, Quebec, holds CNSC licence No. 14315-1-30.0 for the possession, transfer, importation, use and storage of portable gauges.
- The licence does not limit the number of portable gauges that the licensee may possess, transfer or store. However, the licensee is required to meet regulatory requirements, which include ensuring that radiation doses are kept as low as reasonably achievable.
- All locations identified in this document are located in the province of Quebec and are sites where the licensee is authorized to carry on the activities authorized by the licence.



- Section 13 of the *Radiation Protection Regulations* (RPR) establishes the effective dose limit at 1 mSv per calendar year for a person who is not a nuclear energy worker (NEW).
- The licensee's radiation protection manual (Version 1.0, dated April 14, 2025), which is appended to the licence, sets out the radiation protection regulatory requirements to be met by the licensee. The manual contains the following sections:
 - Pages 12-13, RSO Responsibilities:
 - "[TRANSLATION] Key responsibilities include: [...]
 - g) Assessing personnel radiological exposure [...]
 - p) Verifying annually that radiation levels in the storage facility remain within acceptable limits"
 - Page 27, Storage:
 - "[TRANSLATION] Any normally occupied area adjacent to the storage facility must be surveyed using a radiation survey meter capable of measuring gamma and neutron radiation. These measurements must be documented. Radiation levels must not exceed 2.5 µSv/h, and measures must be in place to ensure that personnel exposure does not exceed the applicable annual dose limits set out in the *Radiation Protection Regulations*. Radiation levels must be verified and documented annually, and whenever there is a change in inventory, storage facility configuration or occupancy of rooms adjacent to the storage facility."

Compliance history

- In inspection report DC-14315-AN-220512-1, issued after the inspection conducted on May 12, 2022 [in the licensee's building located at 17 rue de l'Industrie] in Saint-Rémi, the inspector identified concerns regarding the dose rate at a workstation located near the storage facility. At the time of the inspection, there were 23 gauges being stored, and the estimated dose to the non-NEW individual at the workstation was 0.4 mSv/year (4 µSv (microSv)/h, based on an assumed occupancy of 1,000 hours per year).

Though that dose is below regulatory limits, as the inspector noted in the report, CNSC staff expect licensees to comply with section 4.1.2 of REGDOC-2.7.1, Radiation Protection, version 1.1:

"[TRANSLATION] The CNSC strongly recommends that the worker not exceed the number of hours specified for this workstation and/or work from another location. In accordance with CNSC recommendations (REGDOC 2.7.1, section 4.1.2) and the ALARA principle, members of the public, including non-nuclear energy workers, should not receive more than 50 µSv per year as a result of their professional duties."

The inspector did not require a response to this recommendation, and the licensee did not provide one.



- On December 4, 2025, during a routine inspection [in the licensee's building located at 891 Boulevard Charest West] in Quebec City, the inspector identified elevated dose rates in certain areas surrounding the storage room that could be problematic when occupancy factor(s) are taken into consideration. Inspection report D-14315-LP-251204-1 included a notice of non-compliance for failing to determine the dose received by each NEW and non-NEW individual as a result of the presence of stored gauges.
- In response to inspection report D-14315-LP-251204-1, the licensee hired a consultant to assess the dose rate around the storage area in Quebec City and the dose received by workers. The report (Rapport de visite & évaluation de l'exposition, localisation de Québec [Site Visit and Exposure Assessment Report, Quebec City]) was submitted to CNSC staff on January 18, 2026, and concluded that one non-NEW individual had received a dose exceeding the regulatory limit in 2024 and 2025 (Worker 1, Table 1 below).
- As part of the corrective actions required under inspection report D-14315-LP-251204-1, the inspector required the licensee to assess worker doses at all of its storage facilities. The resulting dose assessment reports were submitted to the CNSC by the licensee on February 12, 2026. The reports contained a number of inconsistencies that made them difficult for CNSC staff to assess (e.g., missing methodology, inconsistent or missing units for dose rate measurements).
- In the dose assessment report for the Montreal location, the licensee identified one non-NEW individual who had received an estimated annual dose exceeding the regulatory limit.
- Two CNSC inspectors conducted reactive inspections in four locations (Montreal, Blainville, Saint-Rémi and Longueuil) on February 19, 2026. The Montreal and Saint-Rémi inspections raised serious concerns regarding the dose received by non-NEW individuals and failure to meet the requirement to maintain worker doses as low as reasonably achievable.

As a result, Order No. OR-14315-LP-260224-1 was issued, requiring the licensee to immediately restrict occupancy at certain workstations in order to minimize exposure at specific offices and workstations. In addition, the licensee must determine the effective dose received by each individual who worked at these workstations and take measures to ensure that the dose resulting from radiation devices stored at its Montreal and Saint-Rémi sites is maintained at the lowest level reasonably achievable. The order remains in effect until the CNSC is satisfied that the licensee has returned to compliance with regulatory requirements.

- On May 25, 2026, the licensee confirmed dose estimates for individuals who had worked near the stored gauges at the Montreal and Saint-Rémi sites. The estimates showed that two non-NEW individuals had received doses exceeding the regulatory limit in 2025 (workers 2 and 3, Table 1). Two other individuals working in Montreal and Saint-Rémi, respectively, who are also non-NEW individuals, had received doses exceeding the regulatory limit in 2024 (workers 3 and 4, Table 1).



Table 1: Summary of the estimated dose received by individuals as a result of the presence of stored gauges

	Estimated effective dose (2024)	Estimated effective dose (2025)	Location
Worker 1 (non NEW)	2.149 mSv	1.892 mSv	Quebec City
Worker 2 (non NEW)	0.967 mSv	1.088 mSv	Montreal
Worker 3 (non NEW)	2.672 mSv	2.338 mSv	Montreal
Worker 4 (non NEW)	1.243 mSv	0.753 mSv	Saint-Rémi

- The licensee confirmed three dose limit exceedances in 2025. The violation therefore occurred on three occasions in 2025. However, I have not applied a daily penalty, as I consider the amount of the AMP to be sufficient to encourage compliance.
- Violation of the *Radiation Protection Regulations* is designated as a Category C violation under Part 3 of the Schedule to the *Administrative Monetary Penalties Regulations (Canadian Nuclear Safety Commission)* (the Regulations). Pursuant to section 4 of the Regulations, this violation is subject to an administrative monetary penalty ranging from \$1,000 to \$100,000 in the case of a person other than an individual (i.e. a corporation).

Based on my review of this matter, I am of the opinion that an administrative monetary penalty will deter recurrence of the above violation and promote future compliance with CNSC regulatory requirements. In consideration of the seven factors in section 5 of the Administrative Monetary Penalties Regulations (Canadian Nuclear Safety Commission), the amount of the penalty was determined based on the following relevant facts:

1. Compliance history: Assessed score = +2

A score of +2 has been assessed because the licensee has a history of dose limit exceedance for non-NEW individuals.



In addition to the three effective dose limit exceedances in 2025, the licensee confirmed that three non-NEW individuals, working at three different locations, also received doses exceeding the regulatory limit in 2024 (workers 1, 3 and 4, Table 1).

In addition to a history of non-compliance directly related to the violation, the licensee has demonstrated non-compliance in other safety and control areas (SCAs). Over the past 12 months, the licensee received a rating of “Below Expectations” in the Security and Operating Performance SCAs.

2. Intention or negligence: Assessed score = +4

A score of +4 has been assessed because the licensee demonstrated a very high degree of negligence in committing this violation.

The licensee has significantly expanded its operations in recent years and, as a result, acquired numerous additional gauges and established new locations. Two of the sites where overexposures were identified (Montreal and Saint-Rémi) were operating well beyond their identified storage capacity. Groupe ABS failed to meet its regulatory obligations by increasing the number of gauges at these two sites without implementing additional measures to ensure compliance with the ALARA principle.

As evidenced by the licensee’s radiation protection manual, as well as observations and requests made by CNSC inspectors on several occasions, the licensee was aware of its obligation to ensure that regulatory effective dose limits were not exceeded.

3. Actual or potential harm: Assessed score = +2

A score of +2 has been assessed, because CNSC inspections and analysis of information provided by the licensee demonstrated that three (3) non-NEW individuals received a dose exceeding the regulatory limit of 1 mSv/year. The dose received by the workers posed a minor risk, as it was not sufficient to cause measurable adverse health effects. However, there remains a potential for harm if worker doses are not accurately monitored.

4. Competitive or economic benefit: Assessed score = +1

A score of +1 has been assessed, because the licensee derived an economic benefit by failing to ensure that doses to non-NEW individuals remained below regulatory dose limits. There is a cost associated with hiring a consultant to determine the doses received by workers. The licensee derived an economic benefit by not completing, or by delaying, these dose assessments for workers at its various locations.

5. Efforts to mitigate or reverse effects: Assessed score = 0



A score of 0 has been assessed, because mitigation measures have been and continue to be taken, but they are not sufficient to mitigate the effects of the non-compliance.

In response to Order No. OR-14315-LP-260224-1, the licensee proposed modifications to the Montreal and Saint-Rémi sites to increase shielding and address the safety concerns. To date, the work has not been completed, and CNSC staff are awaiting submission of the final report and updated dose rate measurements for the areas surrounding the storage rooms. The order remains in effect until the CNSC is satisfied that the licensee has returned to compliance with regulatory requirements.

6. Assistance to Commission: Assessed score = +1

The licensee provided the information requested in response to the notices of non-compliance issued following the inspections. However, in the case of the dose assessment reports submitted for all storage locations in response to inspection report D-14315-LP-251204-1, the information provided was often inadequate or incomplete and required additional follow-up by CNSC staff.

7. Attention of Commission: Assessed score = 0

A score of 0 has been assessed, because the violation was identified as a result of inspections performed by CNSC staff. The violation was not identified by the licensee.





Penalty calculation

(See *Administrative Monetary Penalties Regulations (Canadian Nuclear Safety Commission)* SOR/2013-139)

(a) Category of violation

Category A ☐Category B ☐Category C ☒

(b) Penalty range

Category	Minimum	Maximum	Maximum - Minimum
A	\$1,000	\$12,000	\$11,000
B	\$1,000	\$40,000	\$39,000
C	\$1,000	\$100,000	\$99,000

(c) Determining factors

Factors	Scale of regulatory significance	Assessed score
1. Compliance history	0 ☐ +1 ☐ +2 ☒ +3 ☐ +4 ☐ +5 ☐	+2
2. Intention or negligence	0 ☐ +1 ☐ +2 ☐ +3 ☐ +4 ☒ +5 ☐	+4
3. Actual or potential harm	0 ☐ +1 ☐ +2 ☒ +3 ☐ +4 ☐ +5 ☐	+2
4. Competitive or economic benefit	0 ☐ +1 ☒ +2 ☐ +3 ☐ +4 ☐ +5 ☐	+1
5. Efforts to mitigate or reverse effects	-2 ☐ -1 ☐ 0 ☒ +1 ☐ +2 ☐ +3 ☐	0
6. Assistance to Commission	-2 ☐ -1 ☐ 0 ☐ +1 ☒ +2 ☐ +3 ☐	+1
7. Attention of Commission	-2 ☐ -1 ☐ 0 ☒ +1 ☐ +2 ☐ +3 ☐	0
Total		+10
÷ 29 ⁽¹⁾ [rounded to 2 decimal points]=		0.34
X 99000		
[total] =		33,660
+ \$1000 [minimum for the category] =		34,660

⁽¹⁾29 being the maximum value of regulatory significance



Issued by
**Kwamena,
NanaOwusua**

Digitally signed by Kwamena,
NanaOwusua
Date: 2026.10.13 13:14:44 -04'00'

Nana-Owusua Kwamena
Designated Officer

Date

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To request a review

As a person subject to an administrative monetary penalty, you have the right to request a review of the amount of the penalty or the facts of the violation, or both. Your request must be made in writing indicating the reasons why you are requesting a review and providing supporting information.

If you choose to request a review, you must do so in writing by November 12, 2026, to:

Canadian Nuclear Safety Commission
c/o Candace Salmon
Commission Registrar
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

Fax: (613) 995-5086
Telephone: (343) 630-3471
Email: registry-greffe@cnsccsn.gc.ca

Payment

You may pay this administrative monetary penalty by sending a cheque to:

Receiver General for Canada
c/o Canadian Nuclear Safety Commission
Finance Division
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

For other payment methods and further instructions, please refer to the attached notice of payment due.

Should you neither pay the penalty nor exercise your right to a review, you will be considered as having committed the violation and will be liable to the penalty set out herein.