



**Written submission from
SRB Technologies (Canada) Inc.**

**Mémoire de
SRB Technologies (Canada) Inc.**

In the Matter of

À l'égard de

**Application from SRB Technologies
(Canada) Inc. requesting acceptance of a
revised preliminary decommissioning plan
and a revised financial guarantee for the
SRBT tritium processing facility in
Pembroke, Ontario**

**Demande de SRB Technologies (Canada) Inc.
visant à obtenir l'approbation de la
Commission pour son plan préliminaire de
déclassement révisé et sa garantie financière
révisée visant son installation de traitement du
tritium à Pembroke (Ontario)**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

October 2020

Octobre 2020



SRB TECHNOLOGIES (CANADA) INC.

320-140 Boundary Road
Pembroke, Ontario, Canada, K8A 6W5
Tel.: (613) 732-0055
Fax: (613) 732-0056
E-Mail: sales@betalight.com
Web: www.betalight.com

Mr. Lester Posada
Project Officer, Nuclear Processing Facilities Division
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario
Canada
K1P 5S9

Subject: SRBT Submission of Revised Preliminary Decommissioning Plan - 2019

Dear Mr. Posada,

In accordance with the provisions of our Licence Conditions Handbook, we are pleased to submit the following document for regulatory review and acceptance:

- Preliminary Decommissioning Plan, November 2019

This licensing basis document is listed in Appendix C of our Licence Conditions Handbook (LCH) as requiring written notification of any change 30 days in advance of implementation.

As well, the LCH Section 12.2, Compliance Verification Criterion #3 requires SRBT to revise the Preliminary Decommissioning Plan (PDP) at a minimum every five years, unless specified otherwise by the Commission. This submission is intended to comply with this requirement, as the last version of the PDP was put in place in November 2014.

Section 1.2 of the LCH provides compliance verification criteria (CVC) on meeting condition 1.2 of the licence in regards to written notification on program changes referred to in the licensing basis.

In line with CVC #3, we provide the following:

Description of Changes:

- A listing of the key changes incorporated into the 2019 version of the PDP is appended to this letter.

Summary Explanation of How the Changed Document Remains Within the Licensing Basis:

- The PDP continues to take into consideration the guidance provided in CSA standard N294, *Decommissioning of Facilities Containing Nuclear Substances*.

- The revised PDP incorporates changes to the facility since the last version of the PDP was accepted by the Commission. This includes the facility expansion, new equipment and the removal and replacement of legacy equipment.
- The revised PDP also considers the evolution of the SRBT Management System over the past five years, as well as changes in the way that very low-level / clearance-level waste streams are managed under the Waste Management Program.

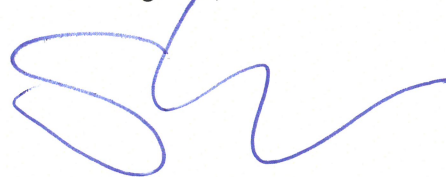
We request that CNSC staff accept the revised PDP as part of the licensing basis of our facility.

Once the 2019 PDP has been accepted, SRBT will work with CNSC staff to ensure that the required Financial Guarantee (FG) is funded at a rate that is acceptable and reasonable. As of October 31, 2019, the margin between the value of the current FG held in escrow (\$699,187.65), and the postulated cost estimate of PDP 2019 (\$727,327) stands at \$28,139.35.

Contingent on the acceptance of the PDP and associated cost estimate, SRBT expects to have the FG fully funded to the revised cost estimate well in advance of submitting our application for renewal of our nuclear facility operating licence in 2021.

Please don't hesitate to contact me should you have any questions or require clarification.

Best Regards,



Stephane Levesque
President
SRB Technologies (Canada) Inc.

cc: C. Ducros, CNSC
R. Fitzpatrick, SRBT
K. Levesque, SRBT
J. MacDonald, SRBT

Enclosures:

[1] Preliminary Decommissioning Plan, November 2019

APPENDIX - LIST OF KEY CHANGES TO PDP

1. Added reference to the 2014 PDP acceptance in the 'Background' section.
2. Italicized all regulations, standards, in-house programs and regulatory documents in lieu of reference.
3. Updated floor space and floor plan figure to include molding / machining area.
4. Synchronized information on site location with SAR for consistency.
5. Updated scint counter specs.
6. Added a table on labour costs, and adjusted labour rates to account for five-year inflation.
7. Added specific reference to clearance-level waste limits in 8.3.
8. Updated RP action levels in Table 7, and EP action level in Table 8.
9. Updates throughout Section 8 to align with current management system.
10. Updated LLW rate per unit volume to \$28,000 per m³.
11. Added concept of CLW and associated mass expected throughout work packages.
12. Introduced recycling as a potential management strategy during decommissioning phase.
13. Reduced number of lasers to 2 (LMI dismantlement completed in 2019).
14. Updated description of Rig Room fume hoods (old hoods replaced with stainless steel models in 2019).
15. Removed reference to reclaim (dismantlement completed in 2019).
16. Updated aerial photographs of facility.
17. Other improvements and corrections in work packages where needed.
18. Updated total cost estimate (table 43) and current funding level as of October 2019.
19. Updated references to include latest approved FG and Escrow agreements.
20. Updated Appendices A and B.

The **Preliminary Decommissioning Plan - November 2019** can be found on SRBT's website.

(<http://srbt.com/SRBT%20Preliminary%20Decommissioning%20Plan%20-%20November%202019.pdf>)