



**Written submission from  
Kinectrics**

**Mémoire de  
Kinectrics**

In the Matter of the

À l'égard de

**BWXT Medical Ltd.**

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Application for a Class IB nuclear substance  
processing facility operating licence

Demande pour un permis d'exploitation d'une  
installation de traitement de substances  
nucléaires de catégorie IB

**Commission Public Hearing**

**Audience publique de la Commission**

**June 9, 2021**

**9 juin 2021**



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

**Commission Public Hearing, BWXT Medical Ltd Class 1B Licence Application Ref. 2021-H-05**

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' support for BWXT Medical's (formally BWXT ITG Canada Inc.) application for a Class IB nuclear substance processing facility operating licence to allow BWXT Medical to operate the existing medical isotope facility located within their nuclear processing facility in Kanata, Ontario.

Kinectrics is a proudly Canadian company, committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope productions. Our headquarters are in Etobicoke, Ontario with offices in Pickering, downtown Toronto, Bruce County, the United States, Germany, Denmark, Romania, United Kingdom and India. We have over 30 laboratories including CNSC licensed facilities and employ more than 1,200 staff, 70% of whom have technical, science or engineering degrees.

At Kinectrics, we invest in state-of-the-art facilities and tools to provide the best and most comprehensive services to our customers. Our laboratories provide testing facilities for a broad range of areas in support of the nuclear industry, including materials analysis, nuclear radiation safety, and chemical analysis. Our world-class experts deliver services including project management and controls, design engineering and nuclear safety analysis and licensing. In addition to supporting BWXT in these areas, we provide similar services to OPG, Bruce Power, Hydro One, other provincial and local utilities, and over 200 clients elsewhere in North America, Europe, the Middle East and Asia. We also provide the broader electricity industry with electrical transformer testing and renewable energy grid interconnection.



Kinectrics has made significant investments in the production of medical isotopes and we share BWXT's vision of the importance of providing diagnostic and therapeutic medical isotopes and radiopharmaceuticals. These products are relied upon across the world to treat and diagnose patients with serious diseases. Kinectrics believes that it is important to continue to invest in Canadian facilities and technologies that leverage our long history in medical isotope production, that can maintain our prominence in isotope production and processing and reverse the trend of the industry locating their manufacturing outside of Canada. Akin to what has been recently observed for vaccine manufacturing, maintaining a Canadian footprint for medical isotope production is important for protecting the health of our citizens.

As a service provider, Kinectrics has provided design and licensing services to BWXT, and has also done work in support of the Kanata facility. In providing these services, Kinectrics staff interface with the highly competent and professional team at BWXT and we can confirm they are committed to safety, quality, and technical excellence.

Processes and programs are in place to ensure the BWXT organization fosters a healthy safety culture and continually monitors and improves its performance. Continuous improvement programs at BWXT Medical ensure high safety standards are maintained. BWXT's dose to nuclear energy workers and the public as well as its discharges to the environment have consistently been well below regulatory dose limits.

Kinectrics participates with BWXT in industry forums such as the CANDU Owners Group supplier participant program. In 2014 BWXT challenged COG to enhance its program by providing opportunities to suppliers similar to those available to utility operators, particularly in regard to leadership training. As a result, Kinectrics staff have had the opportunity to attend Front Line Manager training with other nuclear suppliers including BWXT.

Kinectrics is a proud member of the Canadian Council for Aboriginal Business (CCAB), which aims to strengthen the relationship between Aboriginal and non-Aboriginal peoples, businesses, and communities. In this regard, we are pleased to work with BWXT, which is also a member of the CCAB since 2017 and has demonstrated a strong commitment to Aboriginal communities. BWXT is committed to having a positive relationship with Indigenous groups and communities and developing strategies in several areas including employment, economic development, education, training and community sponsorships. Today, BWXT is Progressive Aboriginal Relations (PAR) committed and has implemented a Canada-wide Indigenous Policy and are actively working through the program's criteria to become certified in PAR.

In summary, by working closely with BWXT and understanding their principles and safety culture, combined with our personal interaction at all levels from technical staff to executives, we are confident BWXT Medical is capable of manufacturing and supplying critical medical isotopes and radiopharmaceuticals safely and reliably from its Kanata operations.



On this basis we support BWXT's application for a Class IB nuclear substance processing facility operating licence to allow BWXT Medical to operate the existing medical isotope facility located within their nuclear processing facility in Kanata, Ontario.

If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or [david.harris@kinectrics.com](mailto:david.harris@kinectrics.com).

Sincerely,

David Harris  
President and CEO  
Kinectrics Inc