



**CMD 25-H6.9**

Date: 2025-04-27

**Written Submission from  
BWXT Medical Ltd.**

**Mémoire de  
BWXT Medical Ltd.**

In the matter of

À l'égard de

**Nordion (Canada) Inc.**

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**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



Canadian Nuclear Safety Commission  
280 Slater Street  
PO Box 1046, Station B  
Ottawa, ON K1P 5S9  
Canada

Addressed to: Commission Registry

RE: BWXT Medical's Intervention in Support of Nordion's Application to renew Operating Licence  
NSPFOL-11A.01/2025

BWXT Medical is a respected supplier of nuclear medicine products used for the prevention, diagnosis and treatment of disease for the lives of millions of people in many countries around the world. Our products are used daily by pharmaceutical and biotechnology companies, medical-device manufacturers, hospitals, clinics and research laboratories. The scope of the manufacturing and product development activities at our site for medical isotopes includes: active pharmaceutical ingredients, finished pharmaceuticals, medical devices and contract manufacturing.

Following the acquisition of the medical isotope business from Nordion in 2018, BWXT Medical has leased the Nuclear Medicine Production Facility (NMPF), a facility that is comprised of a portion of the Kanata Operations Building (KOB) and the entire Kanata Radiopharmaceutical Manufacturing Facility (KRMF), both located on Nordion property situated on 447 March Road, Kanata, ON.

BWXT Medical fully supports Nordion's application for renewal of its Operating License NSPFOL-11A.01/2025 for a period of 25 years. With its manufacturing of cobalt-60 sealed sources beginning in the 1960's, Nordion has a proven track record of safe operation for over 50 years, with demonstrable efforts to continuously improve its safety and security programs. As is well described in its licence renewal application and supporting documentation, Nordion continues to address all Safety and Control Areas (SCAs) by implementing robust programs that are both compliant and effective in protecting the health of workers, members of the public and the environment. This includes, among others, the Conventional Health and Safety Program, Radiation Protection Program, Environmental Protection Program, Emergency Preparedness Program and the Waste Management Program. Furthermore, Nordion continues to augment its Public Information and Disclosure Program and grow meaningful relationships with Indigenous rights holders.

In 2021, BWXT Medical was granted a Class IB Nuclear Substance Processing Facility Licence. Since that time the nuclear facility at 447 March Road in Kanata became unique, having two Class IB licensees with very similar licence requirements operating on the same site. As a result of this unique licensing structure, a Joint Nordion/BWXT Medical EHS Committee was created to monitor the implementation of programs and procedures that could impact the environment, health or safety on or around the site. Any major change to the facility or operations is reviewed and site-wide safety performance data is closely monitored. This joint committee provides supplemental oversight, one that is unique to this facility and further supports Nordion's application for a 25-year licence renewal.

BWXT Medical's vision is to be the most relied-upon nuclear medicine company in the world; developing, manufacturing and delivering products for diagnostic imaging and radiotherapeutic treatments that improve patient outcomes worldwide. Nordion's mission is also patient-focused, to reliably manufacture cobalt-60 sealed sources used to sterilize medical devices and to diagnose and treat disease through a wide range of procedures. A 25-year licence would provide stability in the supply chain, a benefit that would be invaluable to the health sector.

Based on our first-hand knowledge and experience of working alongside them since 2018, we are fully confident that Nordion is capable and committed to meeting all regulatory requirements for the proposed licensed activities for the duration of the requested 25-year licence period.

We appreciate the opportunity to share our thoughts on the Nordion licence renewal application as part of the intervention process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mahilrajan', written in a cursive style.

Tim Mahilrajan  
Director, Nuclear Regulatory & EHS  
BWXT Medical Ltd.