



## **Supplementary Information**

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

In the Matter of

**SRB Technologies (Canada) Inc.**

---

Application to renew the Nuclear Substance Processing Facility Operating Licence for SRB Technologies (Canada) Inc.

Commission Public Hearing

**May 14, 2015**

## **Renseignements supplémentaires**

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

À l'égard de

**SRB Technologies (Canada) Inc.**

---

Demande concernant le renouvellement du permis d'exploitation d'une installation de traitement de substances nucléaires pour SRB Technologies (Canada) Inc.

Audience publique de la Commission

**Le 14 mai 2015**





**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](mailto:sales@betalight.com)  
Web: [www.betalight.com](http://www.betalight.com)

**SRB TECHNOLOGIES (CANADA) INC.**

Supplemental Written Submission  
For  
Hearing

In Support Of Application To Renew  
Nuclear Substance Processing Facility Operating Licence  
For A Period Of Ten Years

A handwritten signature in black ink, appearing to read "J MacDonald", written over a horizontal line.

Prepared by:  
Jamie MacDonald  
Manager – Health Physics and Regulatory Affairs

A handwritten signature in black ink, appearing to read "Ross Fitzpatrick", written over a horizontal line.

Reviewed by:  
Ross Fitzpatrick  
Vice-President

A handwritten signature in black ink, appearing to read "Stephane Levesque", written over a horizontal line.

Approved by:  
Stephane Levesque  
President

# **TABLE OF CONTENTS**

<b>DESCRIPTION</b>	<b>PAGE</b>
1. INTRODUCTION.....	1
3.12 Emergency Management And Fire Protection.....	2
3.12.2 Emergency Preparedness.....	2
3.12.2.3 Emergency Exercise Report.....	2
4.1 Public Information Program.....	3
4.1.8 Mass Mailing.....	3
4.1.9 Door to Door Campaigns.....	3
4.1.10 Meeting with local interest groups.....	4
4.1.11 Facility tour with local interest groups.....	5
4.1.12 New Members of Public Information Committee.....	5
4.1.13 Recent Public Inquiries.....	6
4.1.14 Recent Plant Tours.....	6
4.1.15 Presentation to Pembroke City Council.....	7
5.0 REFERENCES.....	8

## LIST OF TABLES

NUMBER	TITLE	PAGE
Table 19	.....Recent Public Inquiries.....	6



## **1. INTRODUCTION**

Following SRBT's Written Submission<sup>[47]</sup> the CNSC announced participant funding for those wishing to express comments regarding SRBT's licence renewal. As a result, a number of comments and feedback have been expressed by members of the public who have been approved by participant funding. SRBT has subsequently undertaken a number of public information initiatives which it felt was important to update the Commission in this Supplementary Written Submission.

SRBT also completed an internal report<sup>[48]</sup> on the Emergency Exercise, conducted on February 9, 2015 which has been submitted to CNSC Staff on April 8, 2015. SRBT also felt it was important to update the Commission on this matter in this Supplementary Written Submission.

*Note: In line with the guiding principles for CMD preparation as described in CNSC guidance document GD-379, Guide for Applicants and Intervenors Writing CNSC Commission Member Documents the section, table and reference numbering of this Supplemental Written Submission is in sequence with the original Written Submission dated March 13, 2015 in order to ensure continuity and for ease of reference during the Hearing.*

## **3.12 Emergency Management And Fire Protection**

### **3.12.2 Emergency Preparedness**

#### **3.12.2.3 Emergency Exercise Report**

On April 8, 2015, SRBT provided CNSC staff with a copy of our internal report<sup>[48]</sup> on the Emergency Exercise, conducted on February 9, 2015. The report was also posted on our web site.

CNSC staff provided SRBT a report<sup>[49]</sup> of their observations from the exercise as well, wherein it was concluded that SRBT remains in compliance with all regulatory requirements with respect to Emergency Preparedness. An additional six recommendations were provided by CNSC Staff, which SRBT will incorporate into their revised Emergency Preparedness program.

Several key actions have already been completed since the final report<sup>[48]</sup> was issued:

- New hand-held two-way radios were purchased and are now available for use during an emergency scenario,
- Critical documents and checklists are now available at building exit points for use during emergencies,
- Two first aid kits were purchased and placed at the main building exit points for use in emergency situations,
- New secure cabinets were procured and installed to minimize the potential for light source damage during fire suppression activities by emergency responders, and
- A facility exit was modified to ensure building security during emergency situations.

All of the opportunities for improvement items raised in our internal report<sup>[48]</sup> are being tracked using the SRBT Non-Conformance Report (NCR) process. The improvement plan is scheduled for completion by September 30, 2015.



## **4.1 Public Information Program**

### **4.1.8 Mass Mailing**

Before March 31<sup>st</sup> of each year an update of our information pamphlet is developed and posted on our website. This information pamphlet is a two page document which introduces the company to members of the public and provides information on risks associated with emissions of the facility as well as providing clear contact information for any individual to acquire more detailed information.

During the week of April 7, 2015, a mass mailing of 10,000 of SRBT's updated information pamphlets<sup>[50]</sup> were sent by Canada Post to all residences of the City of Pembroke and Laurentian Valley.

Following this mailing, SRBT received one e-mail on April 19, 2015 from an individual who had expressed concerns in the past. This individual thanked SRBT for sending the pamphlet<sup>[50]</sup> and requested information on emissions, tritium, dose and monitoring wells.

On April 21, 2015, SRBT responded by e-mail thanking this individual for their feedback, stated a response is being prepared and in the meantime offered to provide a tour of the facility.

### **4.1.9 Door to Door Campaigns**

On March 18 and 19, 2015, two SRBT representatives campaigned door to door to 215 local residences and businesses around the SRBT facility, within approximately 500 meters of the facility. Each resident or business was given an updated SRBT information pamphlet<sup>[50]</sup>. SRBT was successful in conducting a one on one discussion with 57 individuals.

The following is the outcome of the discussions with those 57 individuals:

- The majority of individuals that SRBT staff spoke with indicated they were familiar with the SRBT facility. Four individuals inquired on the operations that take place at SRBT. SRBT staff provided the information.
- No concerns or issues were raised regarding the upcoming SRBT licence renewal for a 10 year period.
- A tour of the facility was offered to all 57 individuals, only one individual showed interest. On March 27, 2015 this individual along with his neighbor was provided a tour of the SRBT facility. The outcome of the tour was very positive. One of these individuals submitted to CNSC a written submission in favor of SRBT licence renewal.
- Some individuals indicated that they had been solicited via telephone from an "unknown individual" stating they should be concerned with the upcoming licence renewal of SRBT for a 10 year period. This "unknown individual" has also stated they should be concerned consuming vegetation grown at their residence. The residents indicated they had no concerns regarding the SRBT facility.
- One individual informed SRBT staff that he was told that he could not grow a garden in his backyard due to the proximity of his residence to the SRBT facility. SRBT representatives informed the individual that it was safe to have a garden.

On April 28, 2015, two SRBT representatives campaigned a second door to door to 154 residences in three different residential areas all within approximately four kilometers of the facility. From the mass mailing conducted throughout the week of April 7, 2015 all 154 residences already received an updated pamphlet<sup>[50]</sup> but each was given an additional pamphlet<sup>[50]</sup>. SRBT was successful in conducting a one on one discussion with 19 individuals.

The following is the outcome of the discussions with those 19 individuals:

- No concerns or issues were raised regarding the upcoming SRBT licence renewal for a 10 year period.
- One individual inquired on the operations that take place at SRBT. SRBT staff provided the information.
- A tour of the facility was offered to all 19 individuals, no interest was expressed.

In conclusion a total of 369 residences and businesses throughout the City of Pembroke were solicited door to door with a total of 76 individuals being spoken to directly. SRBT was therefore successful in conducting a one on one discussion with 20.5% of residences and businesses solicited with the majority of the feedback being positive.

#### **4.1.10 Meeting with local interest groups**

On March 16, 2015 SRBT staff met with representatives from two local interest groups, Ms. Kelly O'Grady from the First Six Years and Mr. Ole Hendrickson from the Concerned Citizens of Renfrew County (CCRC) to discuss SRBT's licence renewal.

The meeting was held at a neutral location at the request of Ms. O'Grady. In attendance for SRBT were President Stephane Levesque, Vice-President Ross Fitzpatrick, Manager of Health Physics and Regulatory Affairs Jamie MacDonald and Executive Assistant Katie Levesque who took minutes<sup>[51]</sup> for the meeting. Doug McNab, a consultant from D&J Consulting was also present. Several topics were discussed including:

- Jamie MacDonald and Doug McNab's past work experience with the CNSC
- SRBT's Emergency Training Exercise which took place on February 9, 2015.
- Action level exceedance which occurred during the week of October 28 to November 4, 2014.
- Calculation of SRBT's public dose
- If garden sampling is still being done, confirmed it is and stated CNSC staff take duplicate samples as well.
- New Import/Export Manager.
- SRBT's products, operations, staff increase and production increase.
- Filling rigs including the quantity of filling cycles each month.
- Pyrophoric Uranium Tritium Traps (PUTTs)
- Decommissioning of Shield Source Inc. (SSI)
- SRBT's ventilation system

#### **4.1.11 Facility tour with local interest groups**

On March 16, 2015 following the above meeting, Ms. O'Grady and Mr. Hendrickson were provided with a tour of the SRBT facility which lasted approximately 1.5 hours.

The tour encompassed all aspects of SRBT's production areas which includes the glass shop, the coating room, the rig room, the assembly room, the milling area and the shipping area. Also shown during the tour are the office areas and the liquid scintillation counting lab. The following are the keys points that were addressed during the tour:

- A safety briefing was provided as well as actions to take in the event of a fire alarm and/or tritium-in-air monitor alarm.
- Viewed various light shapes and types including spheres.
- Discussed several pieces of equipment such as, chart recorder, new digital data recorder, bubblers and real-time stack monitoring system, new Liquid Scintillation Machines and tritium-in-air monitors.
- When entering the rig room and assembly an explanation was given on the process of entering and exiting properly and what safety equipment is required.
- While in the rig room discussed the bulk splitting process, reclaim rig (showed it remains electrically and mechanically disconnected), fume hoods, filling rigs (additional discussions on the action level exceedance), Pyrophoric Uranium Tritium Traps (PUTT's), laser cutting process and the waste room. Also discussed the training of operators in the rig room.
- Explained how SRBT's products are used in safety applications where lighting is essential and the use of power, batteries and electricity is prohibited or not available.
- Explained SRBT's Dosimetry Service Licence and how yearly we successfully pass the Health Canada Intercomparison test.
- Ms. O'Grady asked SRBT to confirm that environmental sampling is being done. It was explained that a contracted independent third party performs the sampling of wells, passive air samplers, produce and precipitations samples, milk, wine and surface water.
- During the tour of the shipping area it was pointed out that SRBT installed an additional tritium-in-air monitor dedicated to the shipping area in order to provide immediate feedback in the case of a light leakage during packing.

Ms. O'Grady and Mr. Hendrickson both expressed reserved but positive comments regarding the tour and also noted the improvements that were made at the facility and to the organization.

#### **4.1.12 New Members of Public Information Committee**

During our meeting both Ms. O'Grady and Mr. Hendrickson were asked if they would be interested in becoming members of SRBT's Public Information Committee. They were informed that the Committee meets approximately once a quarter and meeting times could be flexible to suit their schedule. Mr. Hendrickson stated his appreciation but declined since he was already overcommitted and does not live locally and Ms. O'Grady stated she was interested and therefore will be contacted before the next scheduled meeting.

The former Mayor of Pembroke Ed Jacyno, who served Pembroke for 18 years including 3 terms as Mayor and 2 terms as Deputy Mayor is now employed by SRBT and is a member of the Committee. With his experience working with the community the former Mayor will add extensive experience in how to deal with the public.

**4.1.13 Recent Public Inquiries**

SRBT received only two inquiries from members of the public during the term of the existing licence up to the end of 2014.

Following SRBT's application for a ten year licence there have been several recent public inquiries for request for information. These inquiries have been made solely by Ms. Kelly O'Grady from the First Six Years and from Mr. Ole Hendrickson from the Concerned Citizens of Renfrew County (CCRC). The following table shows the name of the person inquiring, the date of the inquiry as well as the date of the reply and the number of days it took to reply.

**TABLE 19: RECENT PUBLIC INQUIRIES**

	DATE SENT	DATE REPLIED	# OF DAYS TO REPLY
Kelly O'Grady	January 20, 2015	January 23, 2015	3
Ole Hendrickson	March 9, 2015	March 13, 2015	4
Kelly O'Grady	March 17, 2015	March 22, 2015	5
Ole Hendrickson	March 19, 2015	March 22, 2015	3
Kelly O'Grady	March 22, 2015	March 22, 2015	0
Ole Hendrickson	March 23, 2015	March 25, 2015	2
Ole Hendrickson	March 23, 2015	April 1, 2015	9
Kelly O'Grady	April 8, 2015	April 10, 2015	2
Kelly O'Grady	May 1, 2015	May 5, 2015	4
<b>AVERAGE</b>			<b>3.6</b>

On average it took 3.6 days to reply to each inquiry with the most days being nine days due to the request that required the review of records that dated back to 2000.

**4.1.14 Recent Plant Tours**

To date in 2015 SRBT has provided a total of 28 plant tours to various members of the general public and local institutions. Plant tours have proven to be a useful tool for SRBT to reach the public. SRBT's continued goals are to be transparent, visible and open with our community, our regulators, and our staff.

#### **4.1.15 Presentation to Pembroke City Council**

Following the municipal elections SRBT wanted to provide the new Pembroke City Council members the opportunity to learn about the operations of SRBT and also to answer any questions or concerns.

On April 5, 2015, SRBT made a presentation to the new Pembroke City Council and provided information on product, licence application, inspections by CNSC and third parties, training, "Lessons Learned" from Shield Source Inc. (SSI), public and worker dose, air and liquid emissions, environmental monitoring results, emergency exercise, public interactions, SRBT's website, Financial Guarantee and SRBT's future outlook.

Two minor questions were asked regarding Waste Management and Environmental sampling both of which were addressed. A Councilor commented how little public concern had been expressed in the last several years regarding SRBT. The Deputy Mayor also referred to SRBT as being "Open and Transparent".

The presentation was covered by media and televised on Cogeco Cable. A copy of the presentation is also posted on our web site.

## **5.0 REFERENCES**

- [47] SRB Technologies (Canada) Inc., "Written Submission for Hearing", March 13, 2015.
- [48] SRB Technologies (Canada) Inc., "Emergency Exercise One Report", April 8, 2015.
- [49] Letter and attachment from J. Campbell (CNSC) to S. Levesque (SRBT), "Emergency Exercise Observation February 9, 2015", Report No. NPF-D-SRBT-2015-02-09, April 13, 2015.
- [50] SRB Technologies (Canada) Inc., "Pamphlet", Issue 28, March 25, 2015.
- [51] SRB Technologies (Canada) Inc., "Meeting Minutes", Public Information Committee, March 16, 2015.