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PUBLIC INFORMATION PROGRAM

Revision A

September 15, 2021

DOCUMENT REVIEW

Implementation Date	Reviewed By:	Revision Notes
June 20, 2006	Stephane Levesque	Revised to address comment (1) in April 7, 2006 letter from Ann Erdman of the CNSC.
January 7, 2008	Stephane Levesque Katie Belec	Revised program to address decisions made during public information committee meetings of December 3 and 27, 2007. Removed references to date of submission of pamphlet and brochure from sections 5.5, 5.7 and 5.10 as these have since been submitted and the date has long passed. Also removed copies of "Pembroke City Council resolutions", copies of "all media coverage for the last 5 years" and "survey" from appendices as information is dated and should not be included as part of program.
April 21, 2014	Stephane Levesque Katie Levesque	Revised program to reflect the reporting requirements of Canadian Nuclear Safety Commission Regulatory Document RD/GD-99.3 titled "Public Information and Disclosure".
July 31, 2014	Stephane Levesque Katie Levesque	Revised to address comments in CNSC Staff letter dated June 10, 2014 letter from Nadia Petseva to Stephane Levesque. Changes described in SRB letter to CNSC Staff dated July 14, 2014 from Stephane Levesque to Nadia Petseva.
September 25, 2015	Stephane Levesque Katie Levesque	Revised program to address OFI-114 received during an internal audit which stated "a review of section 8.8 to ensure accuracy as SRB does not have a "weekly emission administrative limit" Section 8.8 now states "any Regulatory Limit or Licence Limit exceedance"
September 15, 2021	Stephane Levesque Katie Levesque Ross Fitzpatrick	Revised program to reflect the reporting requirements of Canadian Nuclear Safety Commission Regulatory Document REGDOC-3.2.1 titled "Public and Aboriginal Engagement, Public Information and Disclosure" dated May 2018. Changes to reflect MSP-001 requirements, the previous revision dated September 25, 2015 was revision 9, therefore as we now have to use letters for revisions this new revision will be stated as revision A. Various changes for clarity, provide links to website and replacing term "Aboriginal" with "Indigenous". Section "5.0 Location" revised to be consistent with Environmental Risk Assessment (ERA). Section "7.0 Target Audience" revised to reflect specific Indigenous Groups. Section "9.2 Press Releases" revised and expanded to include reporting requirement to Indigenous Groups. Section "9.11 Social Media" revised to reflect all additional social media outlets. Section "9.12 Website" revised to reflect all additional information that is now being posted on the website. Section "12.0 Public Information Protocol" revised to reflect expanded scope.

PUBLIC INFORMATION PROGRAM

SRB Technologies (Canada) Inc. has presented this Public Information Program document to the following individuals for review and approval:

SRBT Management



President

Date: SEPTEMBER 15/21



Vice President

Date: Sept 15, 21



Executive Assistant

Date: Sept 15, 2021

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1.0 BACKGROUND

On January 7, 2008 SRB Technologies (Canada) Inc. (SRBT) submitted to the Canadian Nuclear Safety Commission (CNSC) Staff a Public Information Program^[1] in accordance with the Regulatory Guide G-217^[2] titled "Licensee Public Information Program" issued in January 2004.

In a letter^[3] dated February 29, 2008 CNSC Staff provided comment on the Public Information Program^[1] submitted by SRBT and indicated that CNSC Staff was satisfied that SRBT's enhanced Public Information Program (PIP) met the criteria found in Regulatory Guide G-217^[2] titled "Licensee Public Information Program" issued in January 2004.

In March 2012, the Canadian Nuclear Safety Commission published Regulatory Document RD/GD-99.3^[4] titled "Public Information and Disclosure" which replaced Regulatory Guide G-217^[2] titled "Licensee Public Information Programs" issued in January 2004.

In a letter^[5] dated July 11, 2012 CNSC Staff requested that going forward, SRBT's public information programs should follow the requirements of RD/GD-99.3^[4] titled "Public Information and Disclosure" issued in March 2012.

On April 21, 2014 SRBT submitted a revised Public Information Program^[6] to address the requirements of RD/GD-99.3^[4] titled "Public Information and Disclosure" issued in March 2012.

On June 10, 2014 CNSC Staff provided SRBT a letter^[7] with comments on the revised Public Information Program^[6]. In this letter^[7] CNSC Staff concluded that SRBT's program is striving to adhere to the criteria outlined in RD/GD-99.3^[4] but that some improvements needed to be made in order for the Program to be satisfactory.

On July 14, 2014 SRBT submitted a letter^[8] to CNSC Staff describing detailed actions proposed by SRBT to address CNSC Staff comments as outlined in their letter^[7] dated June 10, 2014.

In an e-mail^[9] dated July 17, 2014 CNSC Staff indicated that the actions proposed by SRBT in their letter^[8] of July 14, 2014 were acceptable.

On July 31, 2014 SRBT submitted a revised Public Information Program^[10] to address comments in CNSC Staff letter dated June 10, 2014 letter^[7] with the changes described in the SRBT letter to CNSC Staff dated July 14, 2014^[8].

On September 25, 2015 SRBT submitted a revised Public Information Program^[11] to address a minor error identified as an Opportunity for Improvement (*OFI-114*) during an internal audit.

On October 26, 2015 CNSC Staff provided SRBT a letter^[12] with comments on the revised Public Information Program^[11]. In this letter^[12] CNSC Staff concluded that the changes made were minor in nature and acceptable.

In May 2018, the Canadian Nuclear Safety Commission published Regulatory Document REGDOC-3.2.1^[13] titled "Public and Aboriginal Engagement, Public Information and Disclosure" which replaced RD/GD-99.3^[4] titled "Public Information and Disclosure".

2.0 PURPOSE AND SCOPE

SRB Technologies (Canada) Inc. (SRBT) is licensed by the Canadian Nuclear Safety Commission (CNSC) under Nuclear Substance Processing Facility Operating Licence number NSPFOL-13.00/2022^[14] for the purpose of manufacturing gaseous tritium light sources.

Therefore, a Public Information Program (PIP) that includes a Public Disclosure Protocol is a regulatory requirement for the SRBT facility. The requirements for public information programs and disclosure protocols are derived from the stated objectives of the Commission in the Nuclear Safety and Control Act (NSCA). The relevant provisions are as follows:

- *subsection 9(b) of the NSCA: “The objectives of the Commission are (a)... and (b) to disseminate objective scientific, technical and regulatory information to the public concerning the activities of the Commission and the effects, on the environment and on the health and safety of persons, of the development, production, possession and use referred to in paragraph (a).”*
- *paragraph 3(j) of the Class I Nuclear Facilities Regulations: “...the proposed program to inform persons living in the vicinity of the site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the activity to be licensed.”*

The purpose and scope of this document is to develop and implement a Public Information Program and Public Disclosure Protocol that meet the objectives of the Commission in the Nuclear Safety and Control Act and are in accordance with REGDOC-3.2.1^[13] titled “Public and Aboriginal Engagement, Public Information and Disclosure” issued by the CNSC in May 2018.

It should be noted that all correspondence related to security matters and any information which could compromise security at the discretion of the President will be withheld from release to the public. When any such information is supplied to CNSC Staff, the information will be clearly labeled as “PROTECTED SECURITY - CONFIDENTIAL - PRESCRIBED INFORMATION” in the top right hand corner of every page, or clearly identified in a similar manner.

3.0 ROLES AND RESPONSIBILITIES

The President is responsible for the design, implementation and review of the effectiveness of the Public Information Program and associated procedures to ensure that the requirements of the Nuclear Safety and Control Act, regulations, conditions of the licence and ISO 9001 are met.

The Vice President assumes full duties of the President in his/her absence.

The Executive Assistant is responsible for assisting the President with the design and implementation of the Public Information Program.

The Graphic Design Specialist is responsible for the design and development of the company public information products with input from the President and Executive Assistant.

4.0 INTRODUCTION

SRBT is a small company that has been in Pembroke since 1990 manufacturing gaseous tritium light sources. SRBT is the original developer of the gaseous tritium light source which is a glass capsule internally coated with luminescent powder and filled with tritium. The interaction between the particles emitted by the tritium and the luminescent coating produces light on a continuous basis.

FIGURE 1: VARIOUS TYPES OF TRITIUM LIGHT SOURCES PRODUCED BY SRBT



The products that SRBT manufactures which use these light sources are crucial to ensure the safety and security of people all over the world, including most NATO peace keeping forces. Other lighting technologies require wiring, power or batteries which result in a lack of reliability, portability and in some cases safety. Our lighting products do not use electricity thereby reducing energy consumption and aiding the environment against Global Warming.

FIGURE 2: VARIOUS TYPES OF PRODUCTS PRODUCED BY SRBT



AIRCRAFT ESCAPE ROUTE SIGNAGE



FLIGHT REFUELING MARKERS



MAP READER



DAM ESCAPE ROUTE MARKERS



SPECIALTY EXIT SIGNS



LANDMINE ROUTE MARKER

5.0 LOCATION

The 2016 population of the City of Pembroke was assessed in the most recent census by Statistics Canada^[15] to be 13,882 persons.

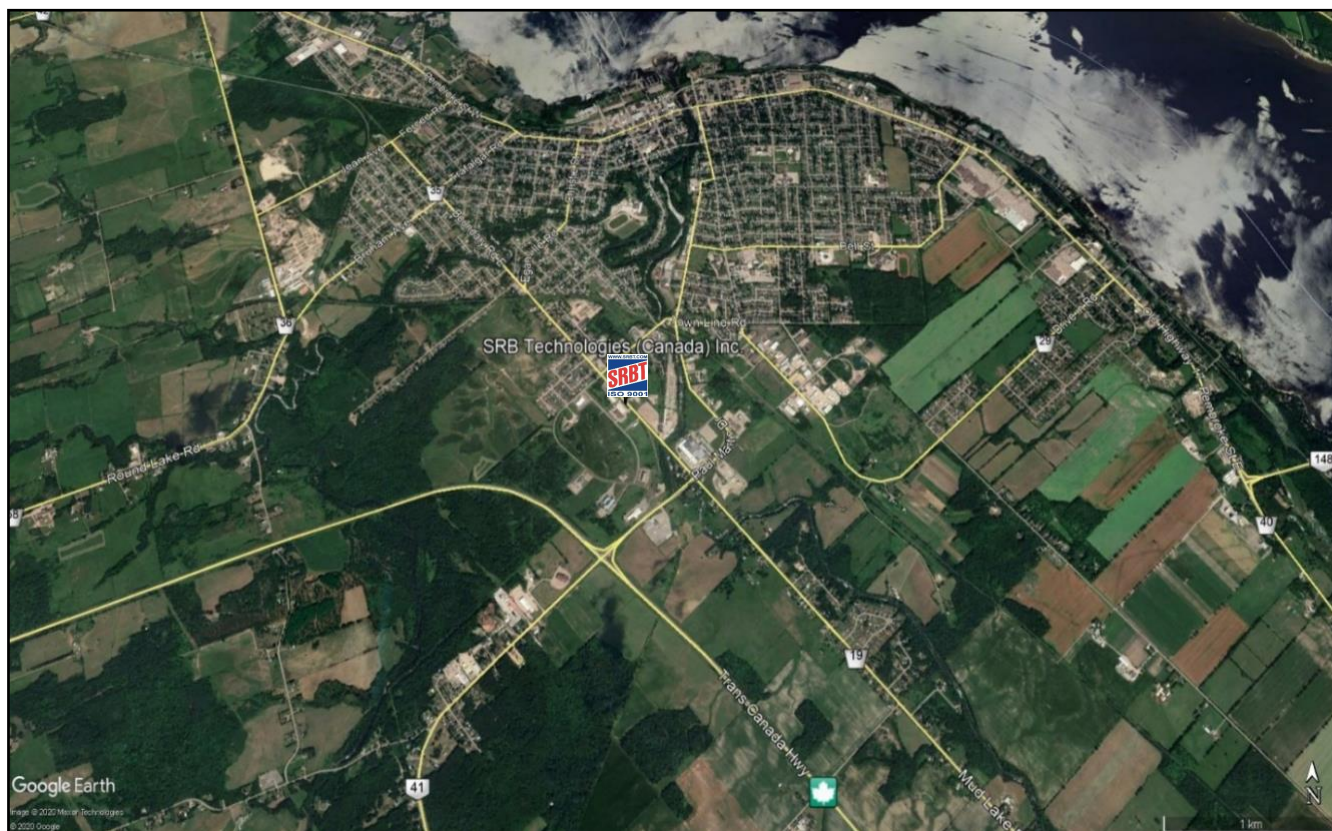
Adjacent to the City of Pembroke is Laurentian Valley Township, which is considered a census subdivision of Pembroke. The township lies to the south and west of the SRBT facility. The 2016 population of Laurentian Valley Township was assessed to be 9,387 persons.

The representative 'critical group' of public residents (as derived and discussed in the DRL report from 2016) is located approximately 250-300 metres to the north-northwest of the facility, in the subdivision known as Johnson Meadows.

Public residences are also located to the south-southeast of the facility on the opposite side of the Muskrat River, at distances beginning approximately 500 metres away. The population density is much lower than that of the Johnson Meadows subdivision.

The remaining majority of the population of the City of Pembroke lies northward of the SRBT facility, with the vast majority of residences in excess of 1,000 metres away.

FIGURE 3: MAP OF PEMBROKE



The SRBT facility is housed in a three-unit complex. Two other industrial buildings are located within 100-200 meters to the north and to the west. The Pembroke and Area Community Center is located to the northeast.

FIGURE 4: AERIAL PHOTOGRAPH OF THE FRONT OF SRBT'S FACILITY



6.0 OBJECTIVES

One of SRBT's goals is *"To be transparent, visible and open with our community, our regulators, and our staff"*.

The objectives in broad terms of SRBT's Public Information Program and Public Disclosure Protocol are to build awareness that SRBT is a nuclear substance processing facility and to have a proactive approach with the public living in the vicinity of the facility, local and adjacent businesses, local special interest groups and local elected officials and to regularly provide them with information about the operations of the company, a description and results of the company monitoring programs and the annual public dose due to tritium from SRBT in comparison to the dose from other known sources of radiation as well as to reassure the public of their health and safety.

7.0 TARGET AUDIENCE

Based upon data generated through the SRBT Environmental Monitoring Program (EMP) and Groundwater Monitoring Program (GMP) over several years, the area of meaningful influence of the SRBT facility extends out to a radius of no more than 3,500 metres from the active ventilation exhaust stacks. Emissions have the greatest effect on those working and residing within 500 meters of the facility where members of the Critical Group reside. A member of the Critical Group may receive a dose of less than 0.0024^[16] millisieverts (mSv) (*based on 2020 data*) over the course of a year which is less than 1% of the public dose limit of 1.0 mSv.

Historically public concerns and questions about SRBT have been mostly expressed by Pembroke residents and by their elected officials. As no other facility of its type now exists in Canada, the operation of the facility should continue to receive little to no interest from other communities. No public sector who explicitly have expressed interest in becoming part of the target audience has been excluded.

As SRBT operates within the City of Pembroke, the effects of the operations, although minimal, are by far the greatest on Pembroke and its residents. For these reasons the Public Information Program and Public Disclosure Protocol have been developed to reach the population of Pembroke including but not limited to:

- The Critical Group defined as individuals living within 500 meters of the facility
- Residents with wells or gardens that are being monitored by SRBT
- Local and Adjacent Businesses:
 - Messer
 - Med-Eng
 - Superior Propane
 - Valley Pool and Service
- Local Media:
 - Daily Observer (print and online)
 - Eganville Leader (print and online)
 - MyFM (radio)
 - North Renfrew Times (print and online)
 - Cogeco (television)
- Local Special Interest Group:
 - Concerned Citizens of Renfrew County and Area (CCRCA)
- Local Indigenous Groups:
 - Algonquins of Ontario
 - Metis Nations of Ontario
 - Algonquins of Anishinabeg Nation
 - Algonquins of Pikwakanagan First Nation
 - Kebaowek First Nation
- Local Elected Officials at the:
 - Municipal
 - Provincial
 - Federal level

8.0 PUBLIC AND MEDIA OPINION

As SRBT has been in Pembroke since 1990 with an extensive and public licensing history, a lot of information exists to identify and describe community and public views, opinions and concerns in relation to the licensed activities.

8.1 PUBLIC OPINION

Historically almost all public inquiries occur during licence renewal.

Since the renewal of the existing licence in 2015, we only received three inquiries from the public.

Two inquiries requested documentation in support of the 2018 Regulatory Oversight Report. One from Northwatch and the other from the Canadian Environmental Law Association (CELA). A response along with the documentation was sent within five days of both requests.

The third inquiry was in 2020, by phone from an individual living in Gatineau, Quebec. SRBT's President answered all their questions and concerns regarding radiation levels in the Ottawa River near Gatineau which has no relation to the SRBT facility. The individual was urged to contact the CNSC for any questions and concerns regarding radiation in her area or industry regulations and limits.

Historically public concerns and questions about SRBT have consistently been expressed by a small number of Pembroke residents.

The majority of these individuals belonged to two local special interest groups, The Concerned Citizens of Renfrew County And Area (CCRCA) and The First Six Years Organization. During the solicitation of the Licence Application for a fifteen (15) year licence we could not find any evidence that The First Six Years Organization is still in operation.

In the past, both groups had voiced their concerns to Pembroke City Council resulting in meetings where SRBT, special interest groups and CNSC Staff have made presentations on the impact of SRBT's operations on the community. City officials have always been satisfied with the response supplied by our company and CNSC Staff to address these questions. Municipal, Provincial and Federal elected officials have intervened on our behalf in previous license hearings and have written letters of support.

Other than comments from the two local special interest groups, there has been no evidence to indicate that the general public has any concerns regarding the presence and operations of SRBT. In fact, many individuals have approached SRBT employees, its management and President to show their support and say that SRBT should not take the concerns of the same few as representing the majority of the public.

SRBT recognizes however that it must be proactive in sharing information and therefore maintains records of all community concerns. The number of public inquiries received by SRBT either directly or indirectly through CNSC Staff, through elected officials, through local media or through any other party is tracked. These inquiries of concern or support of the facility whether given by letter, e-mail, fax, telephone or in person are kept on file with the action taken to address inquiry.

8.2 MEDIA OPINION

Since the renewal of the existing licence in 2015 the only media coverage or inquiry SRBT has received has been very positive, highlighting several achievements and contributions that SRBT has made to the surrounding community as well as the manufacturing industry.

Historically media coverage (*print, online, radio and television*) has resulted from press releases from SRBT or issued by local special interest groups for the most part during the licence renewal of the facility.

The City of Pembroke, despite its continued growth, is still considered a relatively small city with only one daily newspaper, a very low crime rate and little hard news to report on an ongoing basis. The vast majority of the news tends to be about community activities. Therefore, when any press release is sent to the media it usually results in a headline or front page coverage.

Media coverage of concern or support for the facility whether by print, television, web or radio will be kept on file when known to SRBT.

9.0 PUBLIC INFORMATION STRATEGY AND PRODUCTS

The Public Information Program provides open and transparent means and access for the public to obtain desired operational, environmental and safety information about the licensed facility or activities.

This is accomplished through various products and methods of distribution suited to best inform the target audience.

9.1 PUBLIC INFORMATION COMMITTEE MEETINGS

SRBT Senior Management has formally constituted a Public Information Committee in the organizational structure in 2010.

This Committee is comprised of at least the President, the Executive Assistant, the Graphic Design Specialist and may be complemented by another member of the SRBT Staff or Member of the Public aware of concerns of the public and/or have ideas on how to address these concerns.

Meetings are held at least twice yearly. During these meetings the Committee discusses the public's perceived opinion of SRBT based on a review of public inquiries, public survey results and media coverage all against historical data. The Committee also continuously seeks input from other staff, contractors or other individuals who may have recommendations to improve the public relations program for the company.

The information gathered during these meetings is used to develop possible new Public Information initiatives to improve the Public Information Program and Public Disclosure Protocol.

9.2 PRESS RELEASES

SRBT will regularly issue Press Releases (*or Public Notifications*) on various announcements regarding the facility.

Press Releases (*or Public Notifications*) will be written in plain language, and will include basic information on the announcement as well as contact details to allow the opportunity to ask questions of SRBT officials directly.

All Press Releases (*or Public Notifications*) are posted on SRBT's website under a dedicated section of the website clearly marked "[Public Notifications](#)".

All Press Releases (*or Public Notifications*) are also posted on SRBT's social media outlets.

As part of our Public Disclosure Protocol, a Press Release will be issued and sent by e-mail to:

- Local Media
- Local Special Interest Groups
- Local Indigenous Groups
- Local Elected Officials

...within one (1) business day after notifying the CNSC Staff of any:

- Exceedance of any Regulatory Limit
- Exceedance of any Licence Limit
- Major Events
- Major Incidents

Within five (5) business days after notifying CNSC Staff, **this** Press Release will be posted on all SRBT's social media outlets and on SRBT's website under a dedicated section of the website clearly marked "[Public Notifications](#)".

9.3 PAMPHLET

Information is presented to the public in the form of a pamphlet. The information provided is in plain language and fully referenced.

The pamphlet which is a two-page document which introduces the company to members of the public and provides some information on risks associated with emissions of the facility as well as providing clear contact information for an interested reader to acquire more detailed information.

As part of our Public Information Program and Public Disclosure Protocol a yearly update of the pamphlet is posted on SRBT's website under a dedicated section of the website clearly marked as "[Pamphlet and Brochure](#)".

Based on public concerns, the pamphlet will be sent to the public at a time deemed necessary by the Public Information Committee. The Public Information Committee will also decide which individuals will be provided the pamphlet; this may be limited to a small group of individuals, people working and living near the facility or the community as a whole. This can include, but is not limited to residences, businesses, schools, health care establishments and organizations.

Within twelve (12) months of the expiry of SRBT's Nuclear Substance Processing Facility Operating Licence, the pamphlet will be sent to all residences and businesses located within 10 kilometers of SRBT.

9.4 GENERAL BROCHURE

Information will be presented to the public in the form of brochures. The information provided is in plain language and fully referenced.

SRBT's General Brochure is an eight-page document that provides members of the public more detailed information than our pamphlet regarding the company and regarding the risks associated with emissions of the facility as well as providing clear contact information for an interested reader to acquire more detailed information. This brochure will be readily available to members of the public who express interest or concerns.

As part of our Public Information Program and Public Disclosure Protocol a yearly update of the General Brochure is posted on SRBT's website under a dedicated section of the website clearly marked as "[Pamphlet and Brochure](#)".

9.5 GROUNDWATER BROCHURE

Information will be presented to the public in the form of brochures. The information provided is in plain language and fully referenced.

SRBT's Groundwater Brochure is an eight-page document that provides members of the public detailed information regarding groundwater, monitoring well locations and concentrations, residential well locations and concentrations as well as providing clear contact information for an interested reader to acquire more detailed information.

The Groundwater Brochure will be readily available to members of the public who express interest or concerns and posted on SRBT's website under a dedicated section of the website clearly marked as "[Pamphlet and Brochure](#)".

9.6 PEMBROKE CITY COUNCIL PRESENTATIONS

SRBT will schedule a televised (on Cogeco TV) presentation to Pembroke City Council at a session of Council as deemed necessary by the Public Information Committee or as requested by the Mayor of Pembroke or Pembroke City Council Members. Those attending the presentations have the opportunity to ask questions of SRBT officials directly.

As part of our Public Disclosure Protocol, during licence renewal, SRBT will schedule at least one televised Pembroke City Council presentation to specifically discuss SRBT's operating licence renewal application less than twelve (12) months prior to expiry of the licence.

The information included in the Annual Compliance and Performance Report will be presented, and other information pertinent to the presentation will be posted on SRBT's website under a dedicated section of the website clearly marked as "[Presentations and Meetings](#)". A YouTube link to the presentation will also be included if available in this same section of SRBT's website.

The presentation will include, but not be limited to the following content: emissions from the facility for the year, environmental monitoring data for the year, public dose for the year, general update on licensing activity and update on other business matters.

9.7 PRESENTATIONS

Presentations have proven to be a useful tool for SRBT to reach the public. As part of our Public Information Program and Public Disclosure Protocol SRBT is committed to continuing to conduct presentations pertaining to our operations for members of the community to increase public knowledge and understanding of our operations. Presentations are typically conducted by Senior Management supported by other members of the staff as necessary.

In a relatively small city such as Pembroke these presentations provide a great deal of information to the public and are difficult to measure. Presentations to members of service clubs (Rotary, Kiwanis, etc.), Chamber of Commerce, financial institutions and local educational facilities have been performed with a positive response. Those attending the presentations have the opportunity to ask questions of SRBT officials directly.

Details of these presentations will be kept on file and the most notable will be posted on SRBT's website under a dedicated section of the website clearly marked as "[Presentations and Meetings](#)".

9.8 MEETINGS WITH LOCAL SPECIAL INTEREST GROUPS

If deemed necessary by the Public Information Committee or as requested by members of the local special interest group, SRBT will schedule one or more meetings with members of the local special interest group to specifically discuss SRBT's operating licence renewal application, updates on the overall operations, emissions, monitoring results, mitigation measures, incidents and any other current activity that may be of interest.

Meetings will be held at a convenient location in Pembroke where members of the local special interest groups will have the opportunity to ask questions of SRBT officials directly.

Details of these meetings will be posted on SRBT's website under a dedicated section of the website clearly marked as "[Presentations and Meetings](#)".

9.9 PUBLIC MEETINGS

If it is perceived by the Public Information Committee that there is an elevated level of public interest in SRBT a public meeting may then be scheduled at a convenient location in Pembroke where members of the public will have the opportunity to ask questions of SRBT officials directly. Details of these meetings will be posted on SRBT’s website under a dedicated section of the website clearly marked as “[Presentations and Meetings](#)”.

9.10 REPORTS OF ENVIRONMENTAL MONITORING RESULTS TO RESIDENTS

Reports of environmental monitoring results are provided to residents with wells or gardens that are being monitored by SRBT with the anticipated radioactive exposure due to tritium from consuming either the water or produce. We provide members of the public a comparison of this exposure against the CNSC limit and against radioactive exposure from other known sources, such as cosmic radiation, x-rays, etc.

9.11 SOCIAL MEDIA

SRBT maintains a number of social media outlets which are updated periodically. All Press Releases (or Public Notifications) are posted on SRBT’s social media outlets.

- [Facebook](#)
- [Instagram](#)
- [LinkedIn](#)
- [Reddit](#)
- [Tik Tok](#)
- [Twitter](#)

9.12 WEBSITE

SRBT maintains a comprehensive website at “[srbt.com](#)” (also hosted at “[srbtechnologies.com](#)” and “[betalight.com](#)” which is a tradename known to many customers of SRBT):

FIGURE 5: SRBT’S WEBSITE



The website is readily available to anyone with internet access and advertised on the main sign of our building, most search engines, all company literature, stationary, business cards, etc.

The website is frequently updated to provide up to date information on:

- [Company and Vision](#)
- [Products](#)
- [Disposal and Recycling](#)
- [Transport](#)
- [Public Disclosure Protocol](#)
- [Public Notifications](#)
- [Contact Info](#)
- [Pamphlet and Brochure](#)
- [Licence and Handbook](#)
- [Annual Compliance Reports](#)
- [Other Reports and Monitoring Results](#)
- [Presentations and Meetings](#)
- [Tritium Information](#)
- [Public Surveys](#)
- [Emergency Preparedness](#)
- [Community Involvement](#)

As part of our Public Disclosure Protocol SRBT is committed to posting information of interest to all stakeholders.

9.13 PLANT TOURS

Plant tours have proven to be a useful tool for SRBT to reach the public. As part of our Public Information Program and Public Disclosure Protocol, SRBT is committed to continuing to conduct regular tours of our operations for members of the community to increase public knowledge and understanding of our operations. Tours are typically conducted by Senior Management supported by other members of the staff as necessary.

In a relatively small city such as Pembroke these tours provide a great deal of information to the public and are difficult to measure. Tours to members of the public, local contractors, local educators and to employees of local and adjacent businesses have been performed with a positive response.

Those being given a plant tours have the opportunity to ask questions of SRBT officials directly.

Date of each tour and name of institution or individuals who are given a tour are kept on file with some information reported in SRBT's Annual Compliance Reports.

9.14 TRAINING OF EMERGENCY RESPONSE PERSONNEL

SRBT has always maintained a good rapport with emergency response personnel.

Emergency Scenarios mostly involve the Pembroke Fire Department (PFD). As a result the PFD is provided relevant training to help them face an emergency while being assured that their health and safety is not in danger.

Communication is frequent between SRBT and members of the PFD and training frequency is determined by both SRBT and the PFD. The Paramedic and Police services may also need to be involved in an emergency but will be accompanied by SRBT staff member during a response and therefore do not require ongoing training.

9.15 COLLABORATIONS

As part of our Public Information Program and Public Disclosure Protocol SRBT is committed to continuing to collaborate with other members of the Nuclear Industry.

SRBT collaborated with the CNSC, the University of Ottawa, L'Institut de Radioprotection et de Sûreté Nucléaire (IRSN) and the Radiation Safety Program of Algonquin College which has led to an increased understanding of SRBT's operations.

In 2018, SRBT collaborated with Canadian Nuclear Laboratories (CNL) and the University of Ottawa on a research project, investigating the activation of organically-bound tritium at different depths in soil.

9.16 FUNDRAISING AND SPONSORSHIPS

SRBT will continue to enhance public awareness of its presence within the community by continuing its participation in various fundraising, charitable events, sponsorship of sport teams and local individuals.

SRBT continues to support the local community by providing support to various organizations and causes. A full list of SRBT's community support can be found in our Annual Compliance Reports and posted on SRBT's website under a dedicated section of the website clearly marked as "[Community Involvement](#)".

SRBT is a member of the Upper Ottawa Valley Chamber of Commerce. SRBT is a sponsor of the Muskrat Watershed Council in support of the water quality monitoring data report and ongoing work.

SRBT is a member of the Canadian Council for Aboriginal Business (CCAB). CCAB builds bridges between Aboriginal and non-Aboriginal peoples, businesses, and communities through diverse programming, providing tools, training, network building, major business awards, and national events. CCAB is a national, non-partisan, member-based organization. With a membership which is comprised of both Indigenous and non-Indigenous companies operating in Canada. Joining the CCAB further demonstrates SRBT's commitment to positive relationships with Indigenous Peoples and communities. As a member of CCAB we will continue to be transparent, visible and open with Indigenous communities and regularly provide information about our operations, while continuing to have a workplace that employs and is welcoming to Indigenous employees.

9.17 ACTIVE PRESENCE IN COMMUNITY

The President of SRBT is a member of the Pembroke Economic Development Tourism Advisory Committee (PEDTAC), Chair of the Community Improvement Plan and a Board Member of the Ottawa River Energy Solutions. Regular meetings take place where updates on SRBT are often discussed. The Mayor, Deputy Mayor or City Council member are in attendance as well as a number of residents of Pembroke and surrounding community.

The Manager of Health Physics and Regulatory Affairs is a member of the Algonquin College Radiation Safety Program Advisory Committee. Meetings take place where reference is made to SRBT from time to time.

10.0 PROGRAM EVALUATION AND IMPROVEMENT PROCESS

The Public Information Program includes a process for evaluating its performance and for developing and implementing measures to improve effectiveness.

10.1 PUBLIC INFORMATION COMMITTEE REVIEWS

As part of our Public Disclosure Protocol, meetings are held by Public Information Committee at least twice yearly. During these meetings the Committee discusses the public's perceived opinion of SRBT based on a review of public inquiries, public survey results and media coverage all against historical data.

The information gathered during these meetings is used to develop possible new Public Information initiatives to improve the Public Information Program and Public Disclosure Protocol.

10.2 YEARLY MANAGEMENT SELF-ASSESSMENT

On an annual basis management evaluates the effectiveness of the Public Information Program through the evaluation of comments, questions and concerns raised by the public during the course of the year. If the concerns from the public relate to a specific area, SRBT will amend the program to address this specific area of concern differently or in more detail.

Should the concern on a specific issue subside then SRBT will have achieved its goal of reassuring the public of their health and safety on this specific concern. If overall concerns after implementing this program diminish over time then SRBT will have succeeded in reassuring the public of their overall health and safety. If a specific concern or overall concerns increase SRBT will adapt its program accordingly.

All members of the public are entitled to their opinions and it is expected that some may not be reassured by the information supplied through the Public Information Program. SRBT respects these opinions and takes them seriously. Negative personal feelings towards anything associated with radioactivity can stem from a number of reasons and in some cases may not be affected by a Public Information Program. This will be considered in the evaluation of the program's effectiveness.

As in the past it is anticipated that members of a local special interest group may decide to contact CNSC Staff, or local elected officials instead of SRBT with comments, questions and concerns with respect to SRBT. However, SRBT is willing to work with CNSC Staff and others to ensure that any questions with respect to the facility and its operations are fully addressed.

10.3 SURVEYS

As deemed necessary by the Public Information Committee, SRBT will formally survey the public on various topics of interest and concerns. A copy of the surveys can also be found on SRBT's website under a dedicated section of the website clearly marked as "[Public Surveys](#)".

Results will be used to determine the effectiveness of SRBT's Public Information Program and serve as an opportunity for continuous improvement.

10.4 INTERNAL AUDITS

The Public Information Program is audited internally by the Compliance Manager at least once every three years.

11.0 CONTACT INFORMATION

The contact information for the person responsible for the Public Information Program is:

Stephane Levesque
President
SRB TECHNOLOGIES (CANADA) INC.
320-140 Boundary Road
Pembroke, Ontario, Canada
K8A 6W5
Tel: (613) 732-0055, Extension 111
Cel: (613) 639-1349
Fax: (613) 732-0056
E- mail: stephane@betalight.com

12.0 PUBLIC DISCLOSURE PROTOCOL

One of SRBT's goals is *"To be transparent, visible and open with our community, our regulators, and our staff"*.

SRBT's Staff led by Senior Management are committed to achieving this goal by having suitable mechanisms in place to provide specific information to the target audience, in a clear, concise and timely manner.

SRBT is also committed to the continuous review of the effectiveness of these mechanisms, and to make modifications to adapt to perceived changes in public perception.

SRBT implements a Public Information Program which outlines the mechanisms used to achieve this goal.

The effects of the operations, although minimal, are by far the greatest on Pembroke and its residents. For these reasons the Public Information Program and Public Disclosure Protocol have been developed to reach the population of Pembroke including but not limited to:

- The Critical Group defined as individuals living within 500 meters of the facility
- Residents with wells or gardens that are being monitored by SRBT
- Local and Adjacent Businesses:
 - Messer
 - Med-Eng
 - Superior Propane
 - Valley Pool and Service
- Local Media:
 - Daily Observer (print and online)
 - Eganville Leader (print and online)
 - MyFM (radio)
 - North Renfrew Times (print and online)
 - Cogeco (television)
- Local Special Interest Group:
 - Concerned Citizens of Renfrew County and Area (CCRCA)
- Local Indigenous Groups:
 - Algonquins of Ontario
 - Metis Nations of Ontario
 - Algonquins of Anishinabeg Nation
 - Algonquins of Pikwakanagan First Nation
 - Kebaowek First Nation
- Local Elected Officials at the:
 - Municipal
 - Provincial
 - Federal level

The activities outlined in the Public Information Program demonstrates that SRBT is committed to:

- Maintaining two-way communication channels to address the questions and concerns of people within our target audience in a timely and clear manner.
- A Press Release will be issued and sent by e-mail to:
 - Local Media
 - Local Special Interest Groups
 - Local Indigenous Groups
 - Local Elected Officials...within one (1) business day after notifying the CNSC Staff of any:
 - Exceedance of any Regulatory Limit
 - Exceedance of any Licence Limit
 - Major Events
 - Major IncidentsWithin five (5) business days after notifying CNSC Staff, **this** Press Release will be posted on all SRBT's social media outlets and on SRBT's website under a dedicated section of the website clearly marked "[Public Notifications](#)".
- Within five (5) business days after notifying the CNSC Staff, of any other Reportable Event, the report will be posted on SRBT's website under a dedicated section of the website clearly marked as "[Other Reports and Monitoring Results](#)".
- Within five (5) business days after filing an application with the CNSC, posting on our website information related to SRBT's Nuclear Substance Processing Facility Operating Licence renewal or amendment applications.
- Within five (5) business days after issuance to CNSC Staff, posting on our website all Annual Compliance Report and associated amendments and/or addendums under a dedicated section of the website clearly marked as "[Annual Compliance Reports](#)".
- Within five (5) business days after becoming available, posting on our website all CNSC Regulatory Oversight Report under a dedicated section of the website clearly marked as "[Annual Compliance Reports](#)".
- On a yearly basis, posting on SRBT's website an update the Pamphlet and the General Brochure under a dedicated section of the website clearly marked as "[Pamphlet and Brochure](#)".
- Posting on our website the latest version of specific company documents of interest to the public including but not limited to:
 - [Environmental Risk Assessment \(ERA\)](#)
 - [Preliminary Decommissioning Plan \(PDP\)](#)
 - [Safety Analysis Report \(SAR\)](#)
- Posting on our website the latest and previous version of our:
 - [Operating Licence](#)
 - [Licence Condition Handbook](#).
- Posting on SRBT's website any reports, documents or results that may be of interest to the public.
- Scheduling at least one televised Pembroke City Council presentation to specifically discuss SRBT's operating licence renewal application less than twelve (12) months prior to expiry of the licence.

- Meeting members of the public as required to provide the opportunity to ask questions of SRBT officials directly.
- Conducting regular tours of our operations for members of the community to increase public knowledge and understanding of our operations.
- Performing presentations pertaining to our operations for members of the community to increase public knowledge and understanding of our operations.
- Reviewing at least twice yearly what is believed the public perception is regarding the operations and make modifications to Public Information Program as deemed necessary.
- Continuing to collaborate with other members of the Nuclear Industry.
- Post the company's Public Information Program and Public Disclosure Protocol on SRBT's website under a dedicated section of the website clearly marked as "[Public Disclosure Protocol](#)".

13.0 PUBLIC DISCLOSURE NOTIFICATION

SRBT will inform the CNSC Staff of the disclosures made under the Public Disclosure Protocol specifically as follows:

- A Press Release will be issued and sent by e-mail to:
 - Local Media
 - Local Special Interest Groups
 - Local Indigenous Groups
 - Local Elected Officials
- ...within one (1) business day after notifying the CNSC Staff of any:
 - Exceedance of any Regulatory Limit
 - Exceedance of any Licence Limit
 - Major Events
 - Major Incidents

Within five (5) business days after notifying CNSC Staff, **this** Press Release will be posted on all SRBT's social media outlets and on SRBT's website under a dedicated section of the website clearly marked "[Public Notifications](#)".

- Within five (5) business days after notifying the CNSC Staff, of any other Reportable Event, the report will be posted on SRBT's website under a dedicated section of the website clearly marked as "[Other Reports and Monitoring Results](#)".
- Within five (5) business days after filing an application with the CNSC, posting on our website information related to SRBT's Nuclear Substance Processing Facility Operating Licence renewal or amendment applications.
- Scheduling at least one televised Pembroke City Council presentation to specifically discuss SRBT's operating licence renewal application less than twelve (12) months prior to expiry of the licence.
- Meetings, tours of our operations and presentations pertaining to our operations that have taken place for:
 - Local Special Interest Groups
 - Local Indigenous Groups

Notification will be sent to CNSC Staff's Project Officer for SRBT with the subject title PUBLIC DISCLOSURE – [SRB Technologies (Canada) Inc., date of disclosure].

14.0 DOCUMENTATION AND RECORDS

Documents and records on public information and disclosure activities will be maintained and kept on file for a period of at least 5 years and should be readily available upon request.

15.0 REFERENCES

- [1] SRB Technologies (Canada) Inc., "Public Information Program", Revision 6, January 7, 2008.
- [2] Canadian Nuclear Safety Commission, Regulatory Guide, "Licensee Public Information Program", G-217, January 2004.
- [3] CNSC Staff letter, Ann Erdman to Stephane Levesque, "Public Information Program", February 29, 2008.
- [4] Canadian Nuclear Safety Commission, Regulatory Document, "Public Information and Disclosure", RD/GD-99.3, March, 2012.
- [5] CNSC Staff letter, Nadia Petseva to Stephane Levesque, "Publication of Regulatory Document RD/GD-99.3, Public Information and Disclosure", July 11, 2012.
- [6] SRB Technologies (Canada) Inc., "Public Information Program", Revision 7, April 21, 2014.
- [7] CNSC Staff letter, Nadia Petseva to Stephane Levesque, "CNSC review of SRB Technologies Public Information and Disclosure Program", June 10, 2014.
- [8] SRB letter, Stephane Levesque to Nadia Petseva, "CNSC review of SRB Technologies Public Information and Disclosure Program", July 14, 2014.
- [9] CNSC Staff e-mail, Nadia Petseva to Stephane Levesque, "Response to CNSC Staff Letter Dated June 10, 2014", July 17, 2014.
- [10] SRB Technologies (Canada) Inc., "Public Information Program", Revision 8, July 31, 2014.
- [11] SRB Technologies (Canada) Inc., "Public Information Program", Revision 9, September 25, 2015.
- [12] CNSC Staff letter, Jennifer Campbell to Stephane Levesque, "SRB Technologies Public Information Program" Revision 9, October 26, 2015.
- [13] Canadian Nuclear Safety Commission, Regulatory Document, "Public and Aboriginal Engagement Public Information and Disclosure", REGDOC-3.2.1, May 2018.
- [14] Canadian Nuclear Safety Commission, "Nuclear Substance Processing Facility Operating Licence", NSPFOL-13.00/2022.
- [15] Census information from Statistics Canada website at <https://www12.statcan.gc.ca/census-recensement/2016/dppd/prof/details/page.cfm?Lang=E&Geo1=CSD&Code1=3547064&Geo2=PR&Code2=35&SearchText=Pembroke&SearchType=Begins&SearchPR=01&B1=All&TABID=1&type=0>
- [16] SRB Technologies (Canada) Inc., "2020 Annual Compliance Report", NSPFOL-13.00/2022, page 137 of 172, March 31, 2021.