

SRB TECHNOLOGIES (CANADA) INC.

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SRB TECHNOLOGIES (CANADA) INC.

Presentation to The City of Pembroke Review of 2008 and Annual Compliance Report

Date:

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INTRODUCTION

This presentation will use relevant sections, tables and figures of the 2008 Annual Compliance Report as the basis for the 2008 review.

The 2008 Annual Compliance Report is available on our web site and has been provided to CNSC Staff, to Members of the Concerned Citizens of Renfrew County and to The City of Pembroke.

The purpose of the Annual Compliance Report is to meet the reporting requirements of our Licence by providing the following information for each calendar year:

- Operational review
- Information on production
- Modifications
- Health physics information
- Environmental and radiological compliance
- Facility effluents
- Waste management
- Updates
- Compliance with other Regulations.
- Non-radiological health and safety activities
- Public information initiatives
- Forecast

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1.0 OPERATIONAL REVIEW

1.1 SIGNIFICANT EVENTS / HIGHLIGHTS

Following a two day public hearing held on April 3 and June 12, 2008 the CNSC announced its decision to issue SRB a two-year operating licence. This licence permitted SRB to resume its processing operations.

The Commission's issuance of the operating licence provided job security for our existing workforce, ensured an ongoing revenue stream to help to continue to fund the facility's financial guarantee and allow our company to continue to make further improvements to reduce emissions and further protect the public and the environment.

The operating licence also allows SRB to honour important contracts with high national security value for which SRB is the sole supplier.

From the date of the issuance of the licence, processing resumed incrementally with the existing staff. One former employee was rehired in September 2008 followed by two more later in 2009.

2.0 INFORMATION ON PRODUCTION

2.1 POSSESSION LIMIT

The maximum tritium activity possessed at any time during 2008 did not exceed 4,189 TBq compared to a maximum of 6,000 TBq allowed by the licence.

2.2 IMPORT AND EXPORT ACTIVITIES

In 2008, SRB applied for and received from the CNSC export licenses for countries worldwide for the purpose of exporting and supplying its products.

2.3 SHIPPING ACTIVITIES

In 2008, SRB prepared, packaged and shipped, in accordance with the applicable regulations, 231 consignments to various customers located in 12 countries around the world including Canada.

2.5 RELEASE LIMITS TO ATMOSPHERE

Throughout the year SRB operated under the release limits prescribed in its licence.

2.5.1 AIR RELEASES UNDER POSSESSION LICENCE

From January 1 to July 1, 2008 SRB operated under a Possession Licence and associated release limits to atmosphere.

NUCLEAR SUBSTANCE AND FORM	LIMIT (GBq)	% OF LIMIT
Tritium Oxide (HTO)	135,000	1.90%
Tritium Oxide (HTO) and Tritium Gas (HT)	521,000	0.13%

TABLE 1: AIR RELEASES UNDER POSSESSION LICENCE AGAINST LIMIT:

2.5.2 AIR RELEASES UNDER PROCESSING LICENCE

From July 1 to December 31, 2008 SRB operated under a Processing Licence and associated release limits to atmosphere.

NUCLEAR SUBSTANCE AND FORM	LIMIT (GBq)	% OF LIMIT
Tritium Oxide (HTO)	67,200	15.35%
Tritium Oxide (HTO) and Tritium Gas (HT)	448,000	17.21%

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2.7 AIR EMISSION REDUCTION TARGET

Based on operational experience SRB has developed a realistic but optimistic weekly "Emission Reduction Target" for the operation with tritium processing. Emissions in 2008 while processing were at 78.51% of this target:



2.8 RELEASE LIMIT TO SEWER

Throughout the year SRB operated under release limits to sewer prescribed under its licence.

NUCLEAR SUBSTANCE AND FORM	% OF LIMIT
Tritium water soluble	14.75%

3.0 MODIFICATIONS

3.1.3 VISION, MISSION, GOALS, VALUES AND POLICY

In 2008 with the involvement of all staff, Senior Management have formally reviewed the company's vision, mission, goals, values and policy.

FIGURE 3: COMPANY'S GOVERNING PRINCIPLES

	SRBT
Our	Vision
Strive 1 proces custon	to maintain or exceed the standing required to allow our company to s tritium and manufacture life safety devices to fulfill the needs of our ners.
Our	Mission
Contin require of the	uously improve company programs in order to meet or exceed the ments of the Nuclear Safety and Control Act, Regulations and conditions licence in order to strive to achieve higher grades in all safety areas.
Our	Goals
1. To p all e may	romote a strong safety culture throughout the organization by having imployees continuously assess and analyze any impact the operations have on the public and the environment.
2. To re to er	educe any risk to the public and the environment due to the operations nsure that requirements of the Nuclear Safety and Control Act, Regulations, ditions of the licence and ISO 9001 requirements are met or exceeded.
3. To b and	e transparent, visible and open with our community, our regulators, our staff.
4. To e spec Reg	nsure that the products are supplied to customer requirements and ifications and to the requirements of the Nuclear Safety and Control Act, ulations, conditions of the licence and ISO 9001 requirements.
5. To c prog	ontinue to lower emissions and improve the effectiveness of our grams and processes.
Our	Values
We wi memb and co	I achieve our goals by acting with integrity with the regulators, the ers of the public and our employees, and by respecting their input intribution by making improvements based on this input.
Our	Policy
It is the experi conser and th	e policy of the company and its employees to learn from our operational ence and research, to consider the input of all stakeholders and be vative in our decision making to ensure the protection of the public e environment to achieve the goals that we have set to meet our to defen

3.2 PROGRAMS, PROCEDURES AND ASSOCIATED DOCUMENTS

In 2008, a number of programs and procedures continue to be improved to further ensure protection of the public, the workers and the environment. Improvements continue to be made as a result of SRB staff's research and study of International Atomic Energy Agency documents, CNSC Regulatory Guides, recommendations from the International Commission on Radiological Protection, various industry standards and documents of other CNSC licensees.



4.0 HEALTH PHYSICS INFORMATION

4.1 DOSIMETRY SERVICES

SRB received the Certificate of Achievement for successful participation in the Tritium Urinalysis Intercomparison Program National Calibration Reference Centre for Bioassay and In Vivo Monitoring for the year 2008.

4.2 STAFF RADIATION EXPOSURE

The maximum annual dose received by any person employed by SRB is well within the regulatory limit for a nuclear energy worker, which is 50.0 mSv per calendar year:

	2005 (mSv)	2006 (mSv)	2007 (mSv)	2008 (mSv)	CNSC LIMIT (mSv)
Average	0.50	0.30	0.04	0.16	50.0
Maximum	3.16	3.35	0.48	1.34	50.0

Note: On average, public radiation exposure in Canada due to all natural sources is 2.40 mSv.

5.0 ENVIRONMENTAL AND RADIOLOGICAL COMPLIANCE

SRB Technologies (Canada) Inc. developed an environmental monitoring program that provides data for site-specific determination of tritium concentrations along the various pathways for exposure probabilities to the public due to the activities of the operations.



5.2 PUBLIC DOSE FOR A MEMBER OF THE CRITICAL GROUP FOR 2008

The dose assessed for the Critical Group is a summation of:

- Tritium uptake from inhalation and absorption through skin.
- Tritium uptake due to consumption of well water.
- Tritium uptake due to consumption of produce.
- Tritium uptake due to consumption of dairy products.

The maximum annual dose received by any member of the public as a result of the operations of SRB is well within the regulatory limit for a member of the public, which is 1.0 mSv per calendar year:

	2005 (mSv)	2006 (mSv)	2007 (mSv)	2008 (mSv)	CNSC LIMIT (mSv)
Public dose	0.0337	0.0145	< 0.01	< 0.01	1.0

Note: On average, public radiation exposure in Canada due to all natural sources is 2.40 mSv.

7.0 WASTE MANAGEMENT

7.3.1 INTERIM STORAGE OF "VERY LOW-LEVEL WASTE"

Waste that is only minimally contaminated and contains activity levels of 4.0 Bq/cm² or less is considered "very low-level waste". Examples of such waste are typically paper towel, gloves, disposable lab coats, shoe covers, etc. "Very low-level waste" is collected, assessed, and placed in steel drums. Once a drum is full it is prepared for interim storage and transferred to the secure fenced compound area awaiting transfer to a CNSC licensed waste handling facility.

VERY LOW-LEVEL WASTE CONTAINER DESCRIPTION	AMOUNT IN STORAGE AT YEAR END 2008 (CONTAINER)	TOTAL ACTIVITY OF TRITIUM (GBq)
200 Liter Steel Drums	63	1.98
*200 Liter Steel Drums	33	0.09

TABLE 16: INTERIM STORAGE OF "VERY LOW LEVEL WASTE"

* Contains excavated soil from the well drilling activities performed on-site.

Note: One tritium exit sign with a 20 year life contains approximately 700 GBq's.

7.3.2 INTERIM STORAGE OF "LOW-LEVEL WASTE"

"Low-level waste" is defined as any waste with activity levels that exceed 4.0 Bq/cm². Typical examples of such waste are tritium-contaminated equipment or components, crushed glass, filters, broken lights, clean-up material, pumps, pump oil, etc. Low-level waste is collected, assessed, and placed in steel drums. Once a drum is full it is prepared for interim storage and placed in the Waste Storage Room awaiting transfer to a CNSC licensed waste handling facility.

LOW-LEVEL WASTE CONTAINER DESCRIPTION	AMOUNT IN STORAGE AT YEAR END 2008 (CONTAINER)	TOTAL ACTIVITY OF TRITIUM (GBq)	
* 200 Liter Steel Drums	13	20,100	
** 70 Liter Steel Drums	11	660	

TABLE 17: INTERIM STORAGE OF "LOW LEVEL WASTE"

* Contains used equipment components, crushed glass, filters, broken lights, rags, solidified pump oil etc. ** Contains only oil sealed high vacuum pumps.

Note: One tritium exit sign with a 20 year life contains approximately 700 GBg's.

8.0 UPDATES

8.1 GROUNDWATER

Monitoring results are provided to CNSC Staff and Ontario Ministry of the Environment Staff on a monthly basis.

The highest concentration of approximately 40,000 Bq/L is in a monitoring well located near the stack area of the SRB property.

SRB has been monitoring a number of residential wells used for drinking water for more than two years and concentrations have ranged from 4 Bq/L to less than 1,500 Bq/L (depending on their location in relation to the facility), or less than 20% of the Ontario Drinking Water Standard of 7,000 Bq/L. International standards for drinking water range between 100 to 76,103 Bq/L.

The decrease in emissions together with natural decay will eliminate tritium concentrations in groundwater in excess of the drinking water guideline over time.

8.4 FIRE PROTECTION

In 2008, both the Pembroke Fire Department and an Independent Consultant performed fire protection inspections of the SRB facility. Any findings were addressed promptly.

8.6 QUALITY ASSURANCE

In addition to 19 internal audits an external audit of our operations was also performed by our ISO 9001 registrar in 2008.

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10.0 NON-RADIOLOGICAL HEALTH AND SAFETY ACTIVITIES

SRB is subject to Federal Jurisdiction thus, Part II of the Canada Labour Code (Occupational Health and Safety).

During 2008 there were 2 facility visits by a Health and Safety Officer from HRSDC. Any findings were promptly addressed and closed.

During 2008 no individuals were taken to the outpatient department at the local hospital and no incident resulted in lost time.

11.0 PUBLIC INFORMATION INITIATIVES

11.1 WEBSITE

The website is frequently updated to provide current information on the facility.

11.2 PUBLIC

We address inquiries from members of the public and provide information accordingly.

We sample the water in a number of wells belonging to the public for tritium concentration. We also sample produce from gardens belonging to members of the public for tritium concentration. We promptly provide each member of the public with a report of the sample results along with the anticipated radioactive exposure due to tritium from consuming either the water or produce.

11.3 CITY OF PEMBROKE

We regularly provide the Mayor and City of Pembroke officials information on licensing actions or other issues regarding SRB.

11.4 FEDERAL MEMBER OF PARLIAMENT

We regularly provide our local Member of Parliament and staff with information on licensing actions or other issues regarding SRB.

11.5 NEIGHBOURS

We have initiated a number of meetings and discussions with our landlord and neighbours to provide them information on our operation.

11.6 MEDIA

SRB regularly answers questions from the media and have provided statements which resulted in balanced media coverage.

11.7 PRESS RELEASES

In 2008 three press releases were issued to the media:

- June 26, 2008: SRB granted 2 year processing licence by the CNSC.
- April 15, 2008: SRB has agreed with the City to do soil sampling.
- February 1, 2008: SRB applies to the CNSC for a processing licence.

11.8 PAMPHLET

An updated pamphlet has been produced which describes the radiation exposure from SRB as a result of its operations. In the pamphlet we also 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.

The pamphlet is available on the company website and was mass distributed by mail to all 8,800 residences and businesses in Pembroke in April 2008. Another mailing of this pamphlet is also scheduled later this year.

11.9 HEARINGS

As part of the licence hearings a total of 38 submissions were received by the CNSC from the public.

20 submissions were received in support of SRB's application seeking authorization to resume processing and use of tritium.

A total of 18 submissions were received, for the most part, from individuals associated with local interest groups (Concerned Citizens of Renfrew County and the First 6 Years) who either expressed concerns or were opposed to a possible resumption of operations.

We have written to all 18 members of the public who expressed concerns or were opposed to a possible resumption of operations in an attempt to address their concerns and we will continue to provide these individuals information on the operations of the company.

11.10 PLANT TOURS

In 2008 plant tours were provided to:

- Members of the Canadian Nuclear Safety Commission.
- Local Provincial Member of Parliament Mr. John Yakabuski.