SRB Technologies (Canada) Inc.

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2022 Annual Compliance and Performance Report

Reporting Period:	January 1 – December 31, 2022	
Licence Number:	NSPFOL-13.00/2022	(Jan. 1 – Jun. 30, 2022)
	NSPFL-13.00/2034	(Jul. 1 – Dec. 31, 2022)
Licence Condition:	3.2	

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SRB Technologies (Canada) Inc.

2022 Annual Compliance and Performance Report

Submission date: March 31, 2023

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Executive Summary

SRB Technologies (Canada) Incorporated (SRBT) is pleased to provide this compliance and performance report to the Canadian Nuclear Safety Commission (CNSC) as part of our licensed activities.

Our facility continues to process tritium safely, responsibly and efficiently, and we are proud of the level of performance and improvements achieved during 2022. No nuclear safety-related events or significant safety-related issues occurred, and the safety of workers, the public and the environment was maintained at all times.

Following a public hearing held virtually on April 27, 2022, the CNSC announced its decision to renew SRBT's Nuclear Substance Processing Facility Licence for a period of 12 years.

This represents the longest licence term in SRBT's history. Based on the evidence provided, the Commission was satisfied that SRBT has adequate programs and measures in place to ensure that the health and safety of workers, the public and the environment will be protected over the 12-year licence term.

In 2022, SRBT processed 26,940,372 GBq of tritium into self-luminous light sources and safety devices; in comparison, in 2021, a total of 29,392,257 GBq of tritium was processed.

The ratio of the amount of tritium released to atmosphere versus the amount of tritium processed during the year remained very low (0.10%). This ratio met our annual internal target of 0.11%, and equalled the ratio achieved in 2021.

Tritium oxide releases to atmosphere rose marginally in 2022 in comparison to the year previous, with 8,816 GBq of oxide being released (vs. 8,387 GBq in 2021).

The total amount of tritium (elemental + oxide) released to the environment through the gaseous effluent pathway decreased slightly (26,590 GBq) compared with the previous year (28,729 GBq).

The average weekly rate of gaseous tritium releases met our target for 2022; on the average, 511 GBq of tritium was released weekly, versus our target of 625 GBq per week.

Once again, no staff member exceeded 1 mSv for the year – a value that represents the dose limit to the public. A collective dose of 2.01 person·mSv was accrued by staff. As well, no action levels were exceeded with respect to radiation doses. This is a testament to the continued diligence of our workers in maintaining radiation exposures as low as reasonably achievable.

The conservatively-calculated dose to the most-exposed member of the public remains far less than 1% of the prescribed annual limit of 1 mSv, as derived from direct sampling and monitoring of the local environment. Groundwater tritium concentrations continue to respond favorably to modified and optimized processing practices.

In 2022, CNSC staff performed two inspections at the facility; all identified compliance and improvement items have either been addressed, or are in the process of being addressed by our team.

Throughout the year, SRBT provided CNSC staff revisions of a number of key documents associated with our licensing basis, including our Effluent Monitoring Program, Maintenance Program, and Waste Management Program. All program revisions were accepted by CNSC staff.

Our Financial Guarantee for future decommissioning remains fully funded. The Financial Guarantee does not rely on insurance, letters of credit or third-party resources in order to ensure funding availability for future decommissioning of the facility; the funds are held in escrow for access via a Financial Agreement with the Commission.

We continue to improve and implement a successful and effective Public Information Program, and are striving to work towards a collaborative and open relationship with Indigenous communities in the area.

In summary, 2022 represents a highly successful and safe year of operation for SRBT. Continual improvements in compliance and safety is an ongoing mission, and we will always strive to reduce our operational impact on the environment, and to optimize safety and the effective doses to our workers and the public.

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Acronyms and Abbreviations

ACR	Annual Compliance Report / Annual Compliance and Performance Report
AOPFN	Algonquins of Pikwakanagan First Nation
Bq	Becquerel • MBq → megabecquerel • GBq → gigabecquerel • TBq → terabecquerel
BSI	British Standards Institute
CCAB	Canadian Council for Aboriginal Business
CLC	Canada Labour Code
CLW	Clearance Level Waste
CMD	Commission Member Document
CNA	Canadian Nuclear Association
CNL	Canadian Nuclear Laboratories
CNSC	Canadian Nuclear Safety Commission
COVID-19	Coronavirus Disease (2019)
CSA	Canadian Standards Association
CSM	Conceptual Site Model
CVC	Compliance Verification Criteria
DRL	Derived Release Limit
DS	Downspout
ECR	Engineering Change Request
EffMP	Effluent Monitoring Program
EMP	Environmental Monitoring Program
EMS	Environmental Management System
ERA	Environmental Risk Assessment

Acronyms and Abbreviations

FASC	Facility Access Security Clearance
FG	Financial Guarantee
FHA	Fire Hazard Assessment
GMP / GWMP	Groundwater Monitoring Program
GTLS	Gaseous Tritium Light Source
HT	Elemental Tritium
HTO	Tritium Oxide
IAEA	International Atomic Energy Agency
IATA	International Air Transportation Agency
IEMP	Independent Environmental Monitoring Program
ISO	International Organization for Standardization
IT	Information Technology
LCH	Licence Conditions Handbook
LLW	Low-Level Waste
LSC	Liquid Scintillation Counting
LTI	Lost Time Incident
LTRA	Long-term Relationship Agreement
MDA	Minimum Detectable Activity
MW	Monitoring Well
NCR	Non-Conformance Report
NEW	Nuclear Energy Worker
NIST	National Institute of Standards and Technology
NSCA	Nuclear Safety and Control Act
NSPFL	Nuclear Substance Processing Facility Licence

Acronyms and Abbreviations

NSPFOL	Nuclear Substance Processing Facility Operating Licence
OBT	Organically Bound Tritium
OFI	Opportunity for Improvement
OLC	Operating Limits and Conditions
PAS	Passive Air Sampler
PDP	Preliminary Decommissioning Plan
PFD	Pembroke Fire Department
PIP	Public Information Program
PLC	Professional Loss Control
PPCC	Pembroke Pollution Control Centre
PUTT	Pyrophoric Uranium Tritium Trap
QA	Quality Assurance
QC	Quality Control
RDU	Remote Display Unit
REGDOC	Regulatory Document
RPD	Relative Percent Difference
RW	Residential Well
SAR	Safety Analysis Report
SASC	Special Annual Sampling Campaign
SAT	Systematic Approach to Training
SCA	Safety and Control Area
SN	Serial Number
SRBT	SRB Technologies (Canada) Incorporated

Acronyms and Abbreviations

Sv	Sievert • mSv → millisievert • µSv → microsievert
T2	Molecular Tritium Gas
TDG	Transportation of Dangerous Goods
TNA	Training Needs Analysis
UL	Underwriters Laboratories
VLLW	Very Low-Level Waste
WHMIS	Workplace Hazardous Materials Identification System
WHSC	Workplace Health and Safety Committee
WMP	Waste Management Program
WSIB	Workplace Safety and Insurance Board

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1. Introduction

1.1 General Introduction

For the period of January 1 – December 31, 2022, SRB Technologies (Canada) Inc. (SRBT) operated a tritium processing facility in Pembroke, Ontario, under the following licences issued by the Canadian Nuclear Safety Commission (CNSC):

- January 1 – June 30: NSPFOL-13.00/2022[1]
- July 1 – December 31: NSPFL-13.00/2034[2]

After holding a virtual one-day public hearing on April 27, 2022[3], the Commission renewed the SRBT operating licence for a period of 12 years, with the record of decision[4] being signed by the President of the Commission on June 22, 2022.

The facility was operated in compliance with the regulatory requirements of the *Nuclear Safety and Control Act* (NSCA), our operating licence, and all other applicable federal, provincial and municipal regulations throughout the review period. As well, no new CNSC-licensed activities were implemented since the previous compliance monitoring report.

Compliance was ensured by the continued implementation of our Management System and associated programs and procedures, coupled with a high level of independent internal and external oversight through audit and inspection activities.

During this period, there were no exceedances of environmental or radiation protection action levels, nor licence / regulatory limits associated with our operating licence. No events occurred during the year which were deemed to meet criteria for reporting to CNSC staff.

The SRBT operating licence[2] includes conditions that require SRBT to prepare and submit an annual compliance report (ACR). This requirement is currently defined as part of the compliance verification criteria (CVC) in the Licence Conditions Handbook (LCH)[5] relating to condition 3.2 of NSPFL-13.00/2034, which states:

> ***Annual Reporting***
>
> *The licensee shall submit an annual compliance report by March 31 of each year, covering the operation for the 12-month period from January 1 to December 31 of the previous year that meets the requirements of section 3 of REGDOC-3.1.2.*

The purpose of this report is to provide the required information in order to meet the requirements of conditions 3.2 of Licence NSPFL-13.00/2034, and the CVC in the associated LCH.

The information is reported in a format which meets the requirements of CNSC Regulatory Document 3.1.2, *Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills,* SRBT's Regulatory Reporting Program, and in consideration of regulatory feedback and comments regarding previous ACRs submitted in the past.

Where possible, information is presented in the most appropriate section / safety and control area (SCA), in such a way as to avoid duplication in other sections.

1.2 Facility Operation – Compliance Highlights and Significant Events

SRBT conducted its licenced activities safely and compliantly throughout 2022.

1.2.1 Tritium Processing

In 2022, SRBT conducted 4,194 tritium processing operations (light source filling), with a total of 26,940,372 GBq of tritium being processed into gaseous tritium light sources (GTLS).

Please refer to section 1.4, ‘Production or Utilization’ for additional details on tritium processing in 2022.

1.2.2 Distribution of Self-luminous Safety Products

In 2022, 761 shipments of our self-luminous safety products were made to customers in 21 different countries, including Canada.

Please refer to section 4.8, ‘SCA – Packaging and Transport of Nuclear Substances’ for additional details on the distribution of our products in 2022.

1.2.3 Acceptance of Expired Products

In 2022, a total of 15,492 expired (or otherwise removed from service) self-luminous safety ‘EXIT’ type signs were accepted by SRBT from Canadian and American sources, representing a total activity of 2,116.61 TBq of tritium. In 2021, 24,510 signs were processed representing 3,767.75 TBq of tritium.

These signs were disassembled safely and the light sources removed. A very small number of these signs were evaluated as having light sources that could be reused in other self-luminous devices. Lights that could not be repurposed were packaged and shipped to a licenced radioactive waste management service provider.

As well, an additional 212.16 TBq of tritium was accepted from international origins (i.e. other than Canada and the United States) in the form of expired tritium illuminated devices, such as aircraft signs, dials, gauges and other smaller equipment. These were also processed for shipment to a licenced waste management facility.

Please refer to section 4.5, ‘SCA – Waste Management’ and section 4.8, ‘SCA – Packaging and Transport of Nuclear Substances’ for additional details on the acceptance of expired self-luminous safety signs in 2022.

1.2.4 External Oversight

During the year, there were a total of ten major inspections or audits conducted by stakeholders and external parties on our operations.

CNSC staff conducted compliance inspections on two occasions in 2022; an inspection was conducted in October, focused on Security and an inspection was conducted in November focused on Packaging and Transport. No risk-significant findings or non-compliances were identified through either inspection activity.

BSI Management Systems, on behalf of the International Organization for Standardization (ISO), conducted a major audit of SRBT operations in September 2022.

BSI concluded that SRBT continues to effectively manage our operations in a fashion that ensures the elements of the scope of our certification with ISO 9001 are effectively addressed, and confirmed our certification to the 2015 version of ISO 9001.

One major customer of SRBT products conducted an independent audit of our operations in November 2022, while Underwriters Laboratories (UL) completed four quarterly audits as planned.

Additional details on the above noted external oversight of SRBT operations can be found in section 2.1, ‘SCA – Management System’.

Two focused facility inspections were conducted relating to fire protection. Both the Pembroke Fire Department (PFD) and Professional Loss Control (PLC) inspected the facility in 2022.

Details on fire protection-related inspections and audits can be found in section 4.4, ‘SCA – Emergency Management and Fire Protection’.

1.2.5 Internal Oversight

Twelve internal compliance audits were conducted through the year, focused on all aspects of our operations and our organization. A total of fourteen non-conformance reports and twenty-eight opportunities for improvement were identified as a result of these activities, all of which have been addressed (or are in the process of being addressed) by the responsible managers.

Additional details on internal oversight of SRBT operations can be found in section 2.1, ‘SCA – Management System’.

1.2.6 Reported Events

SRBT did not experience any events that met the regulatory criteria for unplanned event reporting in 2022. Event reporting is governed by the SRBT Regulatory Reporting Program.

1.2.7 Operational Challenges

SRBT continued to experience challenges introduced by the onset of the COVID-19 pandemic.

Restrictions on visitor access to the facility continued to be enforced throughout the year, and staff continued to be updated on changing expectations on not attending work if they experienced symptoms of COVID-19.

1.2.8 Summary of Significant Modifications

No significant modifications were implemented in the facility which pertain to our licensed activities in 2022, and there were no changes to the self-luminous safety light production capacity of the facility.

All minor and non-safety significant modifications to structures, systems and components were conducted in accordance with our change control processes.

Please refer to section 3.2, ‘SCA – Physical Design’, for more information regarding notable facility modifications carried out in 2022.

1.2.9 Summary of Organizational Structure and Key Personnel

At the conclusion of 2022, SRBT employed 40 employees and managers. No structural changes to the organization were implemented in 2022.

Please refer to section 2.1, ‘SCA – Management System’ for details regarding SRBT’s organizational structure in 2022.

1.3 Summary of Compliance with Licence and OLCs

Throughout 2022, SRBT complied with the conditions of our operating licence[1,2], and possessed, transferred, used, processed, managed, stored and disposed of all nuclear substances and radiation devices related to and arising from the operation of the facility in compliance with regulatory requirements.

Specifically:

- All required programs have been implemented and maintained,
- The CNSC was notified as required of changes to the programs, processes and documents referenced in the management system / licensing basis,
- All required records have been established and maintained pursuant to the operating licence, the *Nuclear Safety and Control Act* and its regulations,
- All pertinent notifications were made, and written reports filed, within prescribed periods,
- An accepted decommissioning strategy continues to be maintained for future use,
- An accepted financial guarantee continues to be maintained for future decommissioning.
- Cost recovery fees were paid on time and in full, and
- Limits on releases of tritium to the atmosphere and sewer, and radiation dose limits to the public and SRBT nuclear energy workers were not exceeded.

SRBT also remained in compliance with requirements of all other federal and provincial regulations as pertaining to the operation of the facility, including the Canada Labour Code and associated regulations, as well as provincial regulations with respect to the management of hazardous materials and waste.

The following summary report is provided respecting SRBT compliance with the Operating Limits and Conditions (OLC) established within our Safety Analysis Report[6] (SAR) throughout the course of 2022.

Each applicable OLC is repeated below, with a statement of compliance.

1.3.1 Tritium Possession Limit

SRBT is authorized by licence to possess up to 6,000 TBq of tritium in any form.

SRBT possessed less than 6,000 TBq of tritium at all times during 2022.

Please refer to section 2.3, ‘SCA – Operating Performance’ for more details.

1.3.2 Tritium Processing – Permitted Hours of Operation

Tritium processing operations consist of filling and sealing of gaseous tritium light sources (GTLS) on processing rigs, laser cutting of GTLS, or bulk splitting operations. Tritium processing operations are restricted to 0700h – 1900h, seven days a week, unless specifically approved by senior management.

From January 1 – June 13, 2022, all tritium processing operations were conducted between the hours of 0700h and 1900h. No tritium processing operations occurred outside of this time period.

Beginning on June 14, 2022, Senior Management formally approved tritium processing operations to commence at 0600h, adding one hour of potential processing time to each operating day. No tritium processing operations occurred outside of this time period.

This authorization was granted in order to accommodate a more flexible scheduling arrangement with workers, and to help optimize production throughput during a period of high product demand.

This change has remained in place for the remainder of the calendar year, and into 2023. This change in work scheduling does not result in any safety-related impact on workers, members of the public or the environment.

Originally, the 0700h – 1900h operating time period was enacted in order to align operating hours with the chosen 12-hour time period used in establishing the meteorological parameters which form an input of the facility derived release limits (DRL), such as average wind speed and direction.

As the release limits for gaseous effluent established for the facility are not related to the calculated DRLs (rather, they are established at far lower levels intended to ensure protection of groundwater resources), there are no significant technical or safety-related reasons to restrict operations to this time period.

With the release of revision 4 of the SRBT Safety Analysis Report (SAR) in 2017, SRBT elected at that time to keep this OLC in place as an additional layer of conservatism and control, with a condition that Senior Management may authorize operation outside of this time period if warranted.

The next revision of the SRBT SAR is scheduled to be submitted to CNSC staff in July 2023, where it is expected that this specific OLC will be removed at that time, as it does not have any impact on the safety of facility operations.

1.3.3 Tritium Processing – Precipitation

Tritium processing shall not occur during measurable periods of precipitation, as detected by the precipitation detection system or equivalent.

Tritium processing operations were only conducted during periods where measurable precipitation was not occurring during 2022.

Processing operations were ceased and equipment placed into a safe state when precipitation events occurred during operating hours.

1.3.4 Tritium Releases to Atmosphere – Tritium Oxide

SRBT shall not release in excess of 6.72E+13 Bq of tritium oxide to atmosphere in any year.

The total amount of tritium oxide (HTO) released to atmosphere in 2022 was equal to 8.82E+12 Bq (8,816 GBq), representing 13.1% of this licenced limit.

Please refer to section 4.3 ‘SCA – Environmental Protection’ for more details.

1.3.5 Tritium Releases to Atmosphere – Tritium Oxide + Elemental

SRBT shall not release in excess of 4.48E+14 Bq of total tritium as tritium oxide and tritium gas to atmosphere in any year.

The total amount of combined HTO and elemental tritium (HT) released to atmosphere in 2022 was equal to 2.66E+13 Bq (26,590 GBq), representing 5.9% of this licenced limit.

Please refer to section 4.3 ‘SCA – Environmental Protection’ for more details.

1.3.6 Minimum Differential Pressure Measurements for Tritium Processing

Tritium processing operations shall not occur unless the following differential pressures are achieved, as measured by the gauges on each of the active ventilation system stacks:

- Rig Stack: 0.27 inches of water column
- Bulk Stack: 0.38 inches of water column

These measurements correspond to an average effective stack height of 27.8 metres, assuming a wind speed of 2.2 m/s.

At no time did tritium processing occur during 2022 when the noted differential pressures were not being achieved, as measured daily prior to operations commencing.

1.3.7 Tritium Releases to Sewer – Water-soluble Tritium

SRBT shall not release in excess of 2.00E+11 Bq of water-soluble tritium to the municipal sewer system in any year.

The total amount of water-soluble tritium released to the municipal sewer in 2022 was equal to 1.49E+09 Bq, representing 0.74% of this licenced limit.

Please refer to section 4.3 ‘SCA – Environmental Protection’ for more details.

1.3.8 PUTT Filling Cycles

Any pyrophoric uranium tritium trap (PUTT) base is limited to 30 complete bulk splitter filling cycles, after which it is no longer permitted to be used for further tritium processing.

All tritium processing in 2022 was conducted using PUTTs that had been cycled 30 times or less on the bulk splitter.

1.3.9 PUTT / Bulk Container Tritium Loading Limit

PUTTs are limited to less than 111,000 GBq of tritium loading at any time.

Bulk containers are limited as follows:

- SRBT shall request no more than 925,000 GBq per bulk container when submitting a purchase order to an approved supplier of tritium gas.
- No bulk container shall exceed 1,000,000 GBq of tritium loading at any time.

In 2022, no PUTT was loaded with more than 111,000 GBq of tritium.

No bulk container was used in the facility in excess of the 1,000,000 GBq loading limit.

1.3.10 Bulk Container Heating Limit

Bulk tritium containers are limited to a heating temperature of approximately 550°C, as measured by the thermocouple placed between the heating band and the container surface.

Brief and small exceedances of this value are tolerable so long as they are not sustained, and the temperature is returned below this value as soon as possible.

Bulk tritium container heating operations were conducted in compliance with this limit throughout 2022.

1.3.11 On-site Depleted Uranium Inventory

The on-site physical inventory of depleted uranium (virgin, in use and decommissioned bases) is limited to 10 kg.

The on-site inventory of depleted uranium did not exceed 10 kg in 2022.

Please refer to section 2.3, ‘SCA – Operating Performance’ for more details on inventory controls of depleted uranium in 2022.

1.3.12 Exceedances of Facility Action Levels

There were no exceedances of radiation protection or environmental protection action levels in 2022.

1.4 Production or Utilization

1.4.1 Tritium Processing

In 2022, at total of 26,940,372 GBq of tritium was processed. This represents a decrease of about 8.3% from the 2021 value of 29,392,257 GBq.

The following table is presented to illustrate the five-year history of tritium processing at SRBT.

TABLE 1: TRITIUM PROCESSED – FIVE-YEAR TREND

YEAR	2018	2019	2020	2021	2022
TRITIUM PROCESSED (GBq)	31,251,329	30,327,048	27,887,498	29,392,257	26,940,372

1.4.2 Tritium Possession

SRBT is restricted by licence to possess no more than 6,000 TBq of tritium in any form at the facility at any time.

Throughout 2022 this possession limit was not exceeded. The maximum tritium activity possessed at any time during 2022 was 3,500 TBq, in October. The monthly average inventory of tritium in the facility was 2,845 TBq.

At all times, unsealed source material was stored on tritium traps or in the handling volumes of tritium processing equipment.

The monthly data of tritium activity on site during calendar year 2022 can be found in **Appendix A** of this report.

1.5 Changes in Management System Documentation

In 2022, SRBT revised several key program-level management system documents associated with our licensing basis, following the change control provisions of our Licence Conditions Handbook.

Examples of revised programs and procedures that were submitted to CNSC staff for acceptance in 2022 include the Effluent Monitoring Program, Maintenance Program and Waste Management Program.

In line with our mission and policy of continual improvement, process and procedure assessment and associated revision continued to be a managerial focus throughout the year.

In total, 39 Engineering Change Requests were generated to control the revision and review of programs, procedures or forms in 2022.

Specific details on the changes in documentation can be found in section 2.1, ‘SCA – Management System’.

2. Management SCAs

2.1 SCA – Management System

Throughout 2022, the SRBT Management System was effectively and thoroughly implemented, ensuring that our nuclear substance processing facility operations continued to meet the requirements detailed in our LCH[5], including key elements such as organization and responsibilities, capability of personnel, use of experience, work planning and control, process and change control, independent verification, non-conformance and corrective action.

A total of 38 non-conformance reports (NCR) and 72 opportunities for improvement (OFI) were raised in different areas of the company operations.

As of the end of 2022, 20 out of the 38 NCRs raised in 2022 had been addressed, reviewed for effectiveness and closed. The remaining 18 NCRs are still in progress due to the fact that they were raised in the later part of the year, or due to relative longer timeframes for the actions that are to be taken to resolve the issues identified.

For OFIs, 38 out of the 72 raised in 2022 have been addressed, reviewed for effectiveness and closed. The remaining 34 OFIs were either raised later in the year, and/or were assigned target completion due dates that have not yet been reached, and will be reviewed as per normal processes as they are addressed.

SRBT affirms that corrective actions and opportunities for improvement have been effective at resolving problems and promoting the concept of continual improvement within our management system in 2022.

Organizational Management Reviews were conducted in early 2022 by all program owners and responsible managers, including benchmarking and self-assessment activities. These reviews were focused on the 2021 calendar year. Reports were submitted to the Executive Assistant in preparation for the annual Management Review.

Between September 7th and 8th, the annual Management Review was conducted by way of a series of one-on-one meetings between key members of the Executive Committee and each of the individual program owners and responsible managers.

The results of the benchmarking and self-assessment activities performed for the previous calendar year were reviewed and discussed, and areas where improvements could be made in the various company safety programs were highlighted.

The management system was found to be effective at meeting the current requirements of the NSCA, associated regulations and the conditions of the operating licence, as well as ISO 9001:2015, and customer requirements.

The 2022 Organizational Management Reviews are scheduled to take place in the second quarter of 2023, followed by Senior Management meetings to discuss the outputs of the reviews with responsible managers, and the identification of any opportunities for improvements, actions required to mitigate risks, and compliance or performance issues.

2.1.1 Staffing and Organization

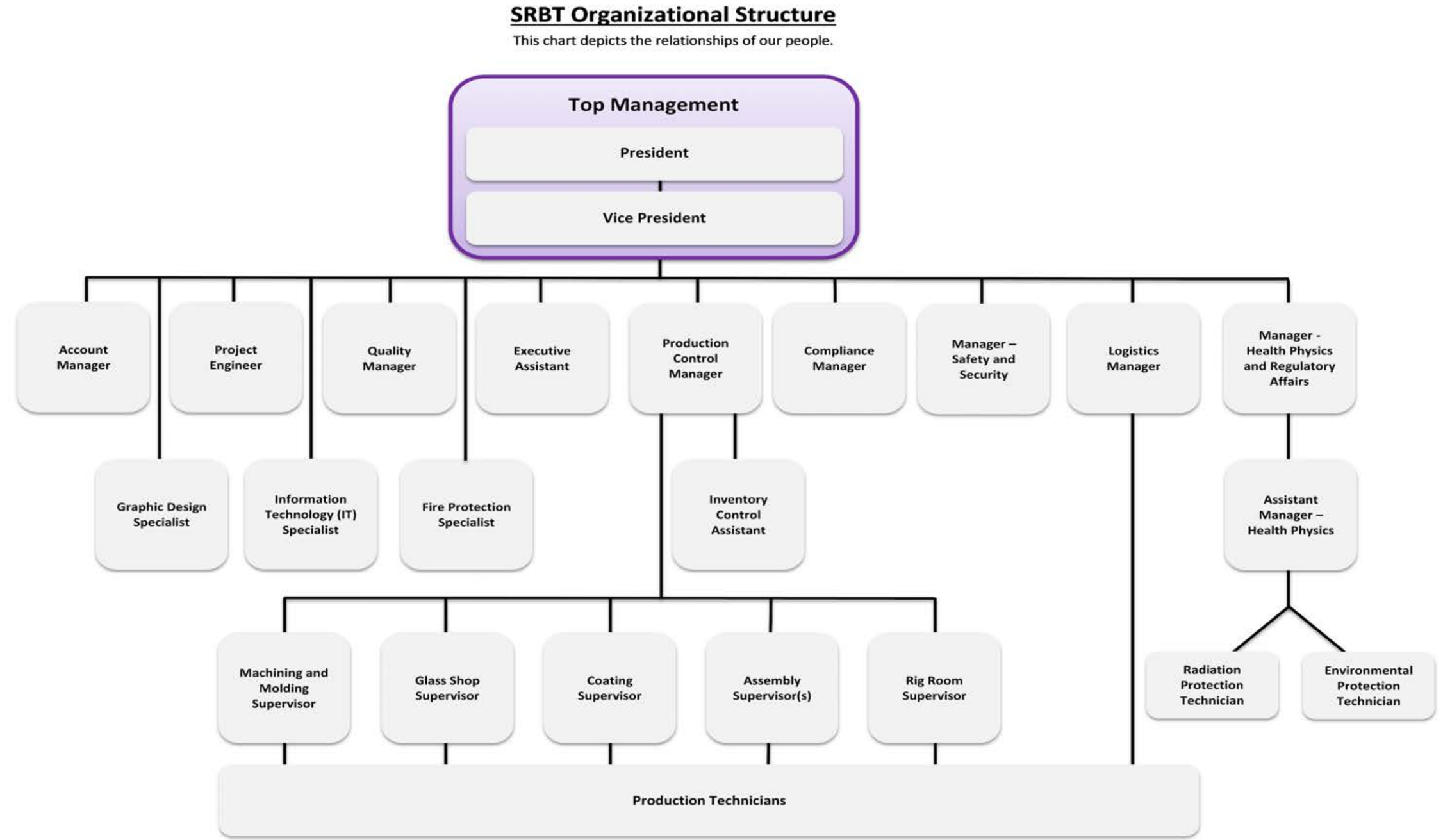
At the beginning of 2022, SRBT total staff complement stood at 39 employees.

Three new employees were hired during the year, while one employee retired and another employee left the employ of the company in 2022.

As of the end of 2022, the total working staff complement stood at 40 employees.

The organizational chart in Figure 1 represents the structure of the company, as of the end of 2021, that ensures SRBT meets *the Nuclear Safety and Control Act*, regulations and conditions of our operating licence.

FIGURE 1: ORGANIZATIONAL CHART



Sixteen administrative employees and twenty-four production / technician-level employees work at SRBT at the conclusion of the year.

Administrative employees include the two members of Top Management:

- President has the overall responsibility for the facility and ensures that all licensing requirements are met.
- Vice President assumes the full duties of the President in his absence or otherwise assists the President's in his duties.

At the conclusion of 2022, the administrative employees also include nine individuals at the Organizational Management level:

- Quality Manager is mainly responsible for ensuring the quality of products, the satisfaction of customers. They also provide input ensuring that our management system meets the requirements of the ISO 9001 standard.
- Logistics Manager is mainly responsible for the shipment, receipt and inventory control of radioactive materials, as well as import and export activities.
- Executive Assistant is mainly responsible for providing administrative support to the President, and for ensuring meeting minutes are recorded.
- Production Control Manager is mainly responsible for all company purchasing and production planning activities, and the distribution of work packages.
- Project Engineer is mainly responsible for developing and maintaining product specifications and manufacturing procedures, product research and development, and oversight of the change control process.
- Account Manager is mainly responsible for all company accounting activities.
- Manager – Safety and Security is mainly responsible for ensuring staff health and safety and ensuring compliance with the health and safety provisions of the *Canada Labour Code,* the *Canada Occupational Health and Safety Regulations*, and support for the Security Program.
- Compliance Manager is mainly responsible for performing independent internal audits and further ensuring facility compliance with external and internal requirements.

- Manager of Health Physics and Regulatory Affairs is mainly responsible for oversight of all company Health Physics activities, as well as communicating with CNSC staff on regulatory matters.

Five employees provide program oversight and/or directly assist individuals at the management support level,

- Graphic Design Specialist is responsible for coordinating changes to the company website, and for the design and development of public information products and sales literature.
- IT Specialist manages and maintains the facility computer network and provides a wide range of technical and engineering support.
- Fire Protection Specialist ensures that facility fire safety procedures are implemented, and for coordinating with the PFD for drills, inspection and training. This individual is also responsible for the day-to-day management of maintenance activities in the facility.
- Inventory Control Assistant oversees the receipt of all materials, including quality evaluation where applicable, and for general stores and materials.
- Assistant Manager – Health Physics is responsible for the day-to-day implementation of company Health Physics-related programs and processes, including coordinating the activities of technician-level resources assigned to the department.

At the technician level, there are two technician-level organizational positions within the Health Physics department:

- Environmental Protection Technician is primarily responsible for performing duties relating to environmental protection and monitoring.
- Radiation Protection Technician performs duties relating primarily to radiation protection.
    - *NOTE: as of the end of 2022 this position was unstaffed; all responsibilities are being shared between the Assistant Manager – Health Physics and the Environmental Protection Technician, under the oversight of the Manager – Health Physics and Regulatory Affairs.*

Twenty-three production-focused employees include six Production Supervisors:

- Glass Shop Supervisor is responsible for all the activities within the Glass Shop Department.
- Coating Supervisor is responsible for all the activities within the Coating Department.
- Rig Room Supervisor is responsible for all the activities within the Rig Room Department.
- Assembly Supervisors (2) are responsible for all the activities within the Assembly Department.
- Machining and Molding Supervisor is responsible for all the activities within the Machining and Molding Department.

These supervisors oversee the work of sixteen Production Technicians, who are responsible for performing production activities in accordance with company manufacturing procedures.

2.1.2 Committees

In 2022, committees have continued to be instrumental in the development and refinement of company programs and procedures, identifying new safety initiatives and ensuring continuing effective communication at all organizational levels.

Committees use meeting results as an opportunity for improvement and make recommendations accordingly. In 2022, a total of 73 committee meetings took place at the company compared to 99 in 2021, and 77 in 2020.

See Table 2 for a breakdown of the meetings held in 2022.

Committee meetings continue to be a key force to improve all aspects of our operations, and safety in general.

TABLE 2: COMMITTEE MEETINGS

COMMITTEE	NUMBER OF MEETINGS
PRODUCTION COMMITTEE	37
WORKPLACE HEALTH AND SAFETY COMMITTEE	12
HEALTH PHYSICS COMMITTEE	4
OTHER COMMITTEE / STAFF MEETINGS	3
MAINTENANCE COMMITTEE	3
TRAINING COMMITTEE	3
FIRE PROTECTION COMMITTEE	3
MITIGATION COMMITTEE	2
WASTE MANAGEMENT COMMITTEE	2
PUBLIC INFORMATION COMMITTEE	2
EXECUTIVE COMMITTEE	1
SAFETY CULTURE COMMITTEE	1
TOTAL	**73**

2.1.3 Review of Quality Assurance and Management System Effectiveness

The SRBT management system is subject to both focused periodic reviews, as well as continuous review and improvement.

An internal audit of the SRBT management system is conducted annually. In 2022, this audit yielded no safety-significant findings.

Based upon the following factors, and the information presented in this report, it is concluded that the SRBT management system has been effective throughout the year:

- The Commission renewed the facility operating licence for a period of 12 years in June of 2022,
- A very low frequency of lost-time injuries or incidents occurring in 2022,
- All workplace injuries were relatively minor in nature,
- Highest worker dose for 2022 is less than 1% of the regulatory limit,
- Maximum calculated public dose remains less than 1% of the regulatory limit for persons who are not nuclear energy workers,
- Continued low ratio of tritium released vs. processed,
- Gaseous tritium oxide releases were 13.1% of authorized limits, while combined oxide and elemental tritium releases were 5.9% of authorized limits,
- Tritium releases via liquid effluent were less than 1% of authorized limits,
- All conditions of our facility operating licence met throughout the year,
- Very few open CNSC compliance actions as of the end of 2022, all of which were from recent inspection activities,
- Continued improvement of several key programs and processes, and
- Continuous registered certification to the latest revision of the ISO 9001 standard.

2.1.4 Audit Summary – Internal

The goal of SRBT's internal auditing process is to ensure that all licensed activities and company safety programs and procedures are being adhered to.

Internal audits are often specifically focused on the safety and control areas established by the CNSC.

The Compliance Manager implemented an audit schedule for 2022 that touched on several aspects of our operations. A total of twelve internal audits were scheduled and completed.

Internal audits were focused on the following areas of our operations:

- Finance Department
- Management System
- Maintenance
- Materials/Production Control
- Emergency Management and Fire Protection
- Quality Department
- Public Information Program and Financial Guarantee
- Radiation Protection and Dosimetry Service
- Environmental Protection - Groundwater Monitoring Program
- Shipping and Nuclear Substances Inventory Control
- Health and Safety, and
- Production Departments

For 2023, a total of eight internal audits are included on the approved schedule.

Internal audits resulted in 14 non-conformances (NCR) and 28 opportunities for improvement (OFI) being identified in 2022. Actions have been established and tracked in each case in order to drive compliance and continuous improvement.

2.1.5 Audit Summary – External

During the year, there were a total of ten major inspections or audits conducted by stakeholders and external parties on our operations.

2.1.5.1 CNSC Inspections (2)

CNSC staff conducted compliance inspections at SRBT on two occasions in 2022.

In October, CNSC staff conducted a compliance inspection focused on the Safety and Control Area of Security. The inspection was conducted on-site over the course of one day.

Although specific details on Security inspection results are protected, it can be stated that no major issues were identified as a result of this inspection, and that the program was found to meet CNSC staff expectations.

In November, CNSC staff conducted a compliance inspection focused on the Safety and Control Area of Packaging and Transport. The inspection was conducted in a hybrid fashion, with both in-person and remote attendance by members of the CNSC inspection team.

As of the end of 2022, the inspection report remains outstanding; however, based on the preliminary summary of findings shared with SRBT at the conclusion of the inspection, no major non-compliances were found, and any issues identified present very low safety significance, and are expected to be resolved quickly and effectively.

2.1.5.2 ISO Certification Audits (1)

On behalf of the International Organization for Standardization (ISO), BSI Management Systems conducted an audit of SRBT operations related to the quality management system on September 14 -15, 2022, as part of the maintenance of SRBT’s ISO 9001 certification.

Through the audit, SRBT was successful in maintaining continued certification. One opportunity for improvement was identified.

2.1.5.3 Customer-Led Audits (1)

In November 2022, an external audit was executed by a major customer of our commercial safety signs. The audit was a product-focused quality audit of our facility.

No findings were identified through this audit, which was conducted remotely due to the continued challenges of the COVID-19 pandemic.

2.1.5.4 Underwriters Laboratories (4)

Underwriters Laboratories (UL) provides safety-related certification, validation, testing, inspection, auditing, advising and training services to a wide range of clients, including manufacturers.

UL performs quarterly visits of our facility. These visits are unannounced, and provide assurance that our UL-listed products are manufactured using the materials, procedures and testing parameters required under the specific UL listing.

In 2022, UL performed inspections on February 3, May 5, August 2 and November 29. One variation notice was issued in November 2022 which has been formally addressed.

On-site inspections resumed in May 2022 therefore, three of the four inspections were conducted with the UL representative being at the facility in person.

2.1.5.5 Fire Protection Inspections (2)

Two focused facility inspections / audits were conducted in 2022 relating to fire protection by parties other than SRBT.

The Pembroke Fire Department inspected the facility in October, with no violations being identified.

An external fire protection consultant (PLC) conducted a N393-compliant site condition inspection in October. The inspection report showed one new finding and one opportunity for improvement. The finding was dispositioned accordingly.

Details on these inspections can be found in section 4.4, ‘SCA – Emergency Management and Fire Protection’.

2.1.5.6 SRBT Audits of Suppliers, Manufacturers or Service Providers

In 2022, SRBT did not perform an audit of any supplier, manufacturer or service provider. Due to the ongoing COVID-19 pandemic, no external audits of suppliers were planned or scheduled. Looking forward, supplier audits have been planned and incorporated into the 2023 audit schedule.

2.1.6 Benchmarking and Self-assessments

In 2022, individuals responsible for specific programs and procedures at SRBT regularly looked at process problems, corrective actions as well as trending and used this information to benchmark elsewhere in or out of the organization in order to improve the effectiveness of these programs and procedures and to help define where improvements could be made.

Benchmarking against other similar CNSC licensees is encouraged. Documents describing the performance of similar CNSC licensees are made available for review, including:

- Commission Member Documents
- Proceedings, Including Reasons for Decision
- Documents from other licensees, including annual compliance reports

Self-assessments are also performed by Organizational Managers to identify, correct and prevent problems that hinder the achievement of the company's vision, mission, goals, values and policy and to assess the adequacy and effectiveness of the Quality Management System.

Self-assessments were performed by review of:

- Analysis and trending of performance data against historical data
- Input from stakeholders (public, contractors, regulators, etc.)
- Workplace inspections or observations
- Routine communications with staff to determine whether expectations are understood
- Training and coaching results
- Corrective and preventive actions raised throughout the organization
- Internal audit results

Both Benchmarking and Self-assessment reports formed key inputs into the annual Management Review meetings conducted between September 7-8, 2022.

The scope of these meetings was to fully and critically review our operations for calendar year 2021, to develop actions to address identified issues and risks, and to take advantage of opportunities for improvement.

The 2022 Management Review cycle is scheduled to be completed in the first half of 2023.

2.1.7 Programs and Procedures

2.1.7.1 Programs and Major Licensing Documents

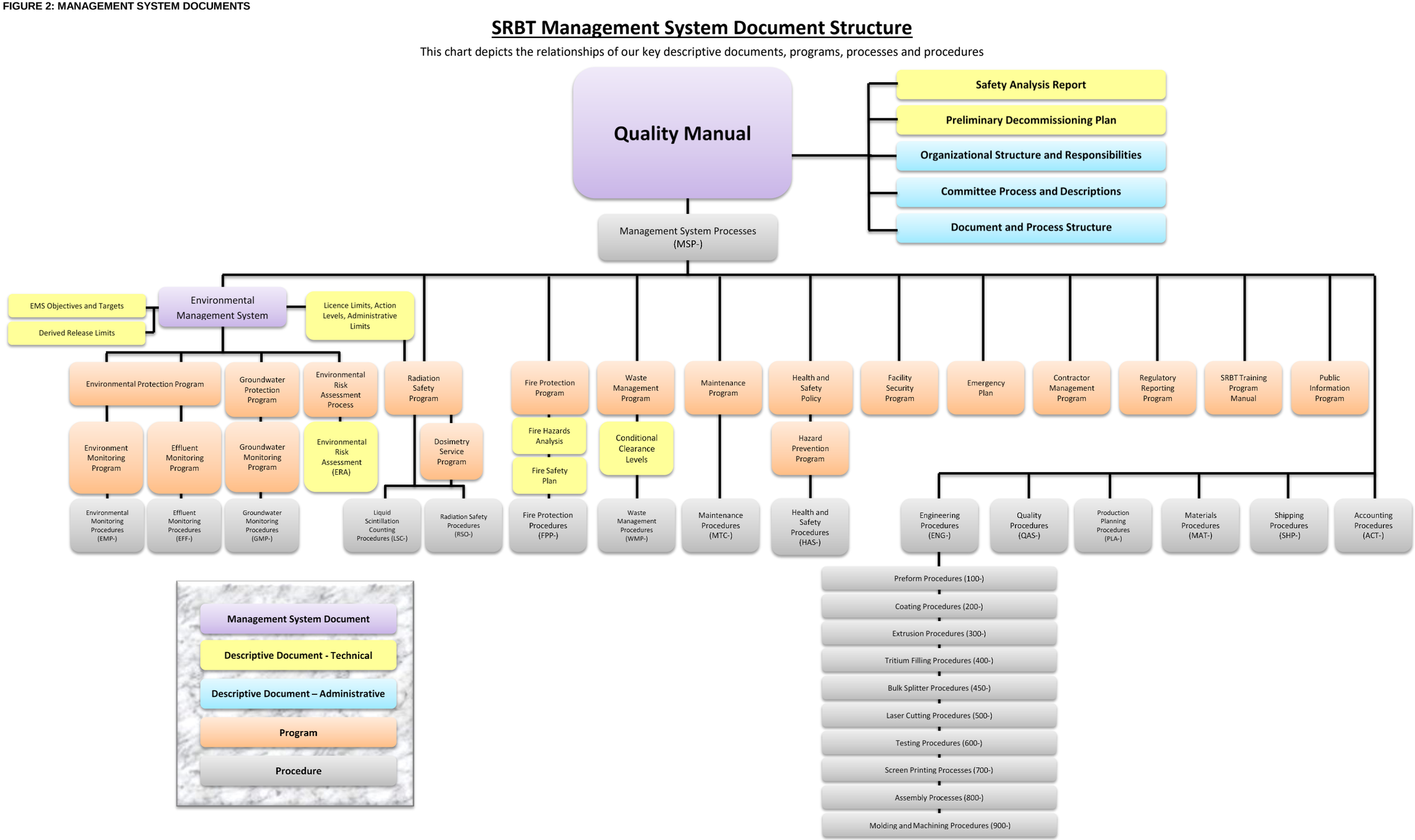
In 2022, several key management system programs, procedures or plans were revised in line with SRBT's mission of continuous improvement:

- A revised Maintenance Program was submitted to CNSC staff on August 15[7]. This revised program document was reviewed and accepted by CNSC staff on September 15[8].
- A revised Effluent Monitoring Program was submitted to CNSC staff on November 11[9]. This revised program document was reviewed and accepted by CNSC staff on December 15[10].
- A revised Waste Management Program was submitted to CNSC staff[11] as a component part of a gap analysis and implementation plan conducted in 2022, fulfilling a commitment made by SRBT as part of the process of licence renewal. The revised program document was reviewed and accepted by CNSC staff on January 17, 2023[12].

2.1.7.2 SRBT Management System Document Hierarchy

Figure 2 illustrates the Management System document hierarchy in place as of the end of 2022.

FIGURE 2: MANAGEMENT SYSTEM DOCUMENTS



2.1.7.3 Management System Changes

In 2022, a total of 39 Engineering Change requests (ECR) were filed relating to procedural or program changes in the SRBT management system.

The breakdown of program-related ECRs filed in 2022 is presented in Table 3 below:

TABLE 3: PROCEDURAL ECR SUMMARY

PROGRAM / AREA	NUMBER OF ECRs
CONVENTIONAL HEALTH AND SAFETY	9
ENGINEERING	6
QUALITY	4
MANAGEMENT SYSTEM	4
WASTE MANAGEMENT	4
FIRE PROTECTION	3
RADIATION SAFETY	3
MAINTENANCE	2
SHIPPING AND RECEIVING	2
ENVIRONMENTAL MONITORING AND PROTECTION	1
EFFLUENT MONITORING	1
TOTAL	**39**

Note that where appropriate, one ECR may encompass more than one procedural improvement.

Procedural or programmatic changes were implemented for a variety of purposes. Many improvements have been incorporated as a result of the continuing, expanded oversight provided by SRBT’s internal audit processes, as well as a dedicated managerial focus on improvement initiatives in each area.

2.2 SCA – Human Performance Management

Throughout the course of 2022, SRBT ensured the programs that manage human performance were implemented effectively, and the interfaces between these programs and other aspects of our management system were maintained and executed. At all times a sufficient number of qualified workers were available to carry out licenced activities in a safe manner, and in accordance with regulatory requirements and SRBT safety programs.

In 2022, SRBT employed a total of 42 staff members, including one seasonal employee. Three new employees were hired in 2022, while one employee retired and one left the company. By the end of 2022 there were a total of 40 employees.

At the end of 2022 the average experience of our workforce stands just over 13 years, with an average age of just under 43 years old.

The Health Physics Team, comprised of five members (compared to six in 2021) possesses a combined 86 years of work experience with the company, while production supervisors average just under 25 years of experience with SRBT.

Careful consideration continues to be taken when appointing new staff to ensure continued nuclear safety. The activities of four work areas (marked in yellow in Table 4) do not involve tasks that affect nuclear safety.

TABLE 4: NUCLEAR SAFETY TASKS PERFORMED PER WORK AREA

WORK AREA	AVERAGE EXPERIENCE (IN YEARS)	RESPONSIBLE FOR PROGRAMS AND PROCEDURES THAT AFFECT NUCLEAR SAFETY	PROCESS TRITIUM	HANDLE SEALED TRITIUM SOURCES
ADMINISTRATION	**19.42**	✓	-	-
GLASS SHOP	**16.25**	-	-	-
MACHINING AND MOLDING	**15.85**	-	-	-
RIG ROOM	**10.83**	-	✓	✓
ASSEMBLY	**10.65**	-	-	✓
SHIPPING	**9.58**	-	-	-
COATING	**6.51**	-	-	-

Generally, employees hired as Production Technicians are first appointed to one of these four work areas. These positions do not in any way impact the company's ability to ensure that the requirements of the *Nuclear Safety and Control Act*, Regulations and conditions of the licence[2] and LCH[5] are met.

The Rig Room is the work area where tritium gas is processed into GTLS. The average work experience of the staff within this department is just over 10 years. The Supervisor in this department has over 31 years of experience and performs or oversees all activities that involve tritium processing or handling of tritium sources.

The Assembly Department is where tritium sources are handled by staff for assembly into products or for packaging. The tritium is contained in the source at this stage and the possibility of tritium exposure is low. The Supervisor in this department has over 31 years of experience, and performs or oversees all activities of other staff members.

As a result of COVID-19 restrictions, Senior Management instituted a night shift in order to reduce the amount of staff at the facility which includes the appointment of a second Supervisor in the Assembly Department who has over 23 years of experience.

The overall performance of the human performance program implemented by SRBT was satisfactory throughout 2022, and several improvements made will serve to continually increase its effectiveness.

2.2.1 Training

2.2.1.1 Annual All-Staff Training Session

Traditionally, once per calendar year, SRBT shuts down all manufacturing operations in order to conduct an all-day, all-staff training session.

The agenda for this training typically incorporates a wide variety of aspects of our operations. The majority of the day is dedicated to a refresher course in radiation protection, specifically oriented at the unique type of hazard present at SRBT.

This training was conducted in three separate groups of trainees over the course of consecutive days in December, and was focused on information with respect to anticipated health effects from radiation exposure, tritium, proper handling of tritium throughout the facility, and equipment for personal radiation protection purposes. All trainees successfully challenged the associated written test for this training.

As well, training segments focused on Conventional Health and Safety, Fire Safety and Emergency Preparedness, Supervisory Awareness Program, and the SRBT Management System were also conducted with all staff.

Finally, a survey on Safety Culture was administered to all staff by the Safety Culture Committee, the results of which will help to continue to maintain and improve a healthy safety culture at the facility.

Based on course evaluation data, the annual all-staff training session provides an excellent opportunity for workers to refresh their training and knowledge on several of the safety-related aspects of working at SRBT.

2.2.1.2 Fire Extinguisher Training

Fire extinguisher training is typically conducted annually for all SRBT employees. The PFD provided this training in November 2022.

2.2.1.3 Fire Protection Specialist Training

The Fire Protection Specialist continues to serve as a volunteer firefighter for a local fire department, and receives fire protection training from this department.

2.2.1.4 TDG Training

Transportation of Dangerous Goods (TDG) training for Shipping department staff is scheduled every two years. The training is conducted by an outside agency with expertise in the transport of dangerous goods.

A session was last conducted on February 18, 2021. Six employees successfully underwent this training at that time, and were TDG-certified. This training was verified by CNSC staff during their inspection activity in November. In line with the schedule of this training, the next TDG training session is scheduled to be held in February 2023.

2.2.1.5 Health and Safety Training

The following training took place in 2022:

- The Manager – Safety and Security attended an off-site seminar titled ‘Mental Stress – WSIB Claims and What You Need to Know’.
- All SRBT employees attended annual training on Workplace Hazardous Materials Information System (WHMIS) in December.

2.2.2 Systematic Approach to Training Program

SRBT continues to implement a systematic approach to training (SAT) as part of our overall training program, and the Training Committee actively ensures that the processes described in the SRBT Training Program Manual are managed effectively and improved on an ongoing basis.

Three meetings of the Training Committee were held in 2022, with the annual program evaluation being held in March, the annual SAT-analysis review taking place in May, and the annual review of the qualification of SAT-based trainers being conducted in November.

There were ten instances where new or modified activities or equipment were brought to the Training Committee for a categorization decision during the year. Nine of these were determined to be eligible for management as Category 1 training activities (non-SAT based), and were assigned to the responsible manager to ensure that training is performed as needed.

One categorized activity was assigned as Category 2, and will be trained in accordance with a systematic approach. The revision of the in-house procedure for preparing the 3605D tritium transport package for shipment will require changes to staff training already given systematically as part of SAT-OP-02, *Bulk Splitter Operations*.

This change is required with the release of modified package instructions by the new package design authority (Croft and Associates in the United Kingdom), and is contingent on the CNSC issuing a new certificate for this Type B(U) container (expected in early 2023), and SRBT registering as a package user.

Qualification management processes continue to ensure that SAT-qualified staff members maintain their skills through frequency of performance requirements, and that the qualification of SAT-based trainers continues to be evaluated periodically. At the conclusion of 2022, a total of eleven individual workers (spanning all organizational levels) are either fully qualified in their area of responsibility, or are in the process of qualification, in at least one of the eight SAT-based activities developed and implemented.

The following table compiles information on the number of qualified workers assigned tasks that are trained in accordance with a SAT-based method at the end of 2022.

TABLE 5: WORKER QUALIFICATION IN SAT-BASED ACTIVITIES

SAT WORK ACTIVITY	FULLY QUALIFIED WORKERS	WORKERS PROGRESSING TOWARD FULL QUALIFICATION
SAT-HP-01: ADVANCED HEALTH PHYSICS INSTRUMENTATION	2	1
SAT-HP-02: LIQUID EFFLUENT MANAGEMENT AND CONTROL	3	0
SAT-HP-03: WEEKLY STACK MONITORING	3	0
SAT-HP-04: BIOASSAY AND DOSIMETRY	3	1
SAT-OP-01: TRITIUM PROCESSING – FILLING AND SEALING LIGHT SOURCES	6	0
SAT-OP-02: BULK SPLITTER OPERATIONS	5	0
SAT-OP-03: HANDLING PUTTS	4	1
SAT-SHP-01: IMPORT AND EXPORT PROCESSES	4	0

Two SAT-based training exams were administered in 2022; both trainees undertook the exam for SAT-HP-04, *Bioassay and Dosimetry* after the classroom-based training was conducted, and achieved passing grades.

Refresher training modules were provided on several occasions, including the annual refresher training for certain infrequently performed work tasks that score high on the difficulty and importance scale (as part of SAT-based task analysis).

The training needs analysis (TNA) process was implemented on eight occasions in response to procedural / program changes, or for new or modified facility equipment. The frequent use of this documented TNA process has been very helpful at ensuring a level of appropriate training is provided to SRBT staff when required, and in maintaining human performance-related issues very low.

2.3 SCA – Operating Performance

SRBT has continued to operate the facility safely and in compliance with our operating licence throughout 2022.

Our programs and processes have continued to evolve to meet or exceed regulatory requirements and expectations, with safety as an overriding priority in all aspects of our licensed activities.

A summary of compliance with operational limits and conditions can be found under section 1.3 of this report, while a summary of annual production / utilization data can be found in section 1.4 of this report.

A description of the internal and external audits conducted relating to licensed activities can be found under sections 2.1.4 and 2.1.5 of this report.

2.3.1 Ratio of Tritium Released to Processed

In 2022 our team continued to strive to minimize the amount of tritium released to the environment for every unit of tritium processed – we refer to this as the 'released to processed' ratio. This ratio is an excellent indicator of the overall effectiveness of our emission reduction initiatives.

The following table illustrates how this ratio has trended over the past five years.

TABLE 6: TRITIUM RELEASED TO PROCESSED RATIO FIVE-YEAR TREND (2018-2022)

DESCRIPTION	2018	2019	2020	2021	2022
TOTAL TRITIUM RELEASED TO ATMOSPHERE (GBq/YEAR)	33,180	31,769	25,186	28,729	26,590
TRITIUM PROCESSED (GBq/YEAR)	31,251,329	30,327,048	27,887,498	29,392,257	26,940,372
RELEASED / PROCESSED (%)	**0.11**	**0.10**	**0.09**	**0.10**	**0.10**
CHANGE IN RATIO INCREASE (+) / REDUCTION (-)	+38%	-9%	-10%	+10%	NC

The ratio of tritium released to processed has remained very low and relatively stable for several years, which is indicative of continued safe processing operations.

2.3.2 Objectives and Targets

SRBT performance against key objectives and targets for 2022 is tabled below.

TABLE 7: 2022 PERFORMANCE TARGETS

DESCRIPTION	2022 TARGET	2022 PERFORMANCE
MAXIMUM DOSE TO NUCLEAR ENERGY WORKER	≤ 0.50 mSv	0.46 mSv
AVERAGE DOSE TO NUCLEAR ENERGY WORKER	≤ 0.060 mSv	0.048 mSv
CALCULATED DOSE TO MEMBER OF THE PUBLIC	≤ 0.0040 mSv	0.0020 mSv
WEEKLY AVERAGE TRITIUM RELEASES TO ATMOSPHERE	≤ 625 GBq / week	511 GBq
RATIO OF TRITIUM EMISSIONS VS. PROCESSED	≤ 0.11	0.10%
TOTAL TRITIUM EMISSIONS EFFLUENT PATHWAY	≤ 10 GBq	1.49 GBq
ACTION LEVEL EXCEEDANCES ENVIRONMENTAL	≤ 1	0
ACTION LEVEL EXCEEDANCES RADIATION PROTECTION	≤ 1	0
CONTAMINATION CONTROL FACILITY-WIDE PASS RATE	≥ 95%	97.4%
LOST TIME INJURIES	0	0
MINOR INJURIES REPORTABLE TO WSIB	≤ 5	0
MINOR INCIDENTS / FIRST AID INJURIES (NON-REPORTABLE)	≤ 15	12

Target values are set at the outset of each calendar year by various committees. Data is tracked and trended throughout the year in order to ensure that appropriate measures can be taken where appropriate, in an effort to ensure a high level of safety performance.

Where targets are missed, specific actions are documented and tracked to improve performance where feasible; however, in some cases production considerations can result in effects that were not anticipated when the annual targets were set.

No targets were missed for calendar year 2022.

2.3.3 Reportable Events

SRBT did not experience any events that met the regulatory criteria for unplanned event reporting in 2022. Event reporting is governed by the SRBT Regulatory Reporting Program.

2.3.4 Inventory Control Measures

2.3.4.1 Tritium

SRBT has continuously possessed, transferred, used, processed, managed and stored all nuclear substances related to the operation of our facility in compliance with the requirements of our licence.

A number of inventory control measures are in place to ensure that tritium on site does not exceed the possession limit prescribed by our operating licence.

The maximum amount of tritium possessed by SRBT at any one time during 2022 was 3,500 TBq, which represents 58.3% of the facility possession limit. The average monthly inventory on site was 2,845 TBq.

Tritium on site is found in:

- Bulk containers and tritium traps,
- New light sources,
- New product that contain light sources,
- Work in progress,
- Waste,
- Expired light sources taken out of product,
- Products that contain expired light sources, and
- Non-conforming product.

Refer to **Appendix A** for additional details on tritium inventory in 2022.

2.3.4.2 Depleted Uranium

SRBT possessed a reported 9.597 kg of depleted uranium in metallic form at the beginning of 2022.

This material is used in tritium ‘traps’ as storage media for tritium gas on our processing equipment, a well-understood and widely-used strategy for manipulating and storing tritium in its gaseous, elemental state.

By using depleted uranium in this fashion, we can ensure that the quantity of gaseous tritium being used during any given processing operation is restricted. This helps to ensure that the consequences of any unplanned event are minimized with respect to radiation and environmental protection, by ensuring that any release of tritium is limited.

During the year, one transfer of this material out of the facility was made. Tritium trap bases that are taken out of service are collected and safety stored until a waste shipment is warranted, typically once every three years.

A shipment took place on March 22, 2022, where tritium trap bases containing a total mass of 876 grams of depleted uranium were sent to a licenced facility for further management.

At the conclusion of 2022, the mass of depleted uranium on site is 8.721 kg. A limit of 10 kg of this material in inventory is applied as part of the operating limits and conditions in the SAR.

The breakdown of this inventory at the conclusion of 2022 is as follows:

TABLE 8: DEPLETED URANIUM INVENTORY BREAKDOWN AT THE END OF 2022

QTY	DESCRIPTION	DEPLETED URANIUM IN EACH (GRAMS)	TOTAL DEPLETED URANIUM (GRAMS)
1	LOOSE FORM – CONTAINER 1	N/A	1,127
1	LOOSE FORM – CONTAINER 2	N/A	4,975
9	ACTIVE P.U.T.T.	30 +/- 5 grams	284
13	NON-ACTIVE P.U.T.T.	30 +/- 5 grams	415
6	AMERSHAM CONTAINERS	320	1,920
		TOTAL	**8,721**

2.3.5 Liquid Scintillation Quality Assurance and Control

2.3.5.1 Routine Performance Testing

As a component of SRBT's Dosimetry Services Licence, Routine Performance Testing is performed on both liquid scintillation counters on a quarterly basis, as required by CNSC REGDOC-2.7.2, *Dosimetry, Volume II, Technical and Management System Requirements for Dosimetry Services*.

These quality assurance tests are performed to demonstrate that liquid scintillation counting assays in support of the dosimetry service are operated in a predictable and consistent way.

This testing was carried out every 3 months as required throughout 2022 on each of the two 'TriCarb 2910' units, with no failures reported.

2.3.5.2 Weekly LSC Performance Check

SRBT quality assurance requirements for liquid scintillation counting include weekly instrument performance checks using National Institute of Standards and Technology (NIST) traceable standards of a blank, H-3 and C-14 standards.

All tests have been performed on both TriCarb 2910 Liquid Scintillation Counting (LSC) units, and included an assessment of the instrument efficiency for tritium measurement, the figure of merit, the tritium background measurement, and a chi-square test. An instrument must meet acceptability criteria on a weekly basis, or the unit is removed from service pending corrective maintenance or actions.

2.3.5.3 Assay Quality Control Tests

Reference standards traceable to NIST are prepared in-house, and are analyzed and checked against quality control acceptance criteria with every batch of liquid scintillation counting samples being analyzed.

All tests were performed as required with every assay throughout 2022, in order to ensure quality control of LSC laboratory processes.

3. Facility and Equipment SCAs

3.1 SCA – Safety Analysis

The overall safety case for SRBT continues to be effectively validated and maintained through the implementation of our management system.

Preventive measures and strategies for potential hazards are built into our programs and processes. Key safety processes include independent verification, frequent internal audit and oversight, and management by designated committees.

3.1.1 Operating Limits and Conditions - SAR

Please refer to section 1.3 of the report for a complete assessment of SRBT compliance against the Operating Limits and Conditions in the SAR.

Operating practices and management system processes in 2022 have continued to be conducted in full alignment with the latest version of SRBT's SAR. There were no significant changes to the facility or our operations that had any direct bearing on the safety analysis in 2022.

One minor change was authorized by Senior Management that related to a specific OLC in the SAR – the hours of the day in which tritium processing is authorized to take place.

From January 1 – June 13, 2022, all tritium processing operations were conducted between the hours of 0700h and 1900h. No tritium processing operations occurred outside of this time period, in accordance with the described hours of processing in OLC 10 (b) in Revision 4 of the SRBT SAR, which states:

> *Tritium processing operations consist of the filling and sealing of GTLS on processing rigs, laser cutting of GTLS, or bulk splitting operations.*
>
> *Tritium processing operations are restricted to 0700h – 1900h, seven days a week, unless specifically approved by senior management.*

Beginning on June 14, 2022, Senior Management formally approved tritium processing operations to commence at 0600h, adding one hour of potential processing time to each operating day. No tritium processing operations occurred outside of this time period (0600h – 1900h).

This authorization was granted in order to accommodate a more flexible scheduling arrangement with workers, and to help optimize production throughput during a period of high product demand. This change has remained in place for the remainder of the calendar year, and continues into 2023.

This change in work scheduling does not result in any safety-related impact on workers, members of the public or the environment.

Originally, the 0700h – 1900h operating time period was enacted in order to align operating hours with the chosen 12-hour time period used in establishing the meteorological parameters which form an input of the facility derived release limits (DRL), such as average wind speed and direction.

As the release limits for gaseous effluent established for the facility are not related to the calculated DRLs (rather, they are established at far lower levels intended to ensure protection of groundwater resources), there are no significant technical or safety-related reasons to restrict operations to this time period.

With the release of revision 4 of the SRBT Safety Analysis Report (SAR) in 2017, SRBT elected at that time to keep this OLC in place as an additional layer of conservatism and control, with a condition that Senior Management may authorize operation outside of this time period if warranted.

As described in the following section, the next revision of the SRBT SAR is scheduled to be submitted to CNSC staff in July 2023, where it is expected that this specific OLC will be removed at that time, as it does not have any impact on the safety of facility operations.

3.1.2 REGDOC-2.4.4 and Revising the SRBT SAR

In 2022 the Canadian Nuclear Safety Commission (CNSC) announced the publication of Regulatory Document (REGDOC)-2.4.4, *Safety Analysis for Class IB Nuclear Facilities*.

The current Licence Conditions Handbook (LCH) for the SRBT operating licence (NSPFL-13.00/2034) notes that the applicable guidance document for the safety and control area (SCA) of Safety Analysis is IAEA SSR-4, *Safety of Nuclear Fuel Cycle Facilities*.

In previous correspondence relating to the licence renewal process, CNSC staff noted that REGDOC-2.4.4 was anticipated to be included in the next revision of the SRBT LCH, once published.

As such, on October 6, 2022, SRBT proposed a plan of action to ensure that the next revision of the SAR meets the requirements of REGDOC-2.4.4, in consideration of this anticipated change in the LCH. This plan was accepted by CNSC staff on October 20, 2022.

SRBT conducted a comprehensive gap analysis between the safety analysis-related processes implemented, and the new REGDOC.

This analysis and an associated implementation plan was submitted to CNSC staff on December 27, 2022, where it was noted that all required process improvements shall be completed by March 31, 2023, and a revised SAR submitted to CNSC staff by July 31, 2023.

3.2 SCA – Physical Design

As a manufacturing company, SRBT owns and operates several pieces of equipment, many of which constitute structures, systems and components which have a bearing on safety and our licensed activities.

Such equipment includes the active ventilation systems and associated emissions monitoring equipment, fire detection and suppression systems, tritium processing rigs, tritium-in-air monitors, and liquid scintillation counters.

The overall facility design is also a key aspect of our operations, and must be managed and controlled safely. The SRBT change control process helps to ensure that modifications are controlled, reviewed, accepted, and recorded using an Engineering Change Request.

Modifications to structures, systems and components associated with our licensed activities are conducted in accordance with these change control processes and overall management system.

No significant changes in physical design of production- or safety-related facility systems or components took place in 2022. There were no changes to the self-luminous tritium light source production capacity of the facility.

All minor and non-safety significant modifications to structures, systems and components were conducted in accordance with our change control processes.

3.3 SCA – Fitness for Service

All equipment, including all safety-related equipment, is kept in a condition that is fit for service through the implementation of the Maintenance Program. The facility and equipment associated with the facility were effectively maintained and operated within all manufacturer requirements.

Note that, although the Maintenance Program incorporates several program elements associated with nuclear power plants as best practice (such as critical spares, master equipment lists, etc.), aging management is not an element that is formally included as a specific strategy.

Documented maintenance meetings were initiated and held by the Maintenance Committee throughout 2022. As part of management review processes, an annual review of 2022 activities will be conducted in 2023, including data pertaining to equipment failures, maintenance activity success rates, non-conformances, procedural revisions, and audit findings.

Maintenance records are kept on file including completed work orders of preventative maintenance activities. A maintenance schedule is created and managed by the Fire Protection Specialist, which effectively captures all safety-significant planned preventative maintenance activities, whether performed by SRBT personnel or an approved contractor, and includes maintenance inspections as required by the Fire Protection Program.

As well, corrective maintenance was tracked, trended and reviewed to assess the performance of equipment, and to identify any preventative activities which may improve performance.

Preventative maintenance was scheduled and performed in 2022 on key facility equipment as per **Appendix B** of this report.

3.3.1 Ventilation

The ventilation of the facility is such that the air from the facility flows to the area with greatest negative pressure in Zone 3 which has the highest potential for tritium contamination where all tritium processing takes place. This area and part of Zone 2 are kept at high negative pressure with the use of two air handling units which combined provide airflow of approximately 10,000 cubic feet per minute.

The air handling units are connected to a series of galvanized stainless-steel ducts. In addition to providing ventilation for the facility these air handling units

also provide local ventilation to a number of fume hoods which are used to perform activities that have a potential for tritium contamination and exposure.

All ventilation systems were maintained fit for service throughout 2022. Corrective and preventative maintenance was identified and performed according to the requirements of the Maintenance Program and operational procedures. Key equipment is maintained either on a quarterly or semi-annually basis, with technical equipment maintenance being performed by fully licensed and certified heating, ventilation and air conditioning contract providers.

A listing of the ventilation equipment maintained in 2022 can be found in **Appendix C** of this report.

3.3.2 Stack Flow Performance

Stack maintenance is performed by a third party, in order to ensure effective performance of the ventilation system and minimize airflow reductions from the beginning to the end of the maintenance cycle to ensure accuracy of results.

Pitot tubes that were installed in the stacks are maintained by a third party to ensure stack airflow are at design requirements. This essentially allows for daily stack flow verification in addition to more detailed annual stack flow verification performed by a third party.

The annual stack flow performance verification was performed on September 22, 2022 by a third party. The inspection confirmed that the stacks continue to perform to design requirements. SRBT continues to monitor and trend the results of the annual stack performance verification.

3.3.3 Liquid Scintillation Counters

The two TriCarb 2910 LSC units were subjected to an annual preventive maintenance procedure on July 27, 2022. No significant concerns or issues were identified during the maintenance activity.

There were no instances where corrective maintenance was required on either LSC unit in 2022.

Both systems will continue to be preventively maintained and calibrated on an annual basis by a qualified service representative from the manufacturer of the equipment, to ensure their functionality, accuracy and reliability.

3.3.4 Portable Tritium-in-Air Monitors

Portable tritium-in-air monitors are maintained and made available throughout the facility. The portable units are used to investigate potential sources of tritium leakage, and for personnel protection.

As of the end of 2022, SRBT owns a total of eight portable monitors, as well as an additional unit that is used by our sister company in North Carolina.

Six of these monitors are used at the facility (one in Zone 1, two in Zone 2 and three in Zone 3), a seventh is kept on emergency standby at the Pembroke Fire Hall as part of an emergency preparedness kit, and the eighth unit is kept as a ready spare in the LSC laboratory.

As required by our Radiation Safety Program, all in-service tritium-in-air monitors were calibrated and maintained at least once during 2022, with all records of the maintenance kept on file.

Corrective maintenance of portable monitors was initiated in two cases in 2022:

- Serial number (SN) 4198 was sent to the manufacturer to replace the high voltage power supply (which was discovered by the manufacturer to have an unrepairable defect) as well as several subcomponents, and
- SN 4641 was sent to the manufacturer for refurbishment, and repair of the jack for the external power adaptor.

3.3.5 Stationary Tritium-in-Air Monitors

The ambient air in selected key areas of the facility is continuously monitored using stationary tritium-in-air monitors.

There continues to be five stationary tritium-in-air monitors deployed for continuous airborne tritium monitoring at the facility, with two spare units available if needed.

The in-service monitors operate 24 hours a day to ensure that any upset conditions are identified and addressed quickly.

Three monitors are strategically located in Zone 3; one in the Rig Room where gaseous tritium light sources are filled and sealed; one in the Laser Room where a laser is used to cut and seal small gaseous tritium light sources, and light sources are inspected; and one in the Tritium Laboratory where tritium is transferred from bulk supply containers to filling containers.

One stationary tritium-in-air monitor is located in Zone 2 in the Assembly Area, where gaseous tritium light sources are pre-packed in preparation for shipping or installed into device housings.

A stationary tritium-in-air monitor is located in the Shipping area in order to provide an early warning signal of a problem should a light or device be damaged during packaging activities.

As required by our Radiation Safety Program all tritium-in-air monitors were calibrated and preventively maintained at least once during 2022. All facility monitors functioned effectively and continuously throughout the year, with all records of maintenance retained on file.

3.3.6 Stack Monitoring Equipment

Stack monitoring equipment is incorporated for each of two main air-handling units. For each air-handling unit, the monitoring equipment includes:

- A tritium-in-air monitor connected to a real-time recording device,
- An alarming remote display unit (RDU) in Zone 3,
- A bubbler system for discriminately collecting HTO and HT in the sampled stream of effluent,
- A flow measurement device with elapsed time, flow rate and volume of the sampled stream of effluent, and
- A dedicated back-up power supply servicing the monitors, bubbler systems and flow meters, capable of providing several hours of uninterrupted power to the equipment during a power failure.

Each tritium-in-air monitor is connected to real-time recording devices (chart recorders), and was calibrated and preventively maintained as required in 2022.

The chart recorders (analog and digital), tritium monitors and RDUs are included in calibration verification activities on a quarterly basis.

Bubbler systems (and spare systems) were also maintained throughout the year, with a bi-monthly maintenance cycle being implemented on all in-service stack monitoring equipment.

No corrective maintenance was required on any of the components that comprise the stack monitoring equipment.

3.3.7 Stack Monitoring Verification Activities

The annual verification activity for the bubbler systems was completed in June 2022, where independent third-party measurements provided validation that SRBT bubblers continue to effectively measure weekly gaseous tritium emissions (both HTO and HT).

The acceptance criterion for deviation between the assessed measurements of gaseous emissions is +/- 30%. In 2022, all results fell within this acceptance criteria, with SRBT measurements ranging between 76.7% and 93.2% of those obtained by the independent third party.

3.3.8 Weather Station

Maintenance of the weather station is performed as per the manufacturer's recommendation, every two years, with batteries being replaced every four years.

Preventive maintenance was last completed in 2021, and is scheduled to be performed in 2023. Batteries were last replaced in 2021, and are next scheduled for replacement in 2025.

In July, the precipitation counting function on the weather station malfunctioned, resulting in prolonged downtime for that specific function. Once the required replacement parts were received, corrective maintenance was completed and full functionality restored on November 24.

3.3.9 Air Compressor

Process tasks at SRBT require the use of a compressed air system. The air compressor is subject to quarterly preventative maintenance activities, and semi-annual belt changes, all of which were carried out throughout 2022. During periods of high usage rates, additional maintenance is performed on the compressor as an extra precaution to ensure ideal performance.

During preventative maintenance of the main compressor motor, the backup compressor is brought online to minimize production downtime. Once the maintenance is completed on the main compressor, the backup is then inspected and maintained by the contractors to ensure it will perform as intended should any problems arise with the main compressor.

4. Core Control Processes SCAs

4.1 SCA – Radiation Protection

4.1.1 Dosimetry Services

Pursuant to CNSC Dosimetry Service Licence 11341-3-28, SRBT assesses the radiation dose to its employees and to contract workers who may have exposure to tritium.

SRBT implements a dedicated Dosimetry Service Program in support of compliance with the requirements of this licence. The assessment of dose to personnel, due to tritium uptake, is performed in accordance with CNSC REGDOC-2.7.2, *Dosimetry, Volume II, Technical and Management System Requirements for Dosimetry Services*.

All dosimetry results were submitted on a quarterly basis to Health Canada in a timely fashion for input to the National Dose Registry. A final annual report was also submitted as required.

SRBT participated in the annual Tritium Urinalysis Performance Test sponsored by the National Calibration Reference Centre for Bioassay, Radiation Surveillance and Health Assessment Division, Radiation Protection Bureau of Health Canada. The participation is a regulatory requirement for Dosimetry Service Providers.

SRBT received the Certificate of Achievement for successful participation in the Tritium Urinalysis Performance Test from the National Calibration Reference Centre for Bioassay and In Vivo Monitoring for the year 2022[13].

As required by the licence, SRBT has submitted the 2022 Annual Compliance Report to CNSC staff for the Dosimetry Service Licence[14].

4.1.2 Staff Radiation Exposures and Trends

All SRBT staff members are classified as Nuclear Energy Workers and participate in the dosimetry program.

Those who work in Zones 1 and 2 provide bioassay samples for tritium concentration assessment on a bi-weekly frequency due to the very low probability of uptake of tritium. Those assigned to work in Zone 3 provide bioassay samples on a weekly frequency due to the higher probability of chronic uptake of tritium.

There were no occurrences of any personnel contamination events in 2022.

The maximum effective dose received by any person employed by SRBT in 2022 was 0.46 mSv, a value which is well within the regulatory limit for a nuclear energy worker of 50.0 mSv per calendar year.

The average effective dose for all staff was calculated to be 0.048 mSv, while the collective dose for all workers was measured as 2.01 person·mSv (for 42 persons total).

The tables found in **Appendix D** of this report provide the radiological dose data for workers at SRBT for 2022, as well as a comparison of dosimetry results for the preceding five years.

4.1.3 Action Levels for Dose and Bioassay Level

Dose and bioassay tritium concentration action levels are defined in SRBT's *Licence Limits, Action Levels and Administrative Limits* document.

Radiation protection-related action levels were last reviewed and revised in 2019, in line with the requirements of the LCH.

The current radiation protection-related action levels are as follows:

TABLE 9: ACTION LEVELS FOR RADIATION PROTECTION

PERSON	PERIOD	ACTION LEVEL
NUCLEAR ENERGY WORKER	CALENDAR QUARTER	1.0 mSv
	1 YEAR	3.0 mSv
	5 YEAR	10.0 mSv
PREGNANT NUCLEAR ENERGY WORKER	BALANCE OF THE PREGNANCY	0.5 mSv

PARAMETER	ACTION LEVEL
BIOASSAY RESULT	1,000 Bq / ml FOR ANY PERIOD

In 2022 there were no exceedances of an action level for dose or bioassay tritium concentration at SRBT.

4.1.4 Administrative Limits for Dose and Bioassay Level

Dose and bioassay tritium concentration administrative limits are also defined in SRBT's *Licence Limits, Action Levels and Administrative Limits document*.

Radiation protection-related administrative limits are as follows:

TABLE 10: ADMINISTRATIVE LIMITS FOR RADIATION PROTECTION

PERSON	PERIOD	ADMINISTRATIVE LIMIT
NUCLEAR ENERGY WORKER	CALENDAR QUARTER	0.67 mSv
	1 YEAR	2.00 mSv
	5 YEAR	8.50 mSv

PARAMETER	ADMINISTRATIVE LIMIT
BIOASSAY RESULT	500 Bq / ml FOR ANY PERIOD IN ZONE 3 100 Bq / ml FOR ANY PERIOD IN ZONE 1 OR 2.

In 2022 there were no exceedances of an administrative limit for dose or bioassay tritium concentration at SRBT.

4.1.5 Contractor Dose

In 2022, SRBT did not employ contract staff to perform work that presented a significant radiological hazard.

Five screening bioassay samples were obtained and measured from contracted tradespersons who provided maintenance support in areas other than Zone 1.

None of these samples exceeded our internal screening criteria requiring the calculation of effective dose.

To summarize, no contractor received a recordable dose due to activities performed at the SRBT facility in 2022.

4.1.6 Discussion of Significance of Dose Control Data

A tabular summary of effective dose metrics for 2022 is provided in **Appendix D.**

4.1.6.1 Maximum Dose

The maximum effective dose to any staff member in 2022 was 0.46 mSv. This individual works in Zone 3 and performs tritium processing operations in Zone 3 as their primary duty.

In 2021, the maximum dose to a staff member was 0.36 mSv; the 2022 value of 0.46 mSv thus represents a 28% increase in the maximum dose to a worker from the previous year.

The variance in maximum dose is within expected operational variance given the activities conducted during the year, and there is no expected difference in risk to workers due to this increase.

A maximum dose of 0.46 mSv represents the achievement of our internal target for 2022 of less than 0.50 mSv. This supports the conclusion that the Radiation Safety Program and the Health Physics Team are achieving a high level of performance, and that workers are properly and adequately trained in safely conducting activities that may pose a radiation hazard.

This also marks the eighth consecutive year where no SRBT worker received an effective dose in excess of 1 mSv, despite a consistently high rate of production throughput.

The maximum individual dose for the current five-year dosimetry period (January 1, 2021 – December 31, 2025) is 0.80 mSv (0.34 mSv in 2021 + 0.46 mSv in 2022 for this individual).

SRBT continuously strives to lower the maximum dose to workers by using several strategies, including training, contamination monitoring, frequent and routine use of portable tritium in air monitors during processing operations, and the continuous oversight of the Health Physics Team during key activities on the shop floor.

The maximum worker dose over the past five years is trended in Figure 3 for comparison, as well as a distribution chart in Figure 4 for worker doses in 2022.

FIGURE 3: MAXIMUM ANNUAL WORKER DOSE (2018-2022)

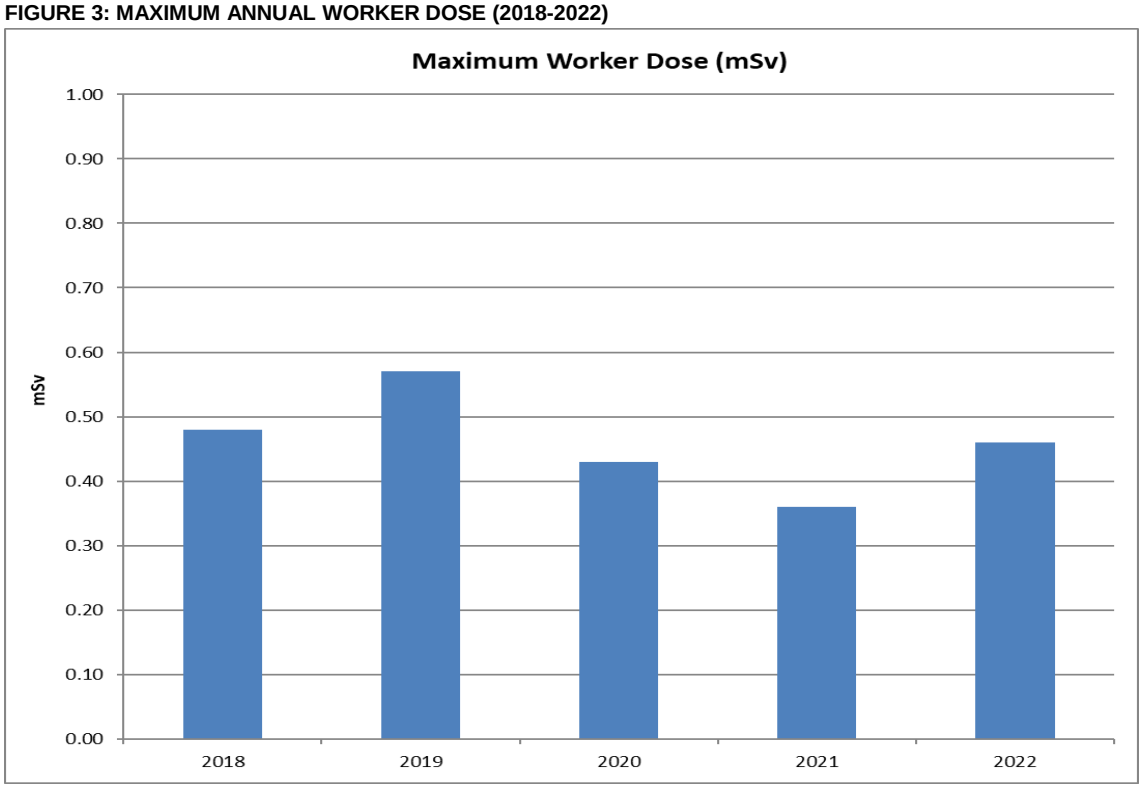
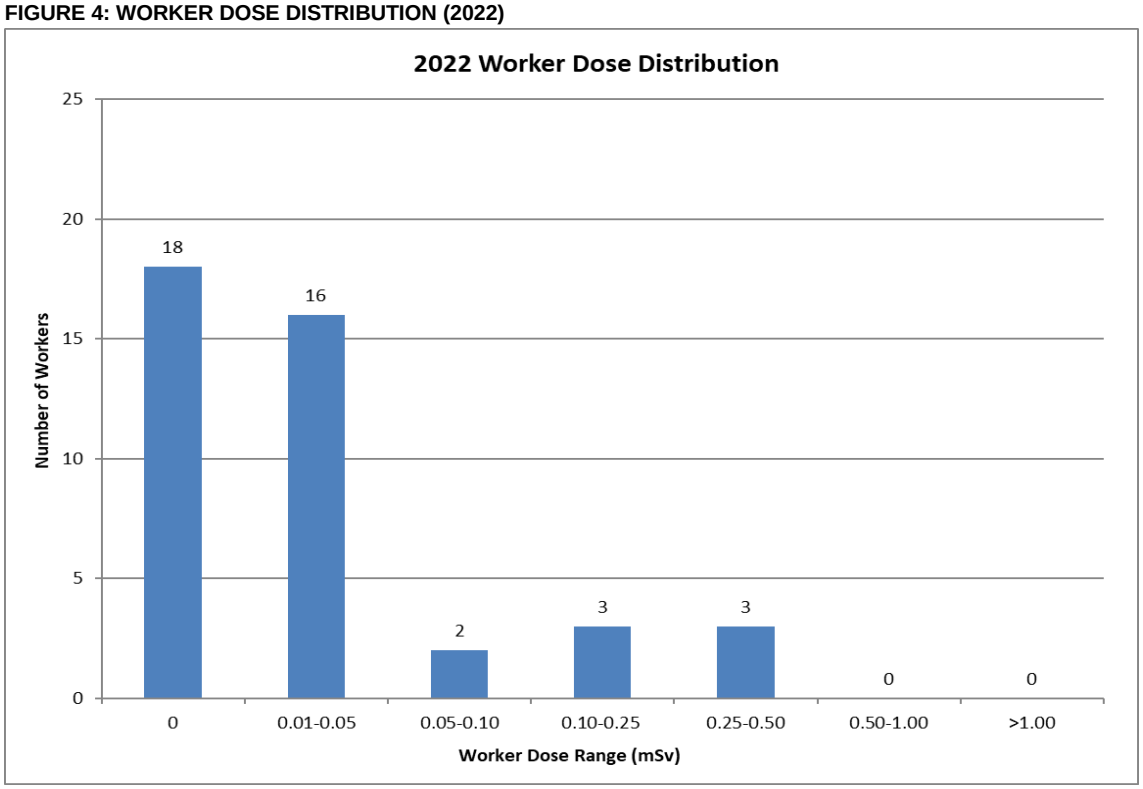


FIGURE 4: WORKER DOSE DISTRIBUTION (2022)



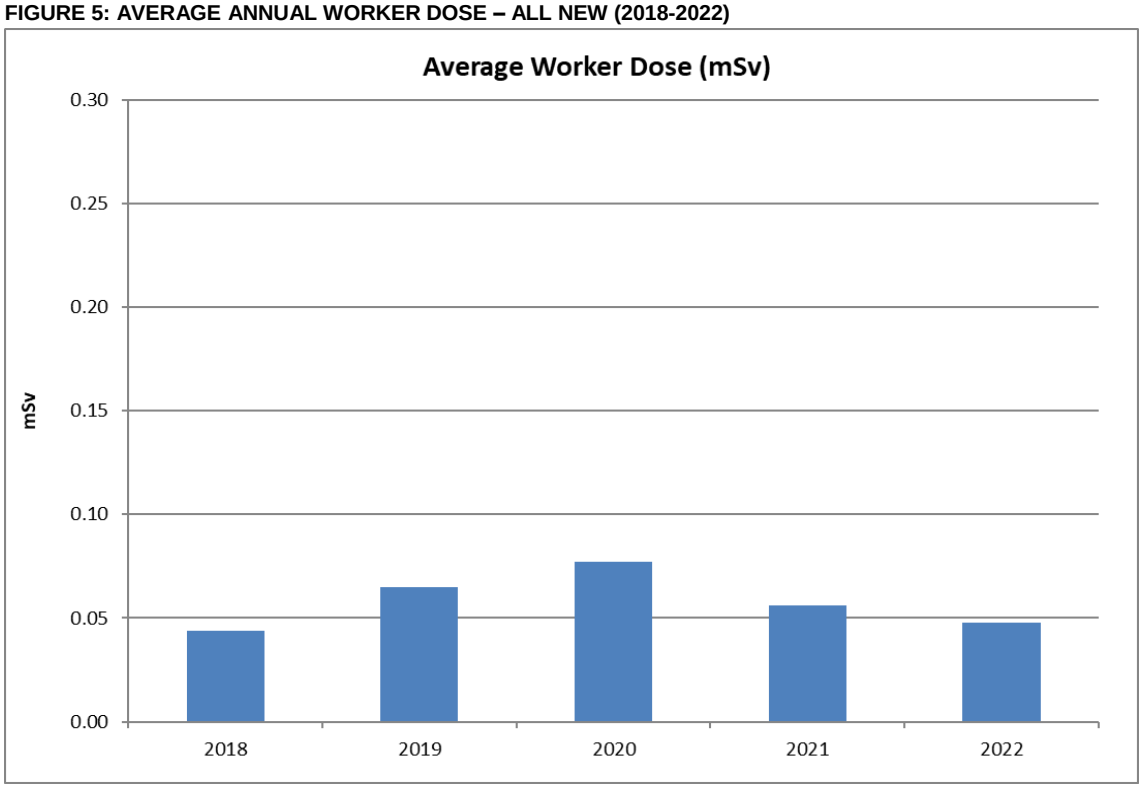
4.1.6.2 Average Dose

The average dose to workers at SRBT in 2022, including those workers whose dose value was zero, was 0.048 mSv.

In 2021, this average was 0.056 mSv, thus the 2022 data represents a decrease in the average dose to staff for the second consecutive year.

The average dose to all nuclear energy workers (NEW) at SRBT over the past five years is trended in Figure 5 for comparison.

FIGURE 5: AVERAGE ANNUAL WORKER DOSE – ALL NEW (2018-2022)

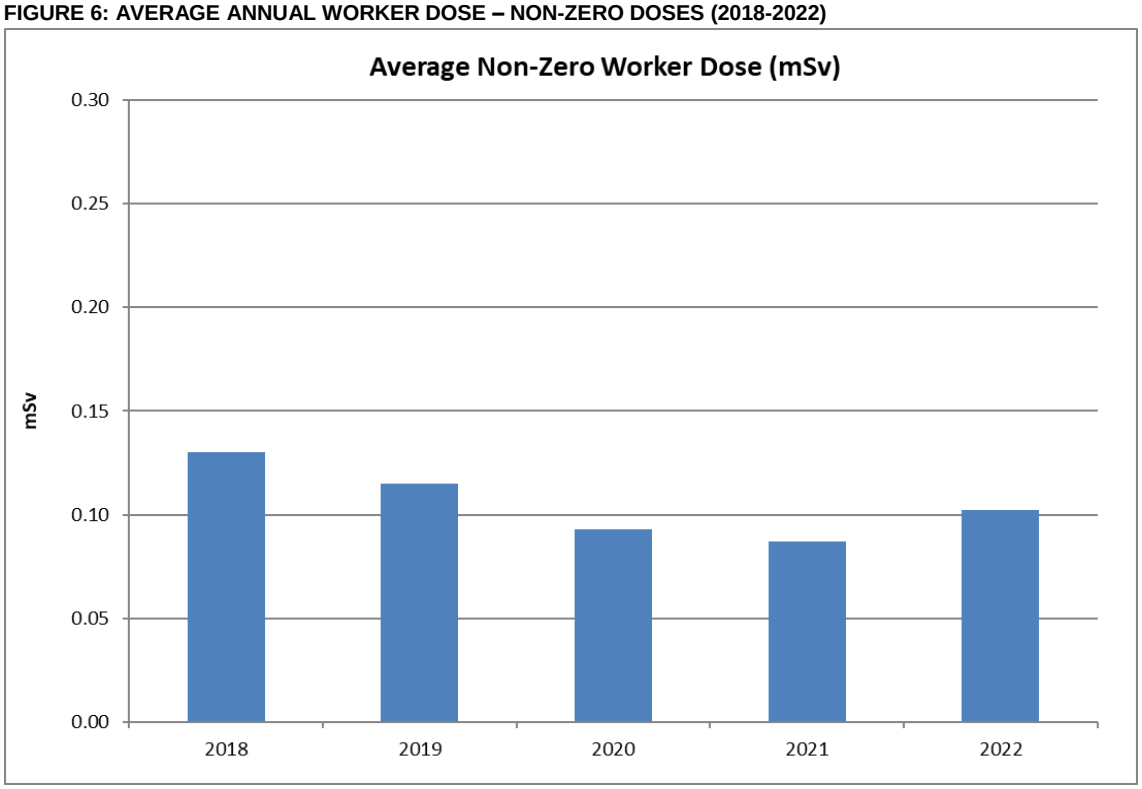


A total of 18 workers incurred effective doses of less than 0.01 mSv in 2022 (i.e. zero dose).

Taking into consideration only ‘non-zero’ doses, the average effective dose was 0.102 mSv in 2022.

The average dose to all workers at SRBT incurring ‘non-zero’ doses over the past five years is trended in Figure 6 for comparison.

FIGURE 6: AVERAGE ANNUAL WORKER DOSE – NON-ZERO DOSES (2018-2022)



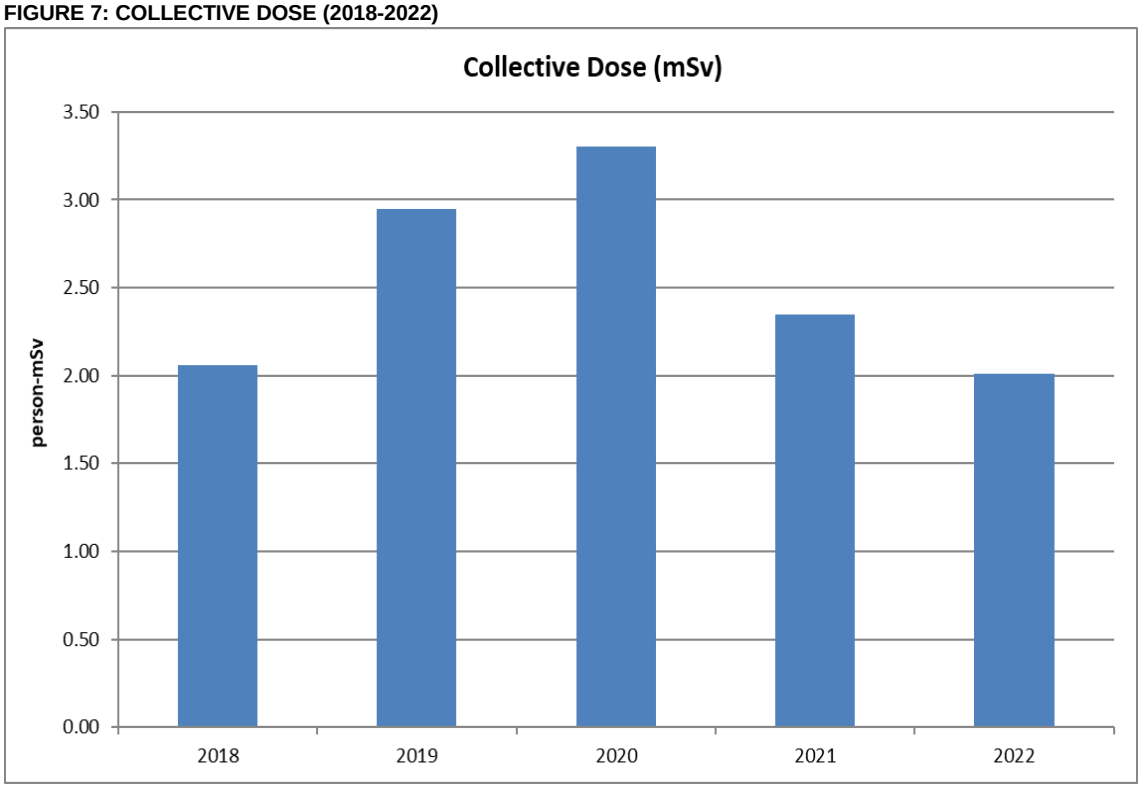
4.1.6.3 Collective Dose

The collective dose to all workers at SRBT in 2022 was 2.01 person·mSv.

In 2021, the collective dose was 2.35 person·mSv. The annual collective dose for SRBT workers decreased by about 14% in 2022.

The collective dose to all workers at SRBT over the past five years is trended in Figure 7 for comparison.

FIGURE 7: COLLECTIVE DOSE (2018-2022)



4.1.6.4 Dose to Members of the Public

The effective dose to members of the public is discussed extensively in section 4.3.5 of this report.

4.1.7 Contamination Control and Facility Radiological Conditions

Tritium contamination control is maintained by assessment of non-fixed tritium contamination levels throughout the facility by means of swipe method and liquid scintillation counting of the swipe material. SRBT has in place the following administrative surface contamination limits:

TABLE 11: ADMINISTRATIVE LIMITS FOR SURFACE CONTAMINATION

ZONE	SURFACES	ADMINISTRATIVE SURFACE CONTAMINATION LIMITS
1	ALL SURFACES	4.0 Bq/cm^2
2	ALL SURFACES	4.0 Bq/cm^2
3	ALL SURFACES	40.0 Bq/cm^2

An overview of contamination monitoring results for 2022 has been tabulated and is included in **Appendix E** of this report. A total of 8,220 assessments were performed in various work areas in 2022.

A total of 612 swipes were taken in Zone 1 resulting in a pass rate of 98.20% of assessments being measured below the administrative level of 4 Bq/cm^2.

A total of 1,752 swipes were taken in Zone 2 resulting in a pass rate of 97.95% of assessments being measured below the administrative level of 4 Bq/cm^2.

A total of 5,856 swipes were taken in Zone 3 resulting in a pass rate of 97.03% of assessments being measured below the administrative level of 40 Bq/cm^2.

All swipe results are reported to the area supervisors. The area supervisor and the Health Physics Team reviews the results to determine where extra cleaning effort is necessary.

A comparison of the data for the last five years is presented in the table below:

TABLE 12: PASS RATE FOR CONTAMINATION ASSESSMENTS (2018-2022)

ZONE	2018	2019	2020	2021	2022
1	97.0%	96.5%	96.4%	97.1%	98.2%
2	93.2%	93.1%	96.7%	97.5%	98.0%
3	94.9%	93.5%	96.1%	95.6%	97.0%

Overall, routine contamination measurements conducted throughout the facility in 2022 fell below the administrative limits 97.31% of the time, achieving the internal target of ≥ 95% by a margin of 2.31%.

This marks the third consecutive year where the surface contamination target of >95% pass rate has been achieved. In 2023, the Health Physics Team increased the target for this aspect of our operations to >95.5% pass rate.

The Health Physics Team continues to track and trend all facility contamination control data throughout the year, with a focused quarterly review to identify areas for improvement.

With respect to the monitoring of airborne tritium contamination throughout the facility, SRBT's Radiation Safety Program includes several processes that measure and control airborne tritium hazards in our facility:

- Stationary tritium-in-air monitors are strategically located throughout the facility, with audible alarms triggered at conservative tritium concentrations.
- All staff are trained in the use of portable tritium-in-air monitors for self-protection purposes; these are also strategically located in the facility for quick use when needed.
- A series of passive air samplers are distributed throughout the facility, allowing for weekly averaging of tritium concentrations in key areas.
- The Health Physics Team logs all stationary tritium-in-air monitor alarm events, in order to track and trend frequency of occurrence, to facilitate radiological assessments and/or investigations, and to drive improvements in process safety.

Zone alarm cause / frequency and passive air sampling data is routinely assessed by the Health Physics Team in order to identify any areas of concerns or trends. The frequency of zone alarms decreased in 2022 when compared to 2021; a total of 45 alarms were experienced throughout the facility in 2022, compared to 72 during the previous year.

A comparison of the data for the last five years is presented in the table below:

TABLE 13: ZONE ALARMS (2018-2022)

ZONE	2018	2019	2020	2021	2022
1	0	4	0	3	2
2	30	62	71	52	31
3	8	69	40	17	12
All	**38**	**135**	**111**	**72**	**45**

4.1.8 Discussion on the Effectiveness of Radiation Protection Program

Based upon the following factors and the overall evidence presented in this report, it is concluded that the SRBT's radiation protection program has been effective throughout the year.

Key points:

- The highest worker dose for 2022 was 0.46 mSv, or 0.92% of the regulatory limit of 50 mSv.
- For the eighth consecutive year, every SRBT NEW incurred an effective dose of far less than 1 mSv (which represents the annual regulatory limit defined in the *Radiation Protection Regulations* for a person who is not a NEW).
- Collective dose and average dose remain low in relation to production levels, with both of these data points decreasing compared to the previous year. Improvement measures have been effective at helping to reverse the trend of minor increases in these data points.
- Contamination control data demonstrates a high level of control and a low rate of contamination in excess of administrative limits. The internal target of a pass-rate of 95% or greater was achieved for the third consecutive year.
- There were no personnel contamination events at the facility in 2022.
- The frequency of airborne contamination events (zone alarms) continued to decrease in 2022.
- Radiation protection equipment issues are minimal, with a continuing investment in new equipment leading to an excellent track record of maintenance and fitness for service.
- Radiation protection training results demonstrate that staff has a good appreciation and knowledge of how to protect themselves from hazards.

4.1.9 Occupational Dose Targets

As described in the 2021 annual compliance report, the occupational dose targets for 2022 were set as 0.50 mSv (maximum dose to staff member) and 0.060 mSv (average dose to all staff).

The maximum dose to any worker was 0.46 mSv (target met). The average dose to all workers was 0.048 mSv (target met). There were no action level exceedances.

SRBT projects that in 2023, the maximum and average doses to workers should remain low and relatively stable.

With these considerations, the targets for calendar year 2023 have been set as follows:

- Maximum dose: ≤ 0.50 mSv (no change)
- Average dose: ≤ 0.055 mSv (lowered)
- Action level exceedances: No more than 1 instance (no change)

4.1.10 Summary of Radiation Protection Training and Effectiveness

All new staff members receive introductory training in radiation safety, even if they are not expected to handle nuclear substances as part of their responsibilities.

In 2022, three new employees were hired and were provided with this initial training that is required for declaration as a NEW. All three employees passed the associated test and were declared as NEWs.

Over the course of three days in December, SRBT held its annual all-staff training session, which includes a comprehensive training presentation specifically regarding radiation protection concepts and requirements, specifically tailored to the type of hazard at SRBT. Open dialogue is always encouraged with a question-and-answer session, and a closed-book written test is provided to all participants.

In 2022, all thirty-six participants successfully challenged the test, averaging a score of 98.5% on the ten-question multiple choice test, against a performance benchmark of 75%. Any incorrect answer on the test was discussed in detail with each employee individually to ensure full understanding following the completion of the training.

A SAT-based classroom course on the Bioassay and Dosimetry was conducted in 2022; both participants achieved passing grades in the written test as they worked towards becoming qualified to perform activities in this area.

4.1.11 Summary of Radiation Protection Equipment Performance

In 2022, all equipment associated with radiation protection at SRBT performed acceptably, and all key maintenance activities, such as instrument calibration, were performed as required.

Radiation protection equipment includes liquid scintillation counters, portable tritium in air monitors, stationary tritium in air monitors and portable radiation detectors (‘RadEye’ type alpha/beta/gamma detectors).

There were no instances of corrective maintenance required for the liquid scintillation counters, and only two instances where a portable tritium-in-air monitor was sent to the manufacturer for corrective maintenance.

The rate of the need for corrective maintenance on all radiation protection equipment remains acceptable, and SRBT owns and maintains spare instruments that remain ready to be put into service should the need arise.

4.1.12 Summary of Radiation Protection Improvements

SRBT's Radiation Safety Program continues to provide an effective level of radiological protection to our workers, and continues to be improved over time. In 2022, the following improvements were implemented:

- The HP team worked with manufacturing departments to reduce in the frequency of airborne contamination events (i.e. zone alarms). These efforts have been successful, with a significant reduction in alarms in the Assembly Department / Zone 2 specifically being observed.
- Procedure RSO-041, *Protective Clothing for Radiation Safety* was revised to incorporate an emergency kit containing items that may be used if a facility emergency were to take place. This initiative helped to address findings from the full-scale emergency exercise conducted in 2021.
- Procedure RSO-042, *Routine Tritium-in-Air Monitor Checks* was revised to introduce a different design of dust filter on portable tritium monitors, and to incorporate a monthly filter change as an improvement initiative.
- The routine analysis of data from in-house passive air samplers in Zone 3 was modified in order to optimize the assessment of chronic concentrations of tritium in air to which workers are exposed. The data from samplers located inside the ventilated rig cabinets was taken out of the set of data used to calculate averages in Zone 3 for radiation protection purposes, as this data is gathered for operational reasons, and does not impact worker dose.

4.2 SCA – Conventional Health and Safety

4.2.1 Jurisdiction

SRBT is subject to federal jurisdiction thus, the *Canada Labour Code Part II* (CLC Part II) and the *Canada Occupational Health and Safety Regulations*.

4.2.2 Conventional Health and Safety Program

Being under federal jurisdiction in 2022, the Health and Safety Policy for the SRBT facility was compliant with the requirements of the CLC Part II, and the *Canada Occupational Health and Safety Regulations*.

4.2.3 Workplace Health and Safety Committee

In accordance with Section 135 (1) of the CLC Part II, SRBT maintains a Workplace Health and Safety Committee (WHSC).

The Committee is comprised of four representatives. Under section 135(10) of the CLC Part II the Committee is required to meet no less than 9 times per year.

The Committee met a total of 12 times in 2022, with all meeting minutes kept on file.

4.2.4 Inspections, Audits and Reviews

The following inspections, audits and reviews were conducted in 2022:

- Twelve monthly facility-wide safety inspections, conducted by members of the WHSC, and
- One internal audit of the SRBT Health and Safety program.

The following are the findings and corrective actions from the inspections, audits and reviews:

- The monthly safety inspections identified only minor issues that were immediately corrected such as the first aid kit requiring some re-stocking of items and eye wash bottles requiring fluid changing due to expiry dates.
- Additional issues identified included the need to repair a pipe restriction that was preventing hot water from flowing to a washroom, and the need to remove a section of obsolete oxygen piping in the Coating Department that presented a minor hazard to workers (knees could contact / bump into the obsolete piping when sitting down). Both were completed.

- The internal Health and Safety program audit resulted in the issuance of four NCRs and one OFI, all of which are under review for action as of the end of 2022.

4.2.5 Minor Incidents

There were 12 minor incidents that met internal reporting criteria in 2022. A breakdown of the type of minor incidents occurring in 2022 is provided:

- Minor Cuts – 7
- Electrical shock – 1
- Slip – 1
- Fall – 1
- Sliver in finger – 1
- Exposure to chemical – 1

None of these minor incidents required a visit to the hospital, nor a report to the Workplace Safety and Insurance Board.

4.2.6 Lost Time Incidents

In 2022, no lost time incidents (LTI) occurred.

The following table summarizes the frequency of occurrence of LTIs over the past five years:

TABLE 14: LOST TIME INCIDENTS FIVE-YEAR TREND (2018-2022)

DESCRIPTION	2018	2019	2020	2021	2022
LOST TIME INCIDENTS	0	0	0	0	0

SRBT's continuing goal is to have zero LTIs each year; the fact that this goal was achieved in 2022 speaks to the effectiveness of our conventional health and safety program.

4.2.7 Health and Safety Performance Targets

SRBT sets programmatic targets that are tracked by responsible safety committees throughout the year. Actions are taken that are intended to help the organization reach safety goals / objectives / targets, as well as when they may be missed.

In 2022, SRBT set the following targets for the area of Conventional Health and Safety:

- Zero lost time incidents (experienced zero – goal achieved)
- Less than or equal to 5 workplace injuries classified as **reportable** to Workplace Safety and Insurance Board (experienced zero – goal achieved)
- No more than 15 minor incidents (12 were recorded – goal achieved)

These three conventional health and safety targets remain unchanged for 2023.

4.2.8 Reporting

In accordance with Section 15.10 (1) of Part XV of the *Canada Occupational Health and Safety Regulations,* the Employer's Annual Hazardous Occurrence Report was submitted to Employment and Social Development Canada prior to March 1, 2022, as required.

In accordance with Section 9 of the *Policy Committees, Work Place Committees and Health and Safety Representatives Regulations*, the Work Place Committee Report was submitted to the Regional Safety Officer at Canada Labour prior to March 1, 2022, as required.

4.2.9 Health and Safety Training

The following training took place in 2022:

- The Manager – Safety and Security attended an off-site seminar titled ‘Mental Stress – WSIB Claims and What You Need to Know’.
- All SRBT employees attended annual training on WHMIS in December.

4.2.10 Health and Safety Initiatives and Improvements

In 2022, the following health and safety initiatives and improvements were implemented:

- Three new health and safety procedures were created.
- An additional spill kit was purchased.
- All hazards in the facility were reviewed by the committee, supervisors and senior management to ensure all possible safety precautions are taken when dealing with them to prevent worker injuries. One hazard was identified as could be improved by having a foot pedal shut off switch installed. This is being explored further.
- The eye wash station in coating was updated to replace old faucet hardware. A new eyewash station faucet was installed.

4.3 SCA – Environmental Protection

This section of the report will provide environmental protection compliance information, including results from environmental, effluent and groundwater monitoring, an assessment of compliance with any licence limits, historical trending where appropriate, and quality assurance/quality control results for the monitoring.

As part of SRBT's overall Environmental Protection Program, and as an input into the design of the environmental, effluent and groundwater monitoring programs, a conceptual site model (CSM) can provide a valuable representation of the factors and elements that are considered for monitoring within the boundaries of the program.

SRBT has been in operation since 1990, and has performed extensive monitoring of effluent, the environment and groundwater over the course of operations since then. In 2007, a comprehensive analysis was performed of the operations of the facility (including historical practices) in order to identify the sources of tritium that could affect the environment and the groundwater.

As well, in 2008 the significant environmental aspects of facility operation were initially established, and have been reviewed periodically since then in order to identify if there are other processes or operations that have been introduced that could lead to an impact on the environment.

These analyses, coupled with decades of operational experience, leads to the establishment of a simplified CSM that shows the significant pathways and environmental interactions pertaining to the release of the sole radiological contaminant of potential concern – tritium.

A pictographic representation of these source – receptor pathways is provided below in Figure 8, and should be consulted when considering the information provided in the next three subsections of this report.

On April 22, 2021, CNSC staff accepted SRBT's Environmental Risk Assessment[15], after comments and feedback had been addressed by SRBT[16]. The ERA complies with the requirements of CSA Standard N288.6-12, *Environmental risk assessments for Class I nuclear facilities and uranium mines and mills*.

Human and ecological conceptual models of tritium interactions with the environment near the site are described within the ERA, and are included in Figures 9, 10, 11 and 12. Species included are conservatively representative of the local flora and fauna.

FIGURE 8: CONCEPTUAL SITE MODEL

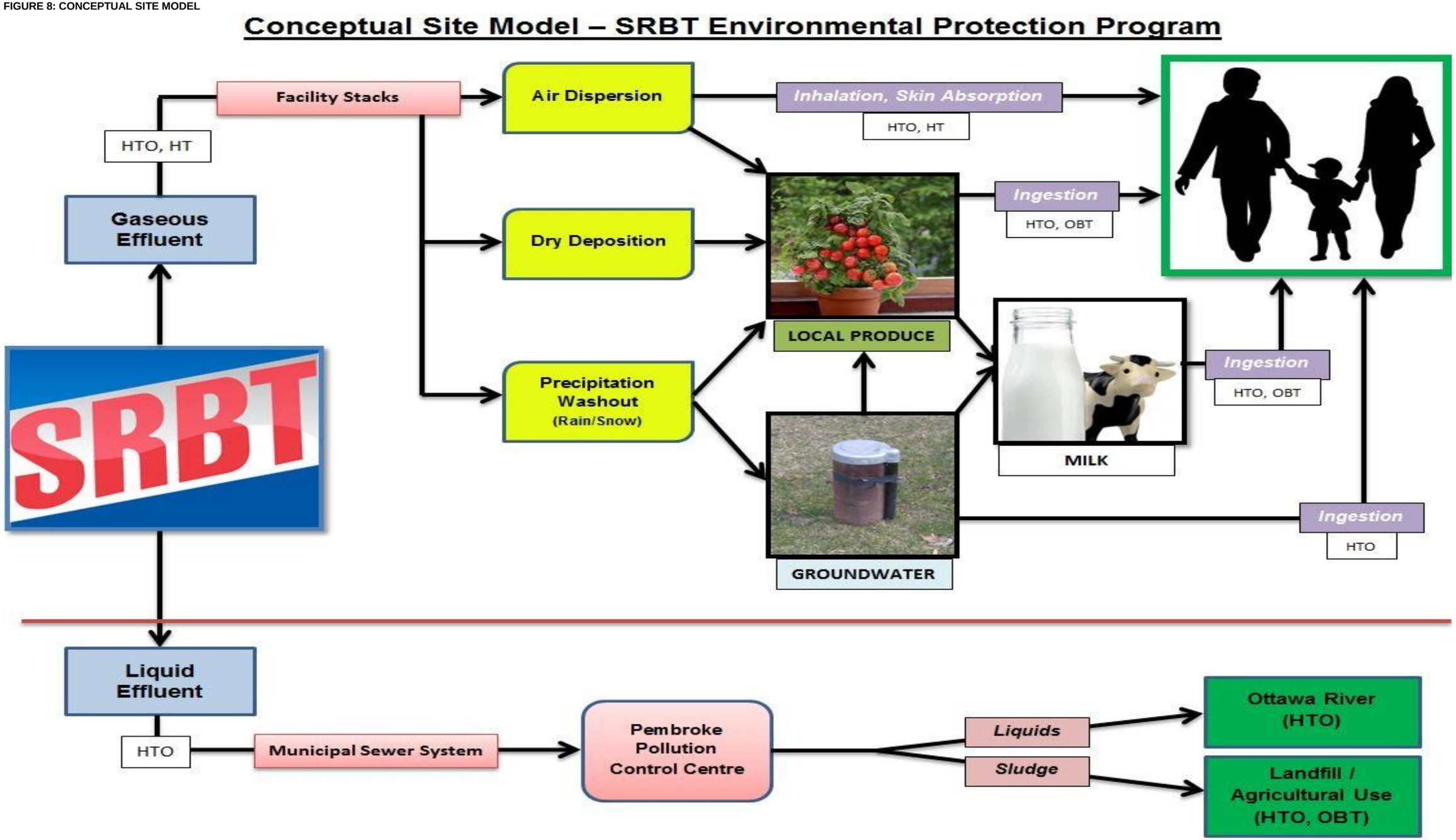


FIGURE 9: HUMAN EXPOSURE PATHWAYS (HTO/T2, GASEOUS SOURCES)

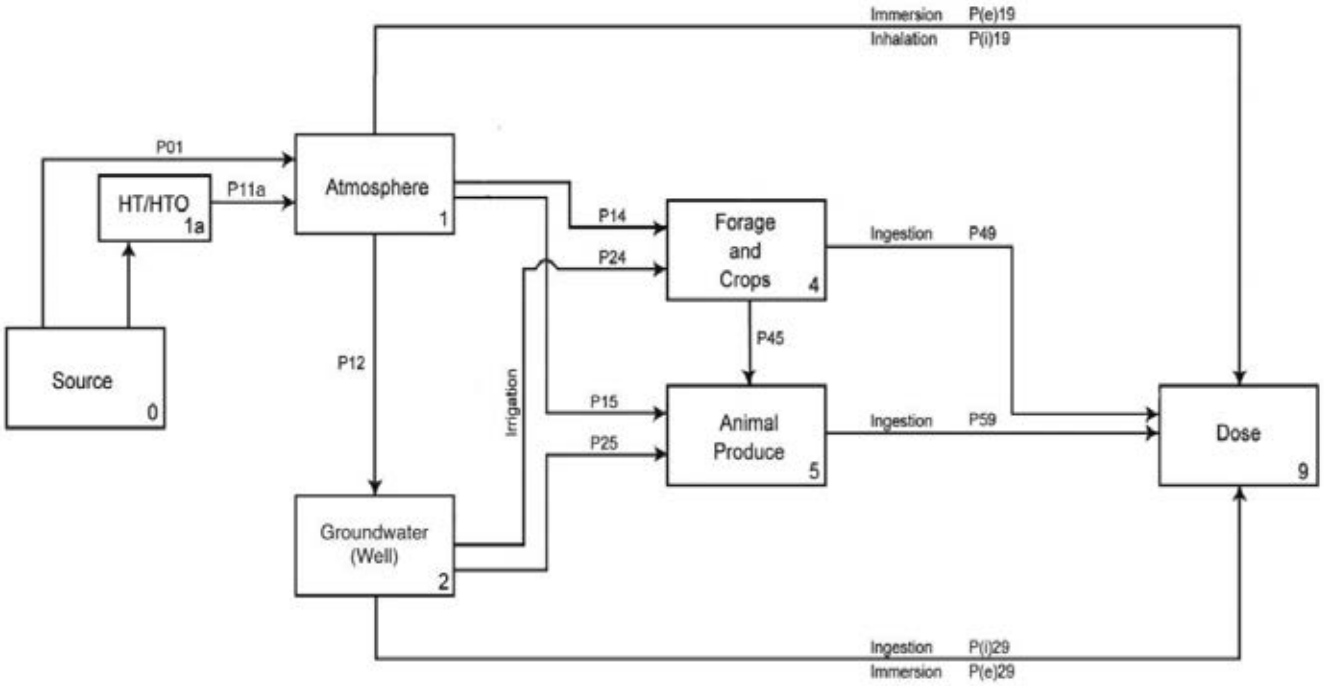


FIGURE 10: HUMAN EXPOSURE PATHWAYS (HTO/T2, LIQUID SOURCES)

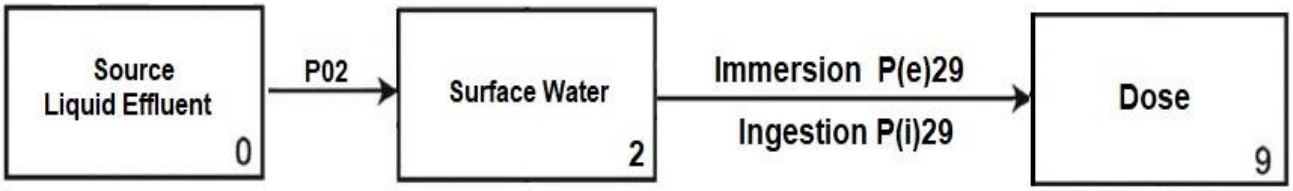


FIGURE 11: CONCEPTUAL ECOLOGICAL MODEL - TERRESTRIAL

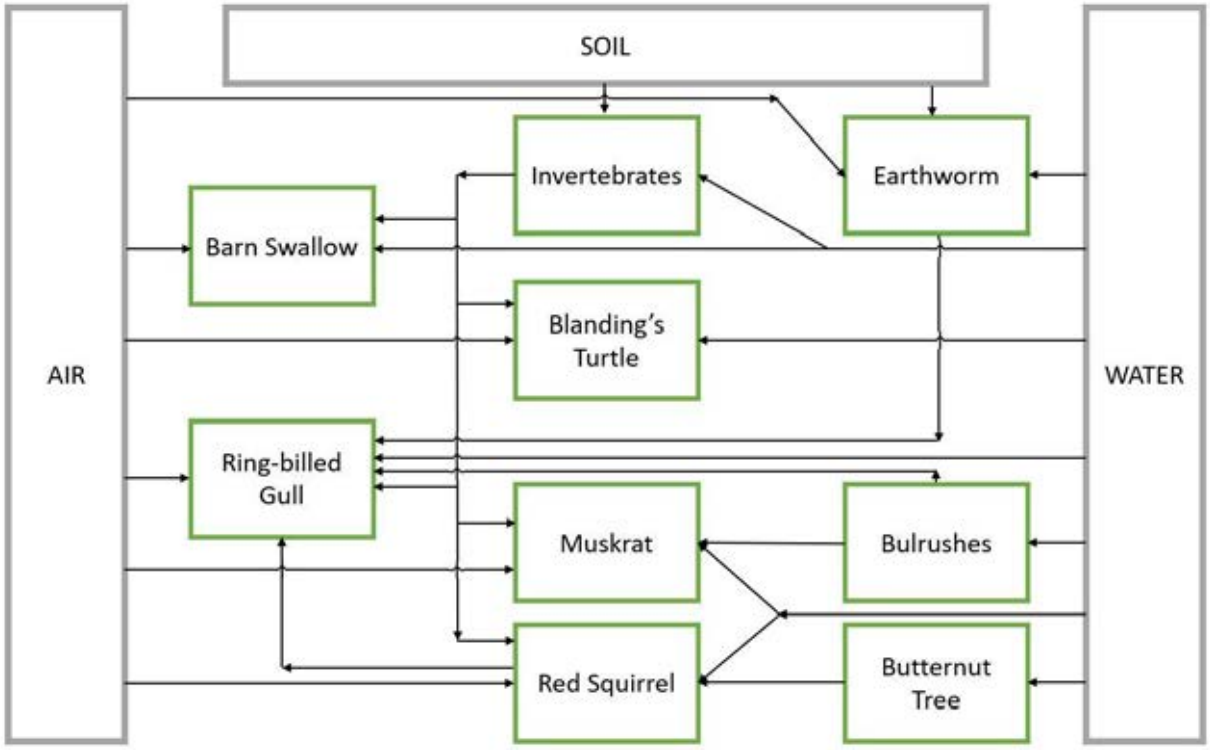
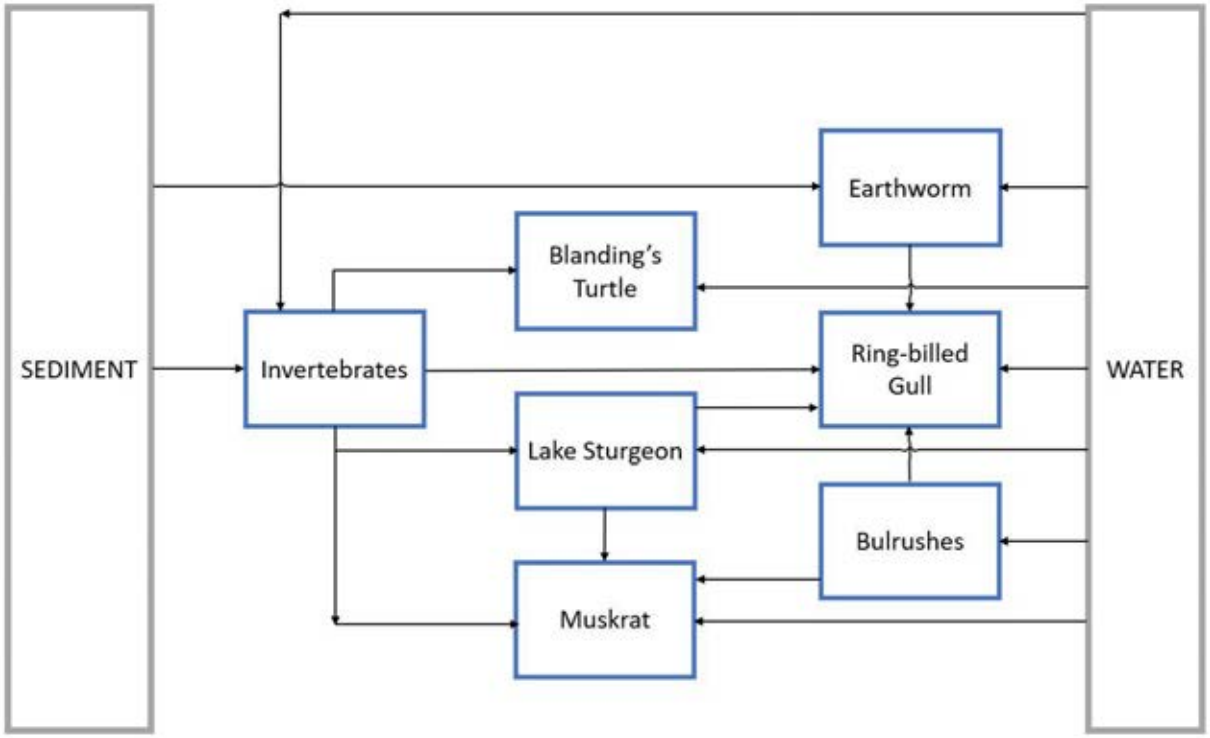


FIGURE 12: CONCEPTUAL ECOLOGICAL MODEL – AQUATIC / RIPARIAN



As part of ensuring compliance with the reporting requirements of several N288-series of standards, SRBT has committed to ensuring that the information required by each applicable in-force standard to be reported annually pertaining to the Environmental Monitoring Program (EMP), Effluent Monitoring Program (EffMP) and Groundwater Monitoring Program (GMP) is included our annual compliance report.

A summary of the requirements of each of the applicable standards is provided here.

N288.4-10: Environmental monitoring programs at Class I nuclear facilities and uranium mines and mills: Section 11.2.2 – "The report shall include":

TABLE 15: REPORTING REQUIREMENTS (N288.4-10)

	REQUIREMENT	**REPORT SECTION**
a	The results of the EMP, including measurements of the monitored hazardous and/or nuclear substances, physical stressors, and physical and biological parameters, including their statistical analyses (i.e. assessment of changes through space and time).	4.3.1 **Appendices F through M**
	Radiation doses calculated as doses to receptors where this is required.	4.3.5 **Appendix R**
	An assessment of the EMP results compared with the previous performance indicator targets.	4.3 Reference is made to previous years for performance indication.
	Documentation and justification of any deviations from field sampling, and analytical and data management procedures.	4.3.1.10 4.3.1.11
b	A summary and assessment of the field and laboratory QA/QC results including any non-conformances.	4.3.1.12
c	A summary of the audit and review results and subsequent corrective actions.	4.3.7
d	A summary of any proposed modifications to the EMP.	4.3.8
e	Documentation, assessment and review of any supplementary studies that have been initiated, completed, or both.	4.3.1.13

N288.5-11: Effluent monitoring programs at Class I nuclear facilities and uranium mines and mills: Section 11.2.2 – "The report shall include the results of the effluent monitoring program, including at least":

TABLE 16: REPORTING REQUIREMENTS (N288.5-11)

	REQUIREMENT	REPORT SECTION
a	The amount or concentration of radioactive nuclear substances and hazardous substances released, as required to demonstrate compliance with regulatory limits and performance with respect to any other release target (e.g., action levels).	4.3.2 Action levels and other targets: 4.3.2.2, 4.3.2.4 and 4.3.2.5 **Appendices O and P**
b	The characteristics of the effluents.	4.3.2
c	The results of any toxicity testing conducted (if required).	Not applicable
d	A summary and assessment of the field and laboratory QA/QC results, including any non-conformance.	4.3.2.6
e	A statement of uncertainties inherent in the monitoring results and any dose estimates derived from them.	4.3.2.7 Dose estimates are derived using EMP data
f	A summary of the audit and review results and subsequent corrective actions.	4.3.7
g	A summary of any proposed modifications to the effluent monitoring program.	4.3.8
h	Documentation, assessment, and review of any supplementary studies that have been initiated or completed, or both.	4.3.2.8

N288.7-15: Groundwater protection programs at Class I nuclear facilities and uranium mines and mills: Section 11.1 – "A facility should prepare annual monitoring reports documenting the GWMP, which include the following":

TABLE 17: REPORTING REQUIREMENTS (N288.7-15)

	REQUIREMENT	REPORT SECTION
a	The results of the GWMP including i) completeness of monitoring activities (identify if all planned activities were accomplished); ii) measurements of the monitored substances, biological, and hydrogeological parameters based on program objectives; and iii) data analysis and interpretations.	4.3.3 **Appendix N**
b	Relevant groundwater and hydrogeological characteristics.	4.3.3 **Appendix Q**
c	Doses calculated for the identified receptors (if doses have been calculated to aid in interpreting GWMP results).	Not applicable: GMP data does not contribute to dose calculations (residential wells fall within scope of EMP)
d	A summary and assessment of the field and laboratory QA results, including any non-conformances.	4.3.3.3
e	A statement of uncertainties inherent in the monitoring results and any dose estimates derived from them (where applicable).	4.3.3.4 4.3.5
f	Documentation of any supplementary studies that have been initiated, completed, or both (with references to the original studies).	4.3.3.5
g	An overall statement of data quality and discussion of results in terms of data performance and acceptance criteria.	4.3.3.6
h	Discussion of monitoring results in terms of program objectives and the conceptual site model.	4.3.3.7
Note 1	A summary of any audits performed, their results, and any corrective actions taken as a result of the audit's findings may also be included in the reporting.	4.3.7

4.3.1 Environmental Monitoring

SRB Technologies (Canada) Inc. implements a comprehensive EMP that provides data for site-specific determination of tritium concentrations along the various pathways of exposure to the public due to the activities of the operations.

4.3.1.1 Passive Air Monitoring

A total of 40 passive air samplers (PAS) are deployed in the environment near the SRBT facility.

Air at each location is sampled over the course of a month, and an average air concentration for that period is derived based on the concentration of tritium in the sampling liquid, and known air sample exchange rates. A minimum detectable activity of between 0.50 – 0.75 Bq/m^3 is typically achieved.

Thirty-five of these samplers are located within a two-kilometer radius from the SRBT facility, in eight sectors, ranging in stepped distances of 250, 500, 1,000, and 2,000 meters. The remaining five samplers are much further from the facility, and are intended to assess areas not expected to be impacted by routine SRBT processing operations.

Several duplicate samplers are included for quality assurance purposes. A number of samplers are also located specifically to provide data for assessment of the defined critical group members.

EMP PAS results for 2022 can be found in the table in **Appendix F** of this report, along with maps of the position of each sampler in the array. The table shows the average tritium oxide (HTO) concentrations for the samplers located in each of the eight compass sectors for the given sampling period.

Average tritium oxide in air concentrations for each month of 2022 are graphically represented for each of the eight compass sectors, and for each sampled distance from the facility, in **Appendix G** of this report.

The PAS array represents the tritium exposure pathways for inhalation and skin absorption; results are used in the calculations for effective dose to representative persons (members of the public) for 2022.

The sum of the average concentration for the passive air samplers in 2022 was 60.54 Bq/m^3, a value that reflects a decrease of 13% from that observed in 2021 (69.75 Bq/m^3).

Gaseous tritium oxide releases in 2022, as measured as part of the Effluent Monitoring Program, were 8,816 GBq, a value that reflects an increase of 5.1% from that measured in 2021 (8,387 GBq).

Tritium oxide emissions were relatively higher compared to 2021, while both overall tritium emissions (oxide + elemental), and the sum of the average concentrations of all passive air samplers showed a decrease compared to the previous year.

This can mainly be attributed to the fact that the facility processed tritium at a relatively higher rate during the summer months in 2022 (May through September) to meet customer needs.

Processing operations conducted during the warmer and more humid weather of the summer typically lead to higher levels of tritium oxide in the emissions from the facility.

This is corroborated by both the PAS data in **Appendix F**, as well as the weekly gaseous emissions for weeks 19 – 40 in **Appendix O** (64% of tritium oxide, and 57% of total tritium emitted in 2022 over a period of 22 weeks of summer weather).

4.3.1.2 Precipitation Monitoring

Eight precipitation monitors are installed near existing air monitoring stations that are located approximately 250 m from the facility. Precipitation is collected as an aggregate sample over the course of each month, and then analyzed for tritium concentration.

Typically, SRBT's analysis of precipitation samples results in a minimum detectable activity (MDA) of between 19 - 21 Bq/L, a value which can identify significant concentrations of tritium in precipitation, and provides the resolution needed to determine the level of risk to the public and the environment.

Results in 2022 ranged between values that were below the MDA (49.5% of all samples obtained), up to a maximum of 682 Bq/L (sampler 4P for the Sep. 28 – Nov. 2 sample). The average tritium concentration for all eight precipitation monitors in 2022 was 36 Bq/L.

Table 18 summarizes the five-year trends for the average and maximum concentrations of collected precipitation samples for each calendar year.

TABLE 18: PRECIPITATION MONITORING FIVE-YEAR TREND (2018-2022)

DESCRIPTION	2018	2019	2020	2021	2022
AVERAGE CONCENTRATION DURING YEAR (Bq/L)	34	33	34	46	36
MAXIMUM CONCENTRATION DURING YEAR (Bq/L)	217	200	518	560	682

The geographic distribution of the sample collectors, coupled with any given meteorological conditions during and shortly after tritium processing, is expected to yield some variations in the data year-to-year.

Precipitation monitoring results for 2022, along with maps showing locations, and five-year trends for each sampling location, can be found in **Appendix H** of this report.

4.3.1.3 Muskrat River Monitoring

Samples of the Muskrat River downstream from SRBT are collected and analyzed monthly, in duplicate, as part of the EMP.

Typically, SRBT's analysis of Muskrat River samples results in an MDA of around 10 Bq/L, a value which can identify significant or abnormal concentrations of tritium in the river, and provides the resolution needed to determine the level of risk to the public and the environment.

All obtained samples of the river water in 2022 fell below the MDA for tritium concentration, with the exception of the March spot sample, when one of the two duplicate samples was analyzed by SRBT as exhibiting a concentration of 9.67 Bq/L, which was very slightly over the MDA for the analysis (MDA = 9.63 Bq/L for the March river water analysis).

The duplicate sample was measured as lower than the MDA; however, the sample above the MDA was accepted as the representative sample for that period.

Muskrat River monitoring results are trended in **Appendix I** of this report, along with a map showing the location where the sampling is routinely performed.

4.3.1.4 Downspout Runoff Monitoring

Tritium concentrations are measured in all facility downspouts (DS). The samples were collected periodically by SRBT for tritium concentration assessment. Runoff from downspouts was collected during five precipitation events during 2022, with a total of 64 samples being assessed.

The complete set of data for 2022 can be found in **Appendix J**, along with a map of the sample points around the building housing the facility.

The average tritium concentration for all downspouts / facility runoff samples in 2022 was 182 Bq/L; in 2021, this value was 58 Bq/L. Excluding sample results that were less than the MDA the average result in 2022 was 466 Bq/L.

The highest value measured was from snowmelt draining through DS-6 on February 16 (1,118 Bq/L), while the lowest values measured were 39 individual measurements that were less than the MDA of between 35 - 42 Bq/L.

Table 19 summarizes the five-year trends for the average and maximum concentrations of collected downspout runoff samples for each calendar year.

TABLE 19: DOWNSPOUT RUNOFF MONITORING FIVE-YEAR TREND (2018-2022)

DESCRIPTION	2018	2019	2020	2021	2022
AVERAGE CONCENTRATION DURING YEAR (Bq/L)	179	432	1,030	58	182
MAXIMUM CONCENTRATION DURING YEAR (Bq/L)	493	1,857	6,766	678	1,118

Downspout monitoring was originally initiated as part of the efforts to characterize sources of tritium impacting the groundwater aquifer beneath the SRBT facility in the mid-2000s. The practice of monitoring the water that is shed from the building rooftop drainage systems (the ‘downspouts’) represents only a very brief snapshot in time of the conditions at the time of sampling.

There is no significant environmental risk from tritium present in downspout water, as demonstrated by the continuing decrease in groundwater tritium concentrations over the past several years.

It is important to recognize that there are several independent factors that influence the measured tritium concentration in any given sample, including:

- Significant rainfall after periods of time with elevated gaseous tritium-oxide releases tend to result in higher downspout concentrations being measured.
- How long it has been since a significant rainfall event has occurred – drier periods with high rates of tritium processing, followed by a significant rainfall tend to result in higher measured concentrations.
- The overlap between the time the rainfall event began and was detected, and the time it took to put tritium processing operations into a safe state. On occasion, quick onset of a heavy rainfall event can result in probable deposition from entrainment of any released tritium as processing operations are shut down.
- The time between the onset of precipitation and the act of obtaining the samples – the longer amount of time between these events, the lower the concentration of tritium is expected to be.
- Higher rainfall rates can lead to lower concentrations due to the sheer volume of water being drained; however, higher rates of rain can also cause rooftop ponding which will entrain surface tritium that may not have otherwise been taken up by a less intense rainfall.
- Weather factors during processing can influence deposition patterns. Rainfall that occurs quickly after periods of processing where west to east wind patterns dominate have a greater impact on downspout results, as opposed to other wind directions, since the active ventilation system effluent plume will drift over the facility.

4.3.1.5 Produce Monitoring

Produce from a local produce stand and from five local residential gardens were sampled in 2022.

The samples were collected and assessed by a third-party laboratory to establish free-water tritium concentration, as well as an assessment of organically-bound tritium (OBT) in specific samples (produce sample minimum detectable activity = approximately 1.4 Bq/L of sample water measured; MDA per kilogram dependent on water content ratio of a given sample type).

The official results were compiled and reported to the participating members of the public, and are also posted on our website. This data is used in the calculations for annual estimated dose to the public for 2022.

The average free water tritium concentration in all produce offered by local residents in 2022 was 17.0 Bq/kg, compared to the previous year's value of 60.7 Bq/kg.

The maximum measured value in 2022 was 99 Bq/kg measured in a sample of tomatoes; this measurement represents less than 0.1% of the SRBT benchmark value, as well as the CNSC Independent Environmental Monitoring Program screening value for free water tritium in fresh produce.

The average free water tritium concentration in locally-grown produce offered by commercial entities was measured as 3.0 Bq/kg, a measurement that is identical to the value of 3 Bq/kg obtained in 2021 from the same commercial farm gate.

For OBT, samples of tomatoes from a nearby residential garden showed a concentration of 6 Bq OBT/kg; a sample of apples from a nearby tree on residential property showed a concentration of 7 Bq OBT/kg; and finally, tomatoes from the commercial garden were measured at 2 Bq OBT/kg.

Produce monitoring results and maps showing produce sampling locations for calendar year 2022 can be found in **Appendix K** of this report, along with graphs comparing the five-year trends of each location.

4.3.1.6 Milk Monitoring

Milk from both a local producer and from a local distributor is sampled every six months. The samples were collected and analyzed for tritium concentration by a qualified third-party laboratory. This data is also used in the calculations for critical group annual estimated dose for 2022.

Tritium concentrations in milk remained very low; all assayed samples were reported by the third-party laboratory to have measured less than the MDA of 4 Bq/L. Milk monitoring results for 2022 can be found in **Appendix L** of this report.

4.3.1.7 Weather Data

A weather station near the facility collects data on a continuous basis. See weather data for 2022 in **Appendix M**.

Note that beginning with the July 2022 data, it became apparent that the weather station precipitation sensor had malfunctioned. A period of downtime followed while corrective maintenance and component replacement were planned. The precipitation functions of the weather station were fully restored in November 2022.

Weather data is primarily used as part of the continuous meteorological characterization of the site over time, in support of the establishments of Derived Release Limits and the Environmental Risk Assessment. The loss of precipitation data over the time period in question has no bearing on operational safety or compliance.

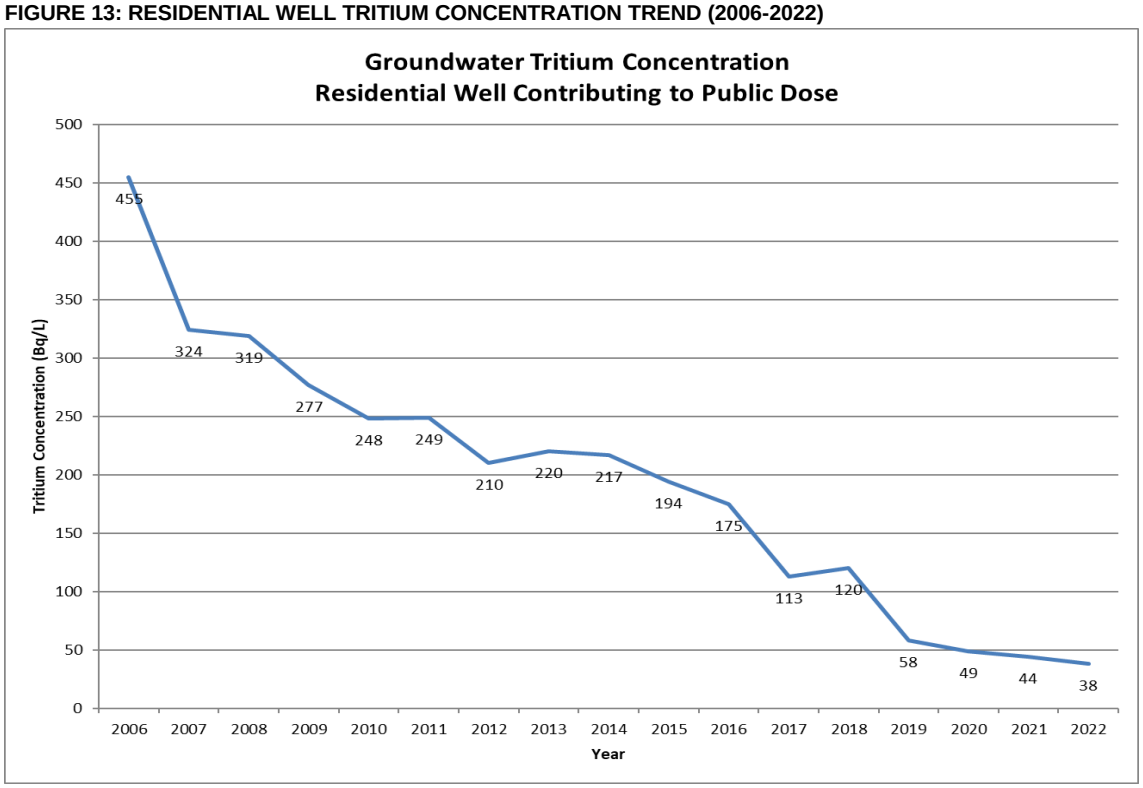
4.3.1.8 Residential Drinking Water

Several nearby local residences permit SRBT to acquire samples of drinking water during the year, to provide additional data for our program. A qualified, independent third-party laboratory collects and analyzes residential drinking water samples (MDA = approximately 3 – 4 Bq/L).

In 2022, the highest residential well tritium concentration value was measured as 38 Bq/L (in September at RW-3), a value that is well below the Ontario Drinking Water Quality Standard of 7,000 Bq/L. In 2021, the highest measured value was measured as 44 Bq/L (in July 2021 from RW-3).

Figure 13 illustrates the trend in maximum sampled tritium concentration in all sampled residential wells, since the program of monitoring began in 2006.

FIGURE 13: RESIDENTIAL WELL TRITIUM CONCENTRATION TREND (2006-2022)



Derived public dose values attributed to residential well water consumption have decreased since the inception of the monitoring program as a direct result of our efforts to minimize our environmental impact.

Residential well monitoring results for 2022 can be found in **Appendix N** of this report.

4.3.1.9 Deviations from Field Sampling Procedures

In 2022, there were no noted occurrences of deviations from field sampling procedures.

SRBT performs field sampling activities in accordance with internal procedures for the following sample types:

- EMP passive air sampling
- Precipitation
- Muskrat River
- Facility downspouts

Qualified independent service providers continue to sample and/or analyze the following sample types:

- Produce
- Milk
- Residential drinking water
- Sludge cake from the Pembroke Pollution Control Centre

4.3.1.10 Deviations from Analytical and Data Management Procedures

In 2022, there were no noted occurrences of deviations from analytical and data management procedures.

SRBT routinely analyzes the following sample types, in accordance with internal procedures:

- EMP passive air sampling
- Precipitation
- Muskrat River
- Facility downspouts

Qualified independent service providers continue to analyze the following sample types:

- Produce
- Milk
- Residential drinking water
- Sludge cake from the Pembroke Pollution Control Centre

SRBT manages all EMP data in accordance with controlled procedures; there were no deviations from these procedures in 2022.

4.3.1.11 Field and Laboratory QA/QC Results and Non-conformances

Field and laboratory EMP operations include several quality assurance and quality control (QA/QC) activities.

Field QA/QC activities include duplicate sampling of five passive air sampler stations, duplicate sampling of the Muskrat River, and the use of trip / method blanks for samples obtained in the field.

Laboratory QA/QC activities include duplicate samples and blanks, as well as laboratory reference standards. Sample QC is tested using spike recovery and relative percent difference (RPD) tests.

The following table illustrates the five-year trend in pertinent QA/QC acceptance criteria data for the EMP:

TABLE 20: EMP QUALITY CONTROL DATA (2018-2022)

CALENDAR YEAR	2018	2019	2020	2021	2022
BENCHMARK VALUE EXCEEDANCES	0	0	0	0	0
DUPLICATE RPD EXCEEDANCES	1	4	10	7	1
REFERENCE STANDARD ACCURACY EXCEEDANCES	0	0	0	0	0
BLANK SAMPLE COUNT RATE > MAX ACCEPTABLE	0	0	0	0	0
SAMPLE ACQUISITION SUCCESS RATE	98.8%	98.5%	98.5%	98.6%	99.5%
QC CHECK PASS RATE	99.6%	98.3%	96.6%	99.2%	99.9%

In 2022, 641 of 644 planned, routine environmental samples were successfully obtained. Samples not successfully obtained included:

- One PAS sample was lost while deployed in the field (SE2000 on March 1 collection date, sampler blown down by wind),
- One precipitation sample was spoiled in the field (March 1 – April 5 collection period), and
- One downspout (DS-2) did not drain sufficient water for sampling during a rain event in May.

A total of 851 of 852 EMP acceptance criteria / QC checks / benchmark value comparisons passed their check (99.9%). Most importantly, no measured EMP sample exceeded established benchmark values in 2022.

The sole failed QC check related to the derivation of an RPD greater than 40% between two duplicate sample results for passive air sampling at NE250. SRBT deploys duplicate samplers at four locations within 250 m of the facility.

For the samples deployed between May 4 – June 1, the two samplers at NE250 returned derived results of 1.29 and 16.54 Bq/m^3, respectively. A recount of the samples confirmed these values.

An investigation into the possible cause of such a difference between the two samplers was inconclusive; however, it was deemed that the most likely explanation was that the higher sample may have become contaminated during sample collection.

A technical memo was recorded where the investigation was summarized; ultimately, the higher value of 16.54 Bq/m^3 was assigned to the sample location for the given time period, although there was very probable that the true value was more in line with the lower sampler value.

During the next month’s sample collection, both PAS orifices were blown out with compressed air, and rinsed with water to remove any surface contamination that may have been present. There have been no RPD failures at this location since.

4.3.1.12 Supplementary Studies

The special annual sampling campaign (SASC) was conducted for the second consecutive year, focused on environmental media that had not been traditionally sampled as a matter of routine under the SRBT EMP prior to the ERA process having been completed in 2021.

The data collected as a result of the SASC will be used as input into future revisions of the ERA.

The sample types obtained in 2022 included:

- Muskrat River water at two alternate locations,
- Muskrat River sediment,
- Riparian and aquatic vegetation in and near the Muskrat River,
- Organically-bound tritium in sampled milk,
- Average tritium concentration in air at the Pembroke Pollution Control Centre,
- Sampling of various plants that are culturally or economically significant to the Algonquins of Pikwakanagan First Nation (AOPFN).

In lieu of sampling plants within the community of Pikwakanagan, this year plants were instead sampled at various distances between the SRBT facility and the community of Pikwakanagan.

Plants were gathered at the following distances from the SRBT facility, on a straight geographical line toward Pikwakanagan:

- 1 km (mullein),
- 2 km (chokecherries),
- 6 km (bulrushes),
- 11 km (ferns),
- 16 km (sumac berries),
- 20 km (raspberry leaves),
- 25 km (sumac berries), and
- 27 km (cedar, < 1 km from Pikwakanagan)

This sample plan was designed to help gather data on the concentration of tritium in plants that are important to the AOPFN community, growing within their traditional territory, but not in the actual community itself.

This strategy was chosen to acknowledge that AOPFN harvest activities take place throughout their traditional territory, not solely within the community itself.

The AOPFN raised this specifically as an issue of concern in their intervention during the 2022 licence renewal process, when describing their assessment of the original ERA sample campaign:

> *"AOPFN membership use all our traditional territory to practice our rights, and this "collaborative sampling campaign" did not account for any rights-based activities that AOPFN members may engage in closer to the facility."*
>
> (CMD 22-H8.8, page 17)

The maximum tritium concentration measured in any of the plants sampled as part of this campaign were 5.65 Bq HTO/kg fresh weight (mullein at 1 km distance from SRBT), and 6.29 Bq OBT/kg fresh weight (sumac berries at 16 km distance from SRBT). Applying CSA standard consumption values at the 95th percentile to produce at these concentrations would result in effective doses to adults, children and infants on the order of less 0.2 µSv per year.

It is not expected that traditional use of these plants by Indigenous communities would reasonably result in significant risk to persons or the environment.

For the SASC, in all cases except one, the value for tritium concentration measured in the obtained samples were well below the selected benchmark values, indicating that the assumptions made in the Environmental Risk Assessment are conservative and valid for purpose.

The sole sample that exceeded a benchmark value was for the average concentration of tritium in air at the Pembroke Pollution Control Centre (PPCC). A passive air sampler was set up in the primary clarifier building which houses settling tanks, for a sampling period of 35 days.

The final accepted result of 2.56 Bq/m^3 was marginally above the benchmark value of 2.50 Bq/m^3. This result represents the mathematical average of three measurements of the sampler (3.09, 2.09 and 2.51 Bq/m^3).

An assessment of the hypothetical dose consequences to a worker was documented (estimated workplace dose rose from 0.08 µSv per year in the ERA, to 0.25 µSv per year at a workplace concentration of 3.09 Bq/m^3), and the results filed for future reference in the ERA when it is next up for review.

As demonstrated by the very small associated dose, this benchmark value exceedance does not present any significant risk to workers at the PPCC.

The SASC will be conducted again in 2023, with sample selection and benchmark values to be determined in consultation with stakeholders where feasible.

4.3.2 Effluent Monitoring

SRBT monitors two main effluent streams from the facility for tritium as part of our Effluent Monitoring Program (EffMP).

Tritium releases via the gaseous effluent pathway (active ventilation) are monitored in real time using 'bubbler' capture systems, with integrated measurements being conducted weekly to determine total emissions and verify compliance with licence limits and action levels.

Liquid effluent is retained in batches and analyzed for tritium concentration prior to being released to sewer.

4.3.2.1 Gaseous Effluent

In 2022, SRBT operated well within release limits to atmosphere that are described in the Licence Conditions Handbook associated with NSPFL-13.00/2034.

A summary of the releases of tritium oxide and total tritium in 2022 is tabled below:

TABLE 21: GASEOUS EFFLUENT DATA (2022)

NUCLEAR SUBSTANCE AND FORM	ANNUAL LIMIT (GBq)	2022 RELEASED (GBq)	% LIMIT	WEEKLY AVERAGE (GBq)	HIGHEST WEEKLY RELEASE (GBq)
TRITIUM AS TRITIUM OXIDE (HTO)	67,200	8,816	13.12%	166	468 *(Jun. 14-21)*
TOTAL TRITIUM AS TRITIUM OXIDE (HTO) AND TRITIUM GAS (HT)	448,000	26,590	5.94%	502	1,501 *(Nov. 22-29)*

Please refer to **Appendix O** for a complete data set on tritium releases to atmosphere in 2022.

Details on the past five years of gaseous effluent data are provided in the following table for ease of trend analysis:

TABLE 22: GASEOUS EFFLUENT FIVE-YEAR TREND (2018-2022)

NUCLEAR SUBSTANCE AND FORM	2018 (GBq)	2019 (GBq)	2020 (GBq)	2021 (GBq)	2022 (GBq)
TRITIUM OXIDE (HTO)	10,741	11,858	9,755	8,387	8,816
TOTAL TRITIUM AS TRITIUM OXIDE (HTO) AND TRITIUM GAS (HT)	33,180	31,769	25,186	28,729	26,590

When analyzing the operation's performance at reducing emissions it is important to assess the releases to atmosphere against the amount of tritium the facility processed. This provides an indication of how effective emission reduction initiatives have been successful in reducing emissions.

The following table defines the ratio of tritium released to atmosphere against tritium processed in the past five years.

TABLE 23: TRITIUM RELEASED TO ATMOSPHERE vs PROCESSED (2018-2022)

YEAR	TRITIUM RELEASED TO ATMOSPHERE (GBq/YEAR)	TRITIUM PROCESSED (GBq/YEAR)	% RELEASED TO PROCESSED	% INCREASE (+) REDUCTION (-)
2018	33,180	31,251,329	0.11	+38%
2019	31,769	30,327,048	0.10	-10%
2020	25,186	27,887,498	0.09	-10%
2021	28,729	29,392,257	0.10	+11%
2022	26,590	26,940,372	0.10	No change

In 2022, the ratio of tritium released versus processed remained stable compared to 2021. SRBT was able to achieve our internal target for this metric of ≤ 0.11% for the year.

4.3.2.2 Air Emission Targets

SRBT set an annualized total tritium emission target at the beginning of 2022 of ≤ 625 GBq / week (averaged over the year), and was successful in meeting this target (511 GBq / week).

For calendar year 2023, SRBT has retained an identical tritium emission target of ≤ 625 GBq / week, on average, based upon projected production rates and the value achieved in 2022.

The 2022 targeted tritium released to processed ratio of ≤ 0.11% was achieved (0.10%). The 2023 target has been kept set at ≤ 0.11%.

4.3.2.3 Liquid Effluent

In 2022, SRBT operated well within release limit to sewer that are described in the Licence Conditions Handbook associated with NSPFL-13.00/2034.

TABLE 24: LIQUID EFFLUENT DATA (2022)

NUCLEAR SUBSTANCE AND FORM	LIMIT (GBq/YEAR)	RELEASED (GBq/YEAR)	% OF LIMIT
TRITIUM – WATER SOLUBLE	200	1.49	0.74%

Total liquid effluent releases in 2022 decreased when compared to 2021 values (1.49 GBq in 2022 vs. 3.07 GBq in 2021).

Details on the past five years of liquid effluent data are provided in the table below for ease of trend analysis:

TABLE 25: LIQUID EFFLUENT FIVE-YEAR TREND (2018-2022)

NUCLEAR SUBSTANCE AND FORM	2018 (GBq)	2019 (GBq)	2020 (GBq)	2021 (GBq)	2021 (GBq)
TRITIUM – WATER SOLUBLE	10.02	13.67	5.56	3.07	1.49

Please refer to **Appendix P** for a complete data set of liquid effluent releases to sewer in calendar year 2022.

4.3.2.4 Liquid Effluent Target

SRBT set a total tritium release target at the beginning of 2022 of ≤ 10 GBq for the year, a target that was achieved. SRBT has set the total liquid effluent release target at 8 GBq for 2023.

4.3.2.5 Action Level Exceedances

In 2022, there were no instances of an action level exceedance related to gaseous or liquid effluent monitoring at SRBT.

4.3.2.6 Summary of Field and Laboratory QA/QC

Effluent monitoring activities include several procedural steps that ensure acceptable quality assurance and control, including duplicate / triplicate sample acquisition and measurement, the use of process blanks, and the measurement of known reference standards as part of the assay of activity in collected sample media.

All EffMP QA/QC results obtained in 2022 were acceptable with no identified non-conformances.

4.3.2.7 Statement of Uncertainties Inherent in Monitoring Results

Uncertainties associated with effluent monitoring at SRBT may be present at several points in the process.

For gaseous effluent, such uncertainties include: sampling representativeness, total airflow collected, catalytic efficiency of HT to HTO conversion, capture efficiency of sample media, standard measurement errors associated with liquid scintillation counting, sample acquisition errors such as volume of drawn sample for analysis, and errors in stack flow rate and differential pressure measurement.

For liquid effluent, such uncertainties include: sample volume, liquid effluent volume, standard measurement errors associated with liquid scintillation counting, and sample acquisition errors such as volume of drawn sample for analysis.

In order to ensure that the uncertainties inherent in monitoring results are kept acceptably low, SRBT ensures that a third-party laboratory conducts independent verification procedures of effluent monitoring processes on an annual basis. The acceptance criterion for deviation between the assessed measurements is +/-30%. In 2022, all results were within this acceptance

criteria. SRBT measurements ranged between 77-93% of those obtained by the independent third party for gaseous effluent monitoring, and 84% for a spot sample of liquid effluent.

The QA/QC processes associated with SRBT effluent monitoring contribute to the confidence in the results. As well, the data gathered from the EMP is assessed against the data from the gaseous effluent monitoring process on a frequent basis to verify that results are relatively consistent with each other.

The inherent uncertainties associated with effluent monitoring are well within acceptable bounds when contrasted against the measured releases, and the licenced limits for releases by each pathway.

4.3.2.8 Supplementary Studies

In 2022, no supplementary studies were conducted relating to effluent monitoring at SRBT.

4.3.2.9 Hazardous Substance Releases

In 2022, SRBT continued to operate the facility under a Certificate of Approval (Air), number 5310-4NJQE2, issued by the Ontario Ministry of the Environment in accordance with section 9 of the Ontario Environmental Protection Act.

No hazardous non-radiological substances are released from the facility through either gaseous or liquid effluent pathways in any significant quantity.

4.3.3 Groundwater Monitoring

SRBT implements and maintains a comprehensive Groundwater Monitoring Program (GMP) as part of our Groundwater Protection Program.

Dedicated, engineered sampling wells are used to establish tritium concentrations in the groundwater each month at various depths and in differing geologic strata. Variations are trended over time to measure the response of historical contamination of the local aquifer.

Since the program was established, groundwater measurements and trends have been in very good agreement with established hydrogeological modelling predictions.

While most of the released tritium in the air is dispersed, some of it will reach the soil through dry and wet deposition. Infiltrated precipitation brings tritium into the groundwater below it. The deposition of tritium on and around the facility from air emissions and resulting soil moisture and standing water are the sole direct contributor to tritium found in groundwater. Groundwater is affected by the percolation of soil moisture and standing water from the surface.

Tritium concentrations in groundwater are expected to gradually decrease once all historical emissions have flushed through the system and/or decayed with some influence of higher concentrations in nearby wells from lateral underground water flow. This continues to be confirmed by routine monitoring of the existing network of wells. The rate at which this decrease occurs is dependent on the level and speed of recharge of the groundwater on and around the SRBT facility.

4.3.3.1 Groundwater Tritium Concentration

Groundwater monitoring well results for 2022 can be found in **Appendix N** of this report.

MW06-10: The highest average tritium concentration in any well remains in monitoring well MW06-10 which is directly beneath the area where the active ventilation stacks are located. As of the end of 2022, this represents the only well where tritium concentration exceeds the Ontario Drinking Water Guideline value of 7,000 Bq/L.

The average concentration of tritium measured in MW06-10 in 2022 was 26,163 Bq/L, a value that is lower than the average measured in 2021 (30,153 Bq/L).

A graph trending the average annual concentration of tritium in MW06-10 since commissioning of the well is provided in Figure 14, while the five-year trend is highlighted in Figure 15 in red, along with trends of the maximum (green) and minimum (blue) monthly measurements each year.

FIGURE 14: MW06-10 AVERAGE TRITIUM CONCENTRATION TREND (2006-2022)

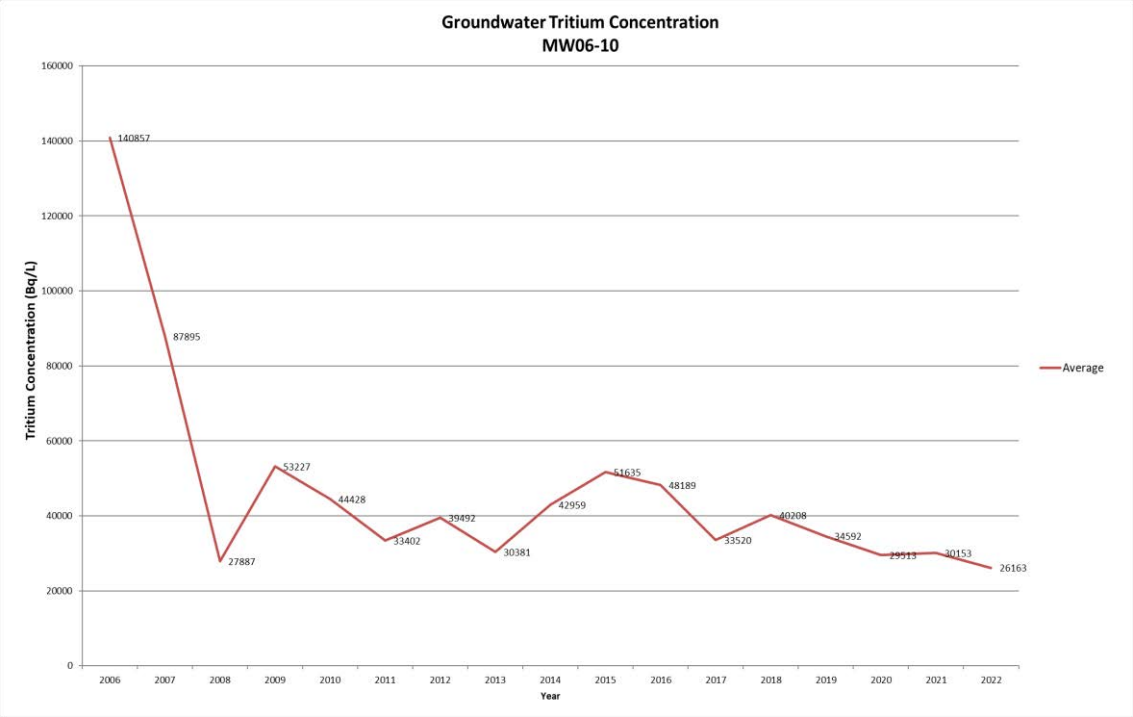
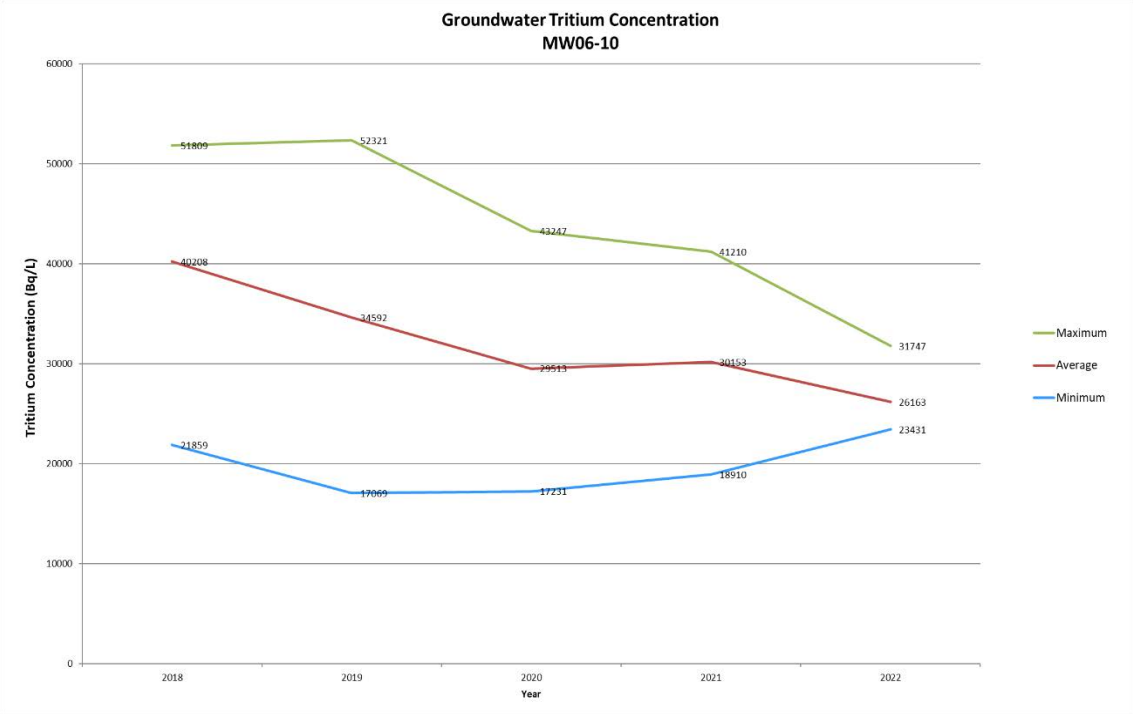


FIGURE 15: MW06-10 FIVE-YEAR TREND (2018-2022)

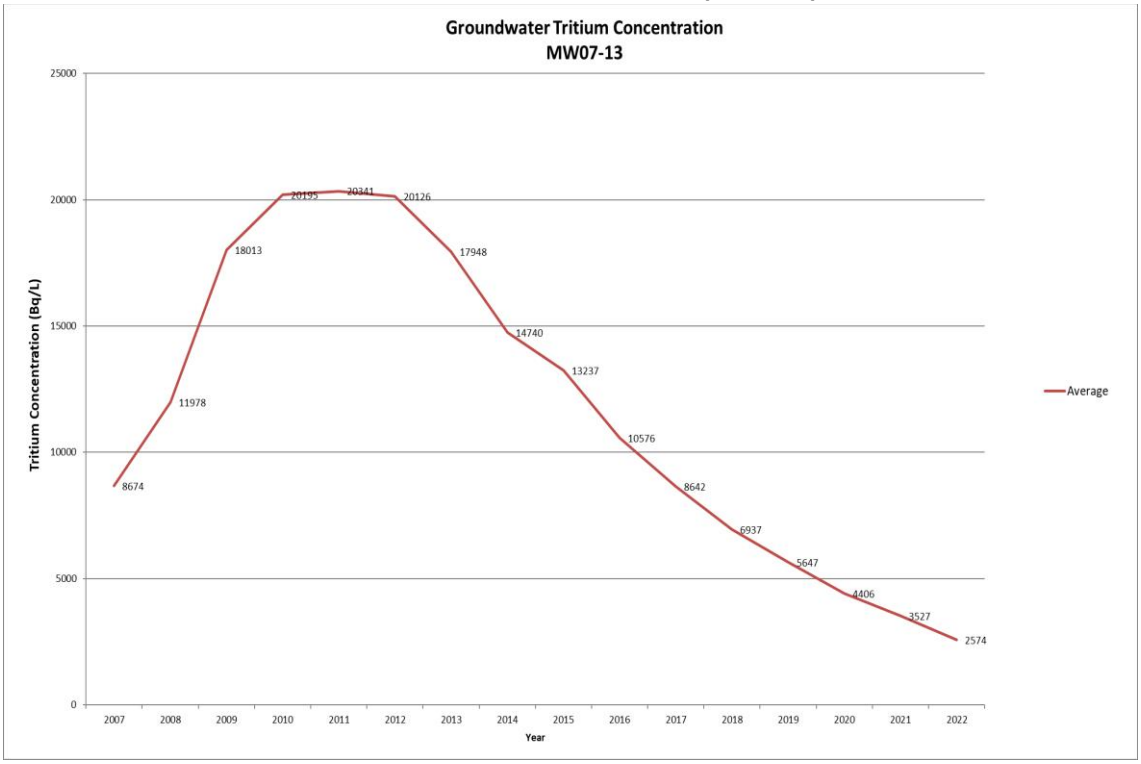


MW07-13: The average concentration of MW07-13 continues to fall; in 2022 the average measurement was 2,574 Bq/L. This well exhibits the highest tritium concentration of any monitoring well, other than MW06-10.

This well was the last monitoring well to have been measured above the provincial drinking water guideline value of 7,000 Bq/L (April 2018), other than MW06-10. The concentration of tritium at this location has continued to consistently trend downward over time.

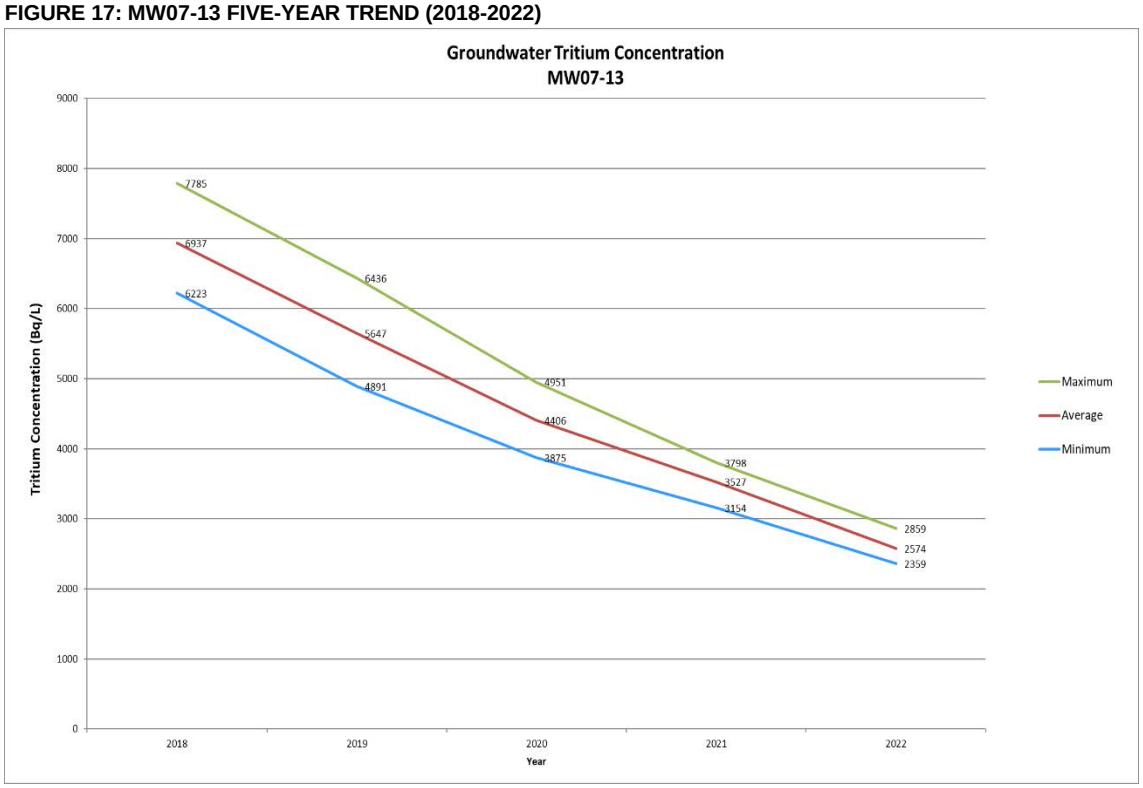
A graph trending the average annual concentration of tritium in MW07-13 since commissioning of the well is Figure 16.

FIGURE 16: MW07-13 AVERAGE TRITIUM CONCENTRATION TREND (2007-2022)



The five-year trend is highlighted in Figure 17 in red, along with trends of the maximum (green) and minimum (blue) monthly measurements each year.

FIGURE 17: MW07-13 FIVE-YEAR TREND (2018-2022)



Looking back over the past several years, tritium concentrations in all monitoring wells have continued to decline.

The average annual concentration across all dedicated monitoring wells in 2022 is less than 40% of average in 2015. Well MW06-1 has shown the greatest change (90% decrease compared to 2015 conditions), while MW07-12 exhibited the smallest change (10% decrease).

In 2022, 29 out of 29 SRBT-installed groundwater monitoring wells exhibited an average tritium concentration that was lower than the previous year.

Table 26 compares the annualized average tritium concentration of the 29 dedicated, SRBT-installed groundwater monitoring wells for eight years, between 2015 through 2022.

Comparisons are made in the columns on the right-hand side of the table using a three-colour gradient, where green indicates decreasing concentrations, white indicating stable, and red indicating a relative increase for the years being compared.

TABLE 26: 2015-2022 AVERAGE TRITIUM CONCENTRATION IN MONITORING WELLS

Well ID	2022	2021	2020	2019	2018	2017	2016	2015	2022/2021	2022/2020	2022/2019	2022/2018	2022/2017	2022/2016	2022/2015
	(Annualized average tritium Bq/L)									(%)					
MW06-1	456	651	762	1,045	1,334	1,946	2,753	4,338	70.0	59.8	43.6	34.1	23.4	16.5	10.5
MW06-2	609	736	877	1,031	1,160	1,166	1,467	1,965	82.7	69.5	59.1	52.5	52.3	41.5	31.0
MW06-3	166	199	244	367	469	683	1,029	1,218	83.4	67.9	45.2	35.4	24.3	16.1	13.6
MW06-8	507	550	579	679	724	780	848	906	92.2	87.5	74.7	70.0	65.0	59.8	56.0
MW06-9	1127	1,366	1,527	1,774	1,952	2,224	2,476	2,731	82.5	73.8	63.5	57.7	50.7	45.5	41.3
MW06-10	26163	30,153	29,513	34,592	40,208	33,520	48,189	51,635	86.8	88.6	75.6	65.1	78.1	54.3	50.7
MW07-11	811	858	924	1,053	1,122	1,099	1,344	1,521	94.6	87.8	77.0	72.3	73.8	60.4	53.3
MW07-12	416	435	422	425	468	467	469	463	95.6	98.7	98.0	89.0	89.1	88.7	89.8
MW07-13	2574	3,527	4,406	5,647	6,937	8,642	10,576	13,237	73.0	58.4	45.6	37.1	29.8	24.3	19.4
MW07-15	1004	1,076	1,262	1,399	1,505	1,617	1,810	1,680	93.3	79.6	71.8	66.7	62.1	55.5	59.8
MW07-16	685	897	1,003	1,240	1,433	1,649	1,879	2,188	76.3	68.3	55.2	47.8	41.5	36.5	31.3
MW07-17	267	296	272	338	359	335	602	780	90.1	98.2	78.9	74.3	79.7	44.3	34.2
MW07-18	842	1,102	1,494	2,000	2,192	2,739	3,690	5,491	76.4	56.3	42.1	38.4	30.7	22.8	15.3
MW07-19	665	959	1,198	1,468	1,889	1,926	2,500	3,222	69.3	55.5	45.3	35.2	34.5	26.6	20.6
MW07-20	244	296	326	438	498	571	670	775	82.5	74.8	55.8	49.0	42.7	36.4	31.5
MW07-21	351	363	393	545	778	879	1,009	1,121	96.6	89.3	64.4	45.1	40.0	34.8	31.3
MW07-22	639	729	783	921	974	1,023	1,131	1,171	87.7	81.6	69.4	65.7	62.5	56.5	54.6
MW07-23	1013	1,147	1,252	1,443	1,572	1,743	1,929	2,206	88.3	80.9	70.2	64.4	58.1	52.5	45.9
MW07-24	1340	1,511	1,644	1,839	1,928	2,022	2,206	2,314	88.6	81.5	72.8	69.5	66.3	60.7	57.9
MW07-26	291	421	514	697	904	1,190	1,491	1,941	69.0	56.5	41.7	32.1	24.4	19.5	15.0
MW07-27	1439	1,696	1,994	2,683	3,136	3,589	4,292	4,869	84.9	72.2	53.6	45.9	40.1	33.5	29.6
MW07-28	520	670	705	843	1,017	1,063	1,311	1,446	77.6	73.8	61.7	51.2	48.9	39.7	36.0
MW07-29	760	1,075	1,485	2,058	2,415	2,472	3,395	3,950	70.7	51.2	36.9	31.5	30.7	22.4	19.2
MW07-31	240	325	182	352	407	186	440	756	73.8	131.9	68.2	58.9	129.0	54.5	31.7
MW07-32	42	54	59	75	70	76	155	128	76.4	70.3	55.3	59.7	54.6	26.8	32.5
MW07-34	908	1,153	1,297	1,526	1,889	2,291	2,822	3,312	78.7	70.0	59.5	48.0	39.6	32.2	27.4
MW07-35	1297	1,550	1,898	2,256	2,637	3,015	3,448	3,945	83.6	68.3	57.5	49.2	43.0	37.6	32.9
MW07-36	1105	1,154	1,468	1,716	2,008	2,109	2,618	2,892	95.7	75.3	64.4	55.0	52.4	42.2	38.2
MW07-37	677	717	763	821	830	871	989	1,009	94.4	88.8	82.5	81.6	77.7	68.5	67.1
AVERAGE	**1,626**	**1,920**	**2,043**	**2,458**	**2,856**	**2,824**	**3,708**	**4,249**	**84.7**	**79.6**	**66.2**	**56.9**	**57.6**	**43.8**	**38.3**

Several factors can influence the concentration of tritium in any given well, including the rate of precipitation accumulation, contaminant dispersion patterns, and the lateral and vertical migration of historical contaminant plumes. Measured concentrations may also be reflective of operational conditions from many years ago.

4.3.3.2 Groundwater Level Measurements

The water levels are measured in monitoring wells prior to purge and sampling. Analysis of this data shows consistent trends from year to year when comparing season to season.

A compilation of groundwater level measurements for 2022 can be found in **Appendix Q** of this report.

4.3.3.3 Summary of Field and Laboratory QA/QC

Field and laboratory operations pertaining to groundwater monitoring include several quality assurance and quality control activities.

Quality control activities include duplicate sampling of certain wells, duplicate laboratory subsampling, and the use of trip / method blanks during sampling campaigns.

As well, several quality control checks are performed as part of the liquid scintillation counting procedures employed by both the third party and SRBT.

In 2022, 115 samples of groundwater were successfully obtained and analyzed, with all planned groundwater monitoring activities being accomplished, except for one instance where MW06-3 was found to be dry in March.

As such, 99.1% of all GMP samples were successfully obtained and measured in 2022, which is an excellent rate of sampling success.

There were no failures of field or laboratory quality control checks for GMP data during 2022.

SRBT's Groundwater Monitoring Program requires the completion of an inter-laboratory testing exercise on an annual basis. This exercise is typically completed during the June sampling period.

Five groundwater monitoring wells were sampled by SRBT in duplicate on June, and were subsequently analyzed for tritium concentration by both SRBT and a qualified, independent laboratory.

The results obtained fell well within the acceptance criteria of +/-20% relative difference, adding confidence in the quality and accuracy of the data generated by the program.

4.3.3.4 Statement of Uncertainties Inherent in Monitoring Results

Uncertainties associated with SRBT groundwater monitoring may be present at certain points in the process.

The main uncertainties relate to standard measurement errors associated with liquid scintillation counting, and sample acquisition errors such as volume of drawn sample for analysis.

In order to provide assurance of accuracy and precision, SRBT conducts an annual intercomparison sampling and analysis activity with our primary contracted third party in June, as required by the GMP.

Five wells were sampled and measured by SRBT concurrently with the third party, with good agreement between the results obtained in-house and those obtained by the contracted service provider.

The inherent uncertainties associated with groundwater monitoring are well within acceptable bounds when contrasted against the tritium concentrations that may present an unacceptable risk to the public.

4.3.3.5 Supplementary Studies

In 2022, no supplementary studies were conducted relating to groundwater monitoring at SRBT.

4.3.3.6 Data Quality, Performance and Acceptance Criteria

Overall, the quality of data gathered as part of SRBT groundwater monitoring activities is successful in ensuring a high level of performance in monitoring, and in demonstrating that acceptance criteria (such as the limits on dose to the public) continue to be met.

All trip blanks, field duplicates, laboratory duplicates and quality control checks during liquid scintillation counting met performance criteria throughout 2022.

4.3.3.7 Program Objectives and Conceptual Site Model

The main objective of the GMP implemented by SRBT is to provide information to assess risks from site-affected groundwater to human health and the environment, ultimately to determine if the risk to the environment and the public from SRBT operations remains acceptably low.

Only one well monitored on a regular basis exceeds the Ontario Drinking Water Guideline value of 7,000 Bq/L. This well is a dedicated, engineered groundwater monitoring well very near to the facility within a secured area, and is not available to be used as a source of water consumption.

With respect to the conceptual site model, the highest average concentration of potable groundwater obtained from a residential well continues to show a generally stable or decreasing trend over time (see discussion in section 4.3.1.8 earlier in this report).

SRBT concludes that the comprehensive array of groundwater monitoring activities conducted continue to meet program objectives, and adheres to the conceptual site model developed as part of the Environmental Management System, as illustrated earlier in this report in Figure 8.

4.3.4 Other Monitoring

On occasion SRBT conducts monitoring of other environmental media in order to provide continued assurance of the safety of our operations.

4.3.4.1 Soil Monitoring

No soil monitoring was conducted in 2022.

4.3.4.2 Sludge Monitoring

In March and September 2022, SRBT collected routine samples of sludge cake from the Pembroke Pollution Control Centre.

These samples are analyzed for the concentration of tritium in the free water contained within (expressed in Bq/L), as well as for organically-bound tritium in the dry mass of material (expressed in Bq/kg).

Sludge data does not factor into the calculation of public dose; however, given previously expressed stakeholder interest, SRBT has integrated sludge cake monitoring as part of the routine EMP activities.

All sludge samples are analyzed by an independent laboratory. The averaged annual results obtained for the past five years are tabled below.

TABLE 27: SLUDGE MONITORING (2018-2022)

NUCLEAR SUBSTANCE AND FORM	2018	2019	2020	2021	2022
FREE-WATER TRITIUM (Bq/L)	40	41	31	30	44
OBT FRESH WEIGHT (Bq/kg)	420	216	260	167	468

4.3.5 Public Dose

The calculation methods used to determine the dose to the representative persons as defined in the SRBT EMP are described in the program and in procedure EMP-014, *Interpretation and Reporting Requirements for EMP Data.*

All data and tables relating to the calculation of the dose to the public can be found in **Appendix R**.

For 2022, the dose has been calculated using the effective dose coefficients found in Canadian Standards Association (CSA) Guideline N288.1-14[17].

TABLE 28: CSA GUIDELINE N288.1-14 EFFECTIVE DOSE COEFFICIENTS FOR H-3

AGE GROUP	EFFECTIVE DOSE COEFFICIENT – INHALATION (HTO) (µSv/Bq)	EFFECTIVE DOSE COEFFICIENT – INGESTION (HTO) (µSv/Bq)	EFFECTIVE DOSE COEFFICIENT – INGESTION (OBT) (µSv/Bq)
INFANT	8.0E-5	5.3E-5	1.3E-4
CHILD	3.8E-5	2.5E-5	6.3E-5
ADULT	3.0E-5	2.0E-5	4.6E-5

NOTE: The dose coefficients listed for inhalation account for skin absorption, as per Table C.1 of N288.1-14.

The dose assessed for the group of representative persons is a summation of:

- Tritium uptake from inhalation and absorption through skin at the place of residence and/or the place of work, ($P_{(i)19}$ and $P_{(e)19}$), and
- Tritium uptake due to consumption of well water (P_{29}), and
- Tritium uptake due to consumption of produce (P_{49}), and
- Tritium uptake due to consumption of dairy products (P_{59}).

Dose due to inhalation

The closest residence to SRBT is located by passive air sampler NW250 approximately 240 meters from the point of release. The 2022 average concentration of tritium oxide in air at passive air sampler NW250 has been determined to be **3.32 Bq/m^3**.

Three passive air samplers are located close to the SRBT facility and represent the tritium oxide in air ($P_{(i)19}$ and $P_{(e)19}$) concentrations for the representative person (adult worker) at samplers 1, 2, and 13. The sampler indicating the highest tritium oxide in air concentration is used to calculate the P_{19} dose values while at work. The highest average result for 2022 between these samplers is **5.75 Bq/m^3** at PAS # 1.

Using the inhalation rates found in CSA Guideline N288.1-14[18], and assuming 2,080 hours (23.744%) of work per year with 6,680 hours (76.256%) at home (a total of 8,760 hours per year):

TABLE 29: CSA GUIDELINE N288.1-14 INHALATION RATES

AGE GROUP	INHALATION RATE (m^3/a)
INFANT	2,740
CHILD	7,850
ADULT	8,400

$P_{(i)19}$: Adult worker dose due to HTO inhaled at residence

The average value for tritium oxide in air for the sampler taken as representing the place of residence for the defined representative person equals 3.32 Bq/m^3.

$P_{(i)19r}$ = [H-3_{air}] (Bq/m^3) x Resp. Rate (m^3/a) x Occup. Factor x DCF_{H3} (µSv/Bq)
= 3.32 Bq/m^3 x 8,400 m^3/a x 0.76256 x 3.0E-05 µSv/Bq
= 0.638 µSv/a

$P_{(i)19}$: Adult worker dose due to HTO inhaled at work

Taking the highest concentration between Passive Air Samplers #1, #2, and #13 is Passive Air Samplers #1 at 5.75 Bq/m^3.

$P_{(i)19w}$ = [H-3_{air}] (Bq/m^3) x Resp. Rate (m^3/a) x Occup. Factor x DCF_{H3} (µSv/Bq)
= 5.75 Bq/m^3 x 8,400 m^3/a x 0.23744 x 3.0E-05 µSv/Bq
= 0.344 µSv/a.

$P_{(i)19}$: Adult resident dose due to HTO inhaled at residence

The average value for tritium oxide in air for the sampler representing the place of residence for the defined representative person equals 3.32 Bq/m^3:

$P_{(i)19}$ = [H-3_{air}] (Bq/m^3) x Resp. Rate (m^3/a) x DCF_{H3} (µSv/Bq)
= 3.32 Bq/m^3 x 8,400 m^3/a x 3.0E-05 µSv/Bq
= 0.837 µSv/a

$P_{(i)19}$: Infant resident dose due to HTO inhaled at residence

The average value for tritium oxide in air for the sampler representing the place of residence for the defined representative person equals 3.32 Bq/m^3:

$P_{(i)19}$ = [H-3_{air}] (Bq/m^3) x Resp. Rate (m^3/a) x DCF_{H3} (µSv/Bq)
= 3.32 Bq/m^3 x 2,740 m^3/a x 8.0E-05 µSv/Bq
= 0.728 µSv/a

$P_{(i)19}$: Child resident dose due to HTO inhaled at residence

The average value for tritium oxide in air for the sampler representing the place of residence for the defined representative person equals 3.32 Bq/m^3:

$P_{(i)19}$ = [H-3_{air}] (Bq/m^3) x Resp. Rate (m^3/a) x DCF_{H3} (µSv/Bq)
= 3.32 Bq/m^3 x 7,850 m^3/a x 3.8E-05 µSv/Bq
= 0.990 µSv/a

Dose due to skin absorption

Beginning in 2016, the dose due to skin absorption is wholly accounted for by the application of the inhalation dose conversion factors applied above.

Please see CSA N288.1-14, Table C.1 footnotes for details on dose conversion factors and how they account for skin absorption.

Dose due to consumption of well water

The tritium uptake due to consumption of well water is calculated by taking the average tritium concentration of the water sampled.

Using the following annual consumption rates (at the 95th percentile) derived from information found in CSA Guideline N288.1-14[19]:

TABLE 30: CSA GUIDELINE N288.1-14 WATER CONSUMPTION RATES

AGE GROUP	WELL WATER CONSUMPTION RATE (L/a)
INFANT	305.7
CHILD	482.1
ADULT	1,081.1

In 2022, the highest average concentration in a residential well used as the sole source of the drinking water was found in RW-3 at 183 Mud Lake Road, equal to **34.5 Bq/L**. This value will therefore be used in the calculation of the public dose.

P_{29}: Adult dose due to consumption of well water

P_{29} = $[H\text{-}3]_{well}$ x M x 2.0E-05 µSv/Bq;
= [34.5 Bq/L] x 1,081.1 L/a x 2.0E-05 µSv/Bq
= 0.746 µSv/a

P_{29}: Infant dose due to consumption of well water

P_{29} = $[H\text{-}3]_{well}$ x M x 5.3E-05 µSv/Bq;
= [34.5 Bq/L] x 305.7 L/a x 5.3E-05 µSv/Bq
= 0.559 µSv/a

P_{29}: Child dose due to consumption of well water

P_{29} = $[H\text{-}3]_{well}$ x M x 2.5E-05 µSv/Bq;
= [34.5 Bq/L] x 482.1 L/a x 2.5E-05 µSv/Bq
= 0.416 µSv/a

Dose due to consumption of produce

The tritium uptake due to consumption of produce, both locally purchased and home grown is calculated by taking the average tritium concentration of produce purchased from the local market and assuming the consumption of 70% of the annual total of produce from this source, and by taking the average tritium concentration from local gardens and assuming the consumption of 30% of the annual total of produce from this source.

These fractions are based upon the site-specific survey previously conducted by SRBT, which determined that the home-grown fraction of plant products consumed by residents in the surrounding area was approximately 30% - a slightly higher value than that recommended in the generic guidance of N288.1-14 (20-25%).

Using the following annual consumption rates for produce derived using information found in CSA Guideline N288.1-14[20]:

TABLE 31: CSA GUIDELINE N288.1-14 PRODUCE CONSUMPTION RATES

AGE GROUP	FRUIT CONSUMPTION RATE (Kg/a)	ABOVE-GROUND VEGETABLES CONSUMPTION RATE (Kg/a)	ROOT VEGETABLES CONSUMPTION RATE (Kg/a)	TOTAL CONSUMPTION RATE (Kg/a)
INFANT	76.6	36.1	12.1	124.8
CHILD	124.4	97.6	43.2	265.2
ADULT	149.2	192.3	71.8	413.3

The average tritium concentration in produce purchased from the sampled market in 2022 was **3.0 Bq/kg**, while the highest average concentration in produce from a local garden was **71.5 Bq/kg** at 408 Boundary Road.

P_{49}: Adult dose due to consumption of produce (HTO)

P_{49HTO} = $[[H_{prod,market}] + [H_{prod,res}]]$ x 2.0E-05 µSv/Bq
= $[[H\text{-}3_{veg}]$ (Bq/kg) x (kg) x 0.7] + $[H\text{-}3_{veg}]$ (Bq/kg) x (kg) x 0.3]] x 2.0E-5 µSv/Bq
= [[3.0 Bq/kg x 413.3 kg/a x 0.7] + [71.5 Bq/kg x 413.3 kg/a x 0.3]] x 2.0E-05 µSv/Bq
= 0.195 µSv/a

P_{49}: Infant dose due to consumption of produce (HTO)

P_{49HTO} = [[$H_{prod,market}$] + [$H_{prod,res}$]] x 5.3E-05 µSv/Bq
= [[H-3_{veg}] (Bq/kg) x (kg) x 0.7] + [H-3_{veg}] (Bq/kg) x (kg) x 0.3]] x 5.3E-5 µSv/Bq
= [[3.0 Bq/kg x 124.8 kg/a x 0.7] + [71.5 Bq/kg x 124.8 kg/a x 0.3]] x 5.3E-05 µSv/Bq
= 0.156 µSv/a

P_{49}: Child dose due to consumption of produce (HTO)

P_{49HTO} = [[$H_{prod,market}$] + [$H_{prod,res}$]] x 2.5E-05 µSv/Bq
= [[H-3_{veg}] (Bq/kg) x (kg) x 0.7] + [H-3_{veg}] (Bq/kg) x (kg) x 0.3]] x 2.5E-5 µSv/Bq
= [[3.0 Bq/kg x 265.2 kg/a x 0.7] + [71.5 Bq/kg x 265.2 kg/a x 0.3]] x 2.5E-05 µSv/Bq
= 0.156 µSv/a

SRBT directly monitored OBT concentrations in tomatoes and apples in residential gardens, as well as from tomatoes from the commercial market garden. The OBT concentration from the residential produce was measured as 6.5 Bq/kg, while for the commercial produce a value of 2.0 Bq/kg was measured.

P_{49}: Adult dose due to consumption of produce (OBT)

P_{49OBT} = [[$H_{prod,market}$] + [$H_{prod,res}$]] x 4.6E-05 µSv/Bq
= [[H-3_{veg}] (Bq/kg) x (kg) x 0.7] + [H-3_{veg}] (Bq/kg) x (kg) x 0.3]] x 4.6E-5 µSv/Bq
= [[2 Bq/kg x 413.3 kg/a x 0.7] + [6.5 Bq/kg x 413.3 kg/a x 0.3]] x 4.6E-05 µSv/Bq
= 0.064 µSv/a

P_{49}: Infant dose due to consumption of produce (OBT)

P_{49OBT} = [[$H_{prod,market}$] + [$H_{prod,res}$]] x 1.3E-4 µSv/Bq
= [[H-3_{veg}] (Bq/kg) x (kg) x 0.7] + [H-3_{veg}] (Bq/kg) x (kg) x 0.3]] x 1.3E-4 µSv/Bq
= [[2 Bq/kg x 124.8 kg/a x 0.7] + [6.5 Bq/kg x 124.8 kg/a x 0.3]] x 1.3E-4 µSv/Bq
= 0.054 µSv/a

P_{49}: Child dose due to consumption of produce (OBT)

P_{49OBT} = [[$H_{prod,market}$] + [$H_{prod,res}$]] x 6.3E-5 µSv/Bq
= [[H-3_{veg}] (Bq/kg) x (kg) x 0.7] + [H-3_{veg}] (Bq/kg) x (kg) x 0.3]] x 6.3E-5 µSv/Bq
= [[2 Bq/kg x 265.2 kg/a x 0.7] + [6.5 Bq/kg x 265.2 kg/a x 0.3]] x 6.3E-5 µSv/Bq
= 0.056 µSv/a

Total dose due to consumption of produce:

P_{49}: Adult dose due to consumption of produce (HTO + OBT)

P_{49} = P_{49HTO} + P_{49OBT}
= 0.195 µSv/a + 0.064 µSv/a
= 0.259 µSv/a

P_{49}: Infant dose due to consumption of produce (HTO + OBT)

P_{49} = P_{49HTO} + P_{49OBT}
= 0.156 µSv/a + 0.054 µSv/a
= 0.210 µSv/a

P_{49}: Child dose due to consumption of produce (HTO + OBT)

P_{49} = P_{49HTO} + P_{49OBT}
= 0.156 µSv/a + 0.056 µSv/a
= 0.212 µSv/a

Dose due to consumption of local milk

The tritium uptake due to consumption of milk, from a local producer and distributor is calculated by taking the average tritium concentration of the milk sampled. Using the following annual milk consumption rates derived using information found in CSA Guideline N288.1-14[21]:

TABLE 32: CSA GUIDELINE N288.1-14 MILK CONSUMPTION RATES

AGE GROUP	MILK CONSUMPTION RATE (kg/a)
INFANT	340.0
CHILD	319.6
ADULT	188.5

The average concentration in milk in 2022 was measured as 4.00 Bq/L; adjusting for the density of milk, a specific activity of 4.00 Bq/L x 0.97 L/kg = **3.880 Bq/kg** is calculated.

P_{59}: Adult dose due to consumption of milk

P_{59} = $[H\text{-}3]_{dairy}$ x M x 2.0E-05 µSv/Bq;
= [3.880 Bq/kg] x 188.5 kg/a x 2.0E-05 µSv/Bq
= 0.015 µSv/a

P_{59}: Infant dose due to consumption of milk

P_{59} = $[H\text{-}3]_{dairy}$ x M x 5.3E-05 µSv/Bq;
= [3.880 Bq/kg] x 340.0 kg/a x 5.3E-05 µSv/Bq
= 0.070 µSv/a

P_{59}: Child dose due to consumption of milk

P_{59} = $[H\text{-}3]_{dairy}$ x M x 5.3E-05 µSv/Bq;
= [3.880 Bq/kg] x 319.6 kg/a x 2.5E-05 µSv/Bq
= 0.031 µSv/a

Representative persons annual dose due to tritium uptake based on EMP

Based on the EMP results and the coefficients and parameters taken or derived from N288.1-14[17-21], the annual dose (P_{total}) due to tritium uptake from inhalation and skin absorption, consumption of local produce, local milk and well water equates to a conservatively-calculated maximum of **2.002 µSv** in 2022.

TABLE 33: 2022 REPRESENTATIVE PERSONS ANNUAL DOSE BASED ON EMP

DOSE CONTRIBUTOR		ADULT WORKER ANNUAL DOSE (µSv/A)	ADULT RESIDENT ANNUAL DOSE (µSv/A)	INFANT RESIDENT ANNUAL DOSE (µSv/A)	CHILD RESIDENT ANNUAL DOSE (µSv/A)
DOSE DUE TO INHALATION and ABSORPTION AT WORK	$P_{(I)19}$	0.638			
DOSE DUE TO INHALATION and ABSORPTION AT RESIDENCE	$P_{(I)19}$	0.344	0.837	0.728	0.990
DOSE DUE TO CONSUMPTION OF WELL WATER	P_{29}	0.746	0.746	0.559	0.416
DOSE DUE TO CONSUMPTION OF PRODUCE	P_{49}	0.259	0.259	0.210	0.212
DOSE DUE TO CONSUMPTION OF MILK	P_{59}	0.015	0.015	0.070	0.031
2022 PUBLIC DOSE	P_{TOTAL}	**2.002**	1.857	1.567	1.649

Statement of Uncertainties in Calculation of Public Dose:

All parameters taken from N288.1-14 are at the 95th percentile where available, which is a very conservative assumption. Actual ingestion and inhalation rates are likely to be lower for most of the population. Actual doses to persons are likely to be significantly lower than calculated doses presented here as a result.

Statement of Compliance with Regulatory Limit:

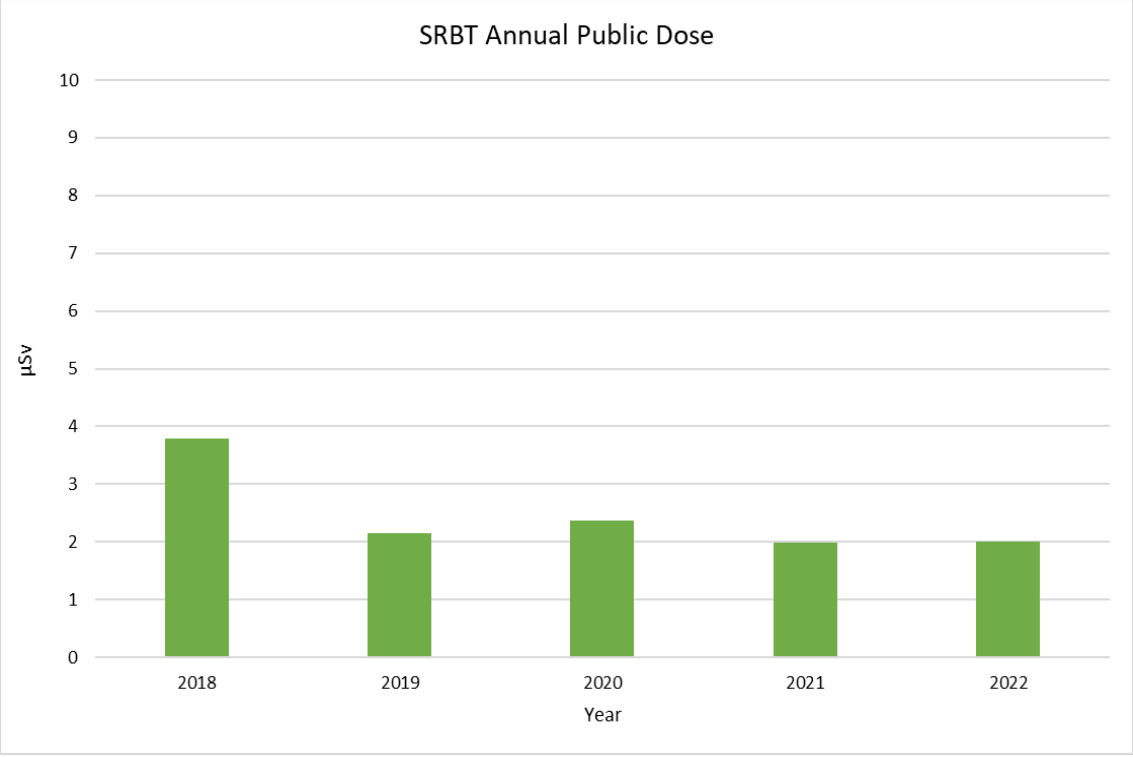
Based upon the analysis of the data from both the environmental and effluent monitoring programs, the maximum effective dose imparted in 2022 by SRBT, to persons who are not categorized as Nuclear Energy Workers (conservatively calculated as 0.002 mSv), falls well below the prescribed limit of 1 mSv. SRBT complies with this regulatory requirement.

Public Dose Trends

The calculated effective dose of **2.002 µSv** to the most-exposed representative person is comparable with the calculated effective doses over the past five years.

The five-year trend for the effective dose to members of the public is illustrated below in Figure 18, with the data compared on an axis with a maximum value of 10 µSv.

FIGURE 18: PUBLIC DOSE FIVE-YEAR TREND (2018-2022)



4.3.6 Program Effectiveness

The suite of SRBT environmental protection programs have continued to be effective in measuring tritium in the environment and at ensuring the prevention of unreasonable risk to the environment.

The Environmental Monitoring Program continues to be implemented effectively. The past year represents the fifth full year of operation since the program revision to comply with the requirements of CSA standard N288.4-10, and the program continues to be improved over time.

Our passive air sampling array is effective and provides a picture of the full extent of tritium concentrations in air resulting from the emissions from the facility, and in turn providing real data to accurately estimate the dose to representative persons resulting from the emissions from the facility.

Tritium concentrations in residential wells, and in milk and produce that are consumed by residents living near the facility are measured. This data is effective at providing the full extent of tritium concentrations in human food and potable water sources resulting from the emissions from the facility, and in turn providing data to reliably estimate the dose to representative persons resulting from the emissions from the facility.

The Effluent Monitoring Program was also implemented very effectively in 2022, and succeeded in achieving the defined objectives of the program, including confirming the adequacy of controls on releases from the source, providing high-quality data, and demonstrating adherence to licence limits.

The Groundwater Monitoring Program was highly effective at providing data on the full extent of tritium concentrations in groundwater resulting from the emissions from the facility, and demonstrating the effectiveness of operational changes that have taken place over the last several years.

4.3.7 Program Review and Audit Summary

All major elements of the Environmental Management System (EMS) are scheduled to be audited at least once every three years.

As part of this cycle, the Groundwater Monitoring Program was internally audited in December, with no non-conformances being identified, and two OFIs being recommended. Both OFIs are administrative in nature and shall be implemented in 2023.

All programs under the EMS were subject to a full review, including comprehensive self-assessment and benchmarking, in the first quarter of 2022. The results of these review exercises were included as input into the annual facility management review process, as per SRBT procedure MSP-008, *Management Review*.

4.3.8 Proposed Modifications to EMS Programs

There are no proposed significant major changes to the monitoring programs that comprise SRBT's EMS, including the EMP, EffMP and GMP.

4.4 SCA – Emergency Management and Fire Protection

As most potential hazards associated with the facility would result from fire, emergency management and response for the facility are addressed by an extensive Fire Protection Program supported by an Emergency Plan.

4.4.1 Fire Protection

Various measures were taken at the facility in 2022 to improve and maintain fire safety. These activities included but were not limited to the following:

- A qualified third-party contractor completed a Site Condition Inspection at the facility, and issued a detailed report.
- Fire safety training for all SRBT employees was conducted in December during the annual all-staff safety training sessions.
- The PFD completed an inspection of the SRBT facility, and
- Continued enhanced training for one Fire Protection committee member.

4.4.1.1 Fire Protection Committee

In 2022, three formal Fire Protection Committee meetings were held which resulted in the implementation of several improvements for fire protection and life safety at the facility. All Fire Protection Committee meeting minutes are kept on file.

4.4.1.2 Fire Protection Program, Fire Safety Plan and Procedures

The SRBT Fire Protection Program (Rev. F) and Fire Safety Plan (Rev. E) documents were not changed in 2022. One procedure was revised (FPP-011) in 2022.

A new stand-alone procedural document (FPP-019) was implemented in November 2022, which describes the requirements for inspection of fire dampers throughout the facility. These requirements were previously described in a different management system procedure, alongside other non-Fire Protection Program requirements; as such, that procedure was made obsolete, and the requirements were separated into procedures within their appropriate program areas.

4.4.1.3 Fire Hazards Assessment

SRBT maintains a Fire Hazards Assessment (FHA), in accordance with CSA standard N393-13, *Fire protection for facilities that process, handle, or store nuclear substances*.

The FHA was last completed in 2020, where it was assessed that fire hazards at the SRBT facility are being controlled, that worst-case fire events would not be expected to result in an unacceptable release of radiological or hazardous materials, and that there are adequate fire protection and life-safety features. The FHA concluded that the performance goals, objectives and criteria of CSA N393-13 have been satisfied at the SRBT facility.

The FHA is reviewed and revised on a five-year cycle; it is next due for review in 2025.

4.4.1.4 Independent Audit of the Fire Protection Program

An independent audit of the FPP is required every three years, as per CSA standard N393-13, *Fire protection for facilities that process, handle, or store nuclear substances*.

This audit was last conducted in 2021, and is next due for completion in 2024.

4.4.1.5 Maintenance of the Sprinkler System

In 2022, quarterly and annual maintenance was performed on the sprinkler system by a third party. In addition, a weekly check of various valves and line pressures were performed by trained SRBT staff.

4.4.1.6 Fire Protection Equipment Inspections

In 2022, in-house routine inspection, testing and maintenance was performed on all fire protection and life safety equipment at the SRBT facility on a daily, weekly, monthly and annual basis by trained staff.

Qualified third-party contractors also performed routine inspection, testing and maintenance of fire protection and life safety equipment at the SRBT facility. Annual inspection, testing and maintenance include fire extinguishers, emergency lighting, the fire panel and sprinkler system.

4.4.1.7 Fire Extinguisher Training

Fire extinguisher training is typically conducted annually for all SRBT employees. The PFD provided this training in November 2022.

4.4.1.8 Fire Protection Committee Member Training

The Fire Protection Committee continues to include a member who volunteers as a firefighter for a local fire department, and receives fire protection training from this department.

4.4.1.9 Fire Alarm Drills

A total of six in-house fire alarm drills were conducted in 2022.

Following each fire drill, a member of the Fire Protection Committee visits each department to discuss the drill. If any employee has comments or concerns regarding the drill they are provided with a Fire Alarm Drill Report to complete. Each report was reviewed by the Fire Protection Committee, and actions were taken as required to enhance fire and life safety at the facility.

4.4.1.10 Fire Protection Consultant Inspection

In October, a qualified third party (PLC Fire Safety Solutions) was contracted to complete a Site Condition Inspection, in order to meet the requirements of CSA standard N393-13, *Fire protection for facilities that process, handle, or store nuclear substances*.

The scope of the inspection was to evaluate the SRBT facility for compliance with the applicable inspection, testing and maintenance requirements of our operating licence. The following codes and standards were reviewed for applicability to the specific systems at SRBT:

- NFCC-2015, *National Fire Code of Canada*
- NBCC-2015, *National Building Code of Canada*
- CSA standard N393-13, *Fire protection for facilities that process, handle, or store nuclear substances*.

Following the inspection, PLC prepared and issued a Site Condition Inspection Report, where one finding and one opportunity for improvement was identified. The finding has been fully addressed and closed.

4.4.1.11 Pembroke Fire Department Inspection

The PFD conducted a facility inspection to confirm compliance with the Ontario Fire Code in October, with no violations being identified.

4.4.2 Emergency Preparedness

SRBT ensures that we are prepared for an emergency at our facility. Staff, equipment and infrastructure are in place and ready to respond to an emergency in accordance with documented procedures.

4.4.2.1 Emergency Plan

The SRBT Emergency Plan has been developed based on the probability and potential severity of emergency scenarios associated with the operation of the facility.

The plan includes preparing for, responding to, and recovering from the effects of accidental radiological and/or hazardous substance releases from the SRBT facility.

The plan was last revised in 2017, and remains up-to-date for the facility's current state. A revision to the plan is scheduled to be completed in calendar year 2023, incorporating the lessons learned from the most recent full-scale emergency exercise in 2021.

4.4.2.2 Emergency Exercises

SRBT did not conduct an emergency exercise in 2022. A full-scale emergency exercise was last conducted on October 26, 2021.

Section 7.10.1.1 of the SRBT Emergency Plan requires that an emergency exercise be conducted at least once every five years. The next full-scale emergency exercise at SRBT is expected to be conducted on or before October 26, 2026, pursuant to the requirements of the Emergency Plan and our operating licence.

4.5 SCA – Waste Management

SRBT implements a Waste Management Program (WMP) that is aligned with the applicable requirements and guidelines in the following CSA Standards:

- CNSC REGDOC-2.11.1*, Waste Management, Volume I: Management of Radioactive Waste*
- CSA N292.0:19*, General principles for the management of radioactive waste and irradiated fuel*
- CSA N292.3-14*, Management of low- and intermediate-level radioactive waste*
- CSA N292.5-11 (R2016), *Guideline for the exemption or clearance from regulatory control of materials that contain, or potentially contain, nuclear substances*
- CSA N292.8:21*, Characterization of radioactive waste and irradiated fuel*

4.5.1 Radioactive Consignments – Waste

Nine shipments of low-level waste (LLW) were made to Canadian Nuclear Laboratories (CNL) in 2022.

A total of 135 packages of expired gaseous tritium light sources, 1 package of expired tritium trap bases, 5 drums of surface-contaminated materials, and 26 packages of crushed stub glass were generated and safely transferred to CNL for further management in 2022.

Four drums of waste liquid scintillation counting vials were also generated and transferred in two shipments to EnergySolutions for further management in 2022.

A total volume of 4.71 m^3 of LLW in 171 packages was generated and shipped to waste management service providers in 2022.

According to the report titled *Inventory of Radioactive Waste in Canada 2019*[22] published by Natural Resources Canada, the volume of waste generated at SRBT is extremely small compared to other Class 1 nuclear facilities. The report notes that in 2019, a total of 8,951 m^3 of LLW was generated in Canada. SRBT's waste footprint in 2022 represents 0.05% of this value. As such, SRBT's contribution to the total generated LLW in Canada is relatively small.

The following table is provided as a summary of the low-level waste material that was generated and routed to licenced waste management facilities for further management in 2022.

TABLE 34: RADIOACTIVE WASTE CONSIGNMENTS (2022)

	Date of Shipment	Waste Description	Number of Packages	Waste Description	Total Weight (Kgs)	Total Activity H-3 (TBq)
CNL	Jan. 18, 2022	LLW	22	Expired light sources	88	272.320
			2	Crushed stub glass	42	0.018
			0	Drums of LLW	0	0.000
	Feb. 22, 2022	LLW	10	Expired light sources	40	112.810
			2	Crushed stub glass	41	0.018
			0	Drums of LLW	0	0.000
	Mar. 22, 2022	LLW	1	Tritium trap bases	6	14.500
			17	Expired light sources	68	197.170
			1	Crushed stub glass	21	0.009
			1	Drums of LLW	70	0.010
	Apr. 19, 2022	LLW	11	Expired light sources	44	215.520
			2	Crushed stub glass	42	0.018
			1	Drums of LLW	70	0.010
	May 24, 2022	LLW	11	Expired light sources	44	185.530
			2	Crushed stub glass	42	0.018
			0	Drums of LLW	0	0.000
	Aug. 23, 2022	LLW	0	Expired light sources	0	0.000
			8	Crushed stub glass	168	0.072
			1	Drums of LLW	70	0.010
	Oct. 31, 2022	LLW	15	Expired light sources	60	169.170
			5	Crushed stub glass	105	0.045
			1	Drums of LLW	70	0.010
	Nov. 15, 2022	LLW	26	Expired light sources	104	555.450
			1	Crushed stub glass	21	0.009
			0	Drums of LLW	0	0.000
	Dec. 20, 2022	LLW	23	Expired light sources	92	460.460
			3	Crushed stub glass	63	0.027
			1	Drums of LLW	70	0.010
Energy Solutions	May 4, 2022	LLW	2	Drums of LLW	209	0.010
	Nov. 3, 2022	LLW	2	Drums of LLW	209	0.010
				TOTALS	**1,859.00**	**2,183.23**

4.5.2 Management of Radioactive Waste

Radioactive waste was generated and managed on-site, and inventory records of the waste were maintained throughout the year, as per the WMP.

4.5.2.1 Low-level Waste Interim Storage

Low-level waste is any waste assessed as possessing activity levels that exceeds conditional clearance limits (for tritium), or in excess of the exemption quantities established in the *Nuclear Substances and Radiation Devices Regulations* (for all other radionuclides). Typical examples of such wastes are tritium-contaminated equipment or components, crushed glass, contaminated filters, broken lights, and material used to decontaminate surfaces.

As required by the WMP, LLW was collected in dedicated receptacles, assessed and ultimately placed into approved containers in the Waste Storage Room within Zone 3. Once sufficient material was collected, it was prepared for transfer to a licensed waste handling facility (CNL), using approved processes.

TABLE 35: INTERIM STORAGE OF LOW-LEVEL WASTE (ZONE 3)

AMOUNT IN STORAGE AT YEAR END 2021	AMOUNT GENERATED THROUGHOUT 2022	TRANSFERRED OFF SITE 2022	AMOUNT IN STORAGE AT YEAR END 2022
1 x 200 L drum	5 x 200 L drums	5 x 200 L drums	1 x 200 L drum
0.01 TBq	0.05 TBq	0.05 TBq	0.01 TBq

As well, four drums of liquid scintillation counting vials were managed and stored in 2022, four of which were transferred to EnergySolutions for further management. One drum remained in interim storage for disposal once filled in early 2023.

4.5.2.2 Clearance-level Waste

Waste materials in Zone 2 and 3 that may be minimally contaminated and are likely to meet accepted clearance criteria are classified as very low-level waste (VLLW). This classification is temporary, as ultimately VLLW is assessed radiologically, and routed through one of three accepted disposal pathways – either as LLW or as clearance-level waste (CLW).

Examples of such materials include paper towels, gloves, disposable lab coats, shoe covers, and other such materials that are collected in dedicated receptacles in the active areas of the facility. These materials are routed to landfill after they have been conditionally cleared.

As well, any metal that can be recycled once conditionally cleared is routed to a local metal recycling depot.

Finally, any cleared items that also have hazardous characteristics are routed via a local hazardous waste depot under an industrial, commercial and institutional small quantity waste generator agreement. Some examples of such materials are batteries, aerosol containers, fluorescent light tubes, paints and solvents, and empty propane cylinders

A total of 69 clearance assessment reports were completed in 2022, representing a total mass of approximately 1,505,000 grams of material, and a total activity of approximately 11,920 MBq.

The approved WMP clearance criteria is set at 0.15 MBq/g, up to a maximum of 5,000 kg of cleared material per pathway. All cleared waste met these conditions in 2022, with an average specific activity of 0.009 MBq/gram.

The mass and activity of CLW generated in 2022 is tabulated below.

TABLE 36: CLEARANCE-LEVEL WASTE (2022)

TYPE OF MATERIAL	PATHWAY	MASS (g)	ACTIVITY (MBq)	MBq/g
GENERAL WASTE	LANDFILL	1,431,000	11,910	0.008
METAL	RECYCLER	11,000	10	0.001
HAZARDOUS WASTE	HAZARDOUS WASTE DEPOT	63,000	0	0
	TOTAL	**1,505,000**	**11,920**	**0.008**

4.5.2.3 Subject Waste

SRBT routinely manages and ships two types of non-radiological ‘subject’ waste at the facility.

Phosphorescent (zinc sulfide) powder (classified as mild environmental contaminant) is collected and shipped to a licenced hazardous waste management contractor. In addition, waste liquids from the 3-D printing process are also collected and shipped when they are generated.

This waste is picked up quarterly, and managed by a qualified service provider in accordance with the requirements of the Ontario Ministry of Environment and Climate Change.

In 2022, 317 kg of zinc sulfide powder was safely disposed of through this program. No 3-D printing process waste was generated or shipped in 2022.

4.5.2.4 Waste Minimization

SRBT continues to minimize the generation of radioactive waste materials as part of our overall approach to waste management.

The Waste Management Committee met twice in 2022 to review and discuss initiatives that could ultimately minimize the amount of radioactive waste routed to licenced waste management facilities. As well, initiatives for the reduction of conventional waste materials and energy usage were also discussed.

Continued segregation of material prior to bringing items into active zones remains effective at reducing waste materials that require management.

The implementation of Conditional Clearance Levels for waste materials has continued to be successful in reducing the amount of waste material that is needlessly disposed of as radioactive waste.

4.5.2.5 Expired Product Management

SRBT continues to offer return and disposal services to customers who possess expired tritium-illuminated devices, such as ‘EXIT’ signs.

In 2022, a total of 15,492 expired (or otherwise removed from service) self-luminous safety ‘EXIT’ type signs were accepted by SRBT from Canadian and American sources, representing a total activity of 2,116.61 TBq of tritium.

For comparison, in 2021, 24,510 signs were processed representing 3,767.75 TBq of tritium.

As well, an additional 212.16 TBq of tritium was accepted from international origins (i.e. other than Canada and the United States) in the form of expired tritium illuminated devices, such as aircraft signs, dials, gauges and other smaller equipment. These were also processed for shipment to a licenced waste management facility.

Expired signs are disassembled safely and the light sources removed, in order to ensure that the volume of low-level radioactive waste that is generated is minimized.

The expired lights are then packaged and shipped to a licenced radioactive waste management service provider.

A small number of these signs were evaluated as being fit for service in other applications, or having light sources that could be reused in other self-luminous devices.

This practice is the only re-use of the lights and the tritium associated with these lights, and would represent a very small fraction of the total light sources managed.

4.6 SCA – Security

SRBT implements an accepted Facility Security Program for the facility, in accordance with CNSC regulatory requirements and expectations.

SRBT did not experience any security-related events in 2022.

In October, CNSC staff conducted a compliance inspection focused on the Safety and Control Area of Security. The inspection was conducted on-site over the course of one day.

Although specific details on Security inspection results are protected, it can be stated that no major issues were identified as a result of this inspection, and that the program was found to meet CNSC staff expectations.

New staff members are required to qualify for a Facility Access Security Clearance (FASC), even if they are not expected to handle nuclear substances as part of their responsibilities. Individuals and contractors that visit the facility are required to also have an FASC or be escorted at all times by a staff member with a valid FASC.

All staff receive both initial and annual refresher training in SRBT's Supervisory Awareness Program, for the purposes of ensuring compliance with section 48 of the *Nuclear Security Regulations.*

Maintenance of the physical facility security system is performed by a qualified, independent third party at least every 6 months.

4.7 SCA – Safeguards and Non-proliferation

SRBT possesses, uses, stores and manages a small quantity of depleted uranium under IAEA exemption approval EU\01\CN-2\D\ZZ00211.

This material is used as storage media for tritium gas on our processing equipment, a well-understood and widely-used strategy for manipulating and storing tritium in its gaseous, elemental state. By using depleted uranium in this fashion, we can ensure that the quantity of gaseous tritium being used during any given processing operation is restricted. This helps to ensure that the consequences of any unplanned event are minimized with respect to radiation and environmental protection, by ensuring that any release of tritium is limited.

SRBT possessed a reported 9.597 kg of depleted uranium in metallic form at the beginning of 2022. The inventory of material changed once in 2022 with the shipment of one package of expired tritium trap bases to CNL. Inventory change documents were filed with CNL and CNSC in order to process this transfer of materials.

As a result of this shipment, the total inventory of depleted uranium at SRBT now stands at 8.721 kg at the conclusion of 2022. A limit of 10 kg of this material in inventory is applied as part of the operating limits and conditions in the SAR.

4.8 SCA – Packaging and Transport of Nuclear Substances

SRBT prepared, packaged and shipped all manufactured products containing nuclear substances in accordance with the *Packaging and Transport of Nuclear Substances Regulations.*

For the purpose of packaging and offering for transport, shipments of product designated as dangerous goods, SRBT must comply with the requirements of:

- CNSC
- International Atomic Energy Agency (IAEA)
- International Air Transport Association (IATA)
- Transport Canada

The procedures used at SRBT are based on regulations and practices found in the following publications:

- *Packaging and Transport of Nuclear Substances Regulations*
- IAEA Safety Standards Series - No. SSR-6
- IATA Dangerous Goods Regulations
- The TDG Compliance Manual: Clear Language Edition (Carswell)

Staff members involved with the packaging, offering for transport and receipt of dangerous goods are given TDG training in accordance with the applicable regulations and are issued certificates by the employer.

4.8.1 Outgoing Shipments

In total, 761 consignments were safely shipped to various customers located in 21 countries around the world, including Canada. A table is provided comparing the number of outgoing shipments of our products over the past five years.

TABLE 37: OUTGOING SHIPMENTS OF PRODUCT FIVE-YEAR TREND (2018-2022)

YEAR	2018	2019	2020	2021	2022
NUMBER OF SHIPMENTS*	948	949	827	811	761
NUMBER OF COUNTRIES	22	20	19	28	21

*Note – SRBT often ships single palletized shipments of safety signs to the US which subsequently get broken down into multiple sub-consignments. These types of shipments are counted as a single consignment for the purposes of this table.

All outgoing shipments were conducted in compliance with all regulatory requirements pertaining to the transport of dangerous goods and / or nuclear substances. Packages were assessed for surface contamination prior to being offered for transport as required by SRBT procedures.

Information pertaining to the number of monthly outgoing shipments containing radioactive material for 2022 can be found in **Appendix S** of this report.

4.8.2 Incoming Shipments

In total, 161 consignments of radioactive shipments were received from various customers located in 9 countries around the world, including Canada. These returns held a total activity of 2,329 TBq of tritium.

The vast majority of the returned, expired devices were in the form of expired ‘EXIT’ signs that are to have the expired lights removed and sent for future management at a licenced waste management facility.

A table is provided comparing the amount of incoming shipments of radioactive products that have been made over the past five years.

TABLE 38: INCOMING SHIPMENTS OF PRODUCT FIVE-YEAR TREND (2018-2022)

YEAR	2018	2019	2020	2021	2022
NUMBER OF SHIPMENTS	518	484	272	165	161
NUMBER OF COUNTRIES	7	8	8	10	9

All incoming shipments were received safely and in acceptable condition. Incoming packages containing nuclear substances are assessed for tritium leakage upon receipt.

Information pertaining to the number of monthly received shipments containing radioactive material for 2022 can be found in **Appendix T** of this report.

4.8.3 Reportable Events

No packaging and transport-related reportable events or dangerous occurrences occurred in 2022.

5. Other Matters of Regulatory Interest

5.1 Public Information and Disclosure

This section of the report will provide public information initiatives taken in 2022.

5.1.1 Direct Interaction with the Public

Historically, almost all public inquiries occur during re-licensing. In 2022 there were no public local or non-local inquiries made that were **NOT** related to re-licensing.

In 2022, water was sampled from a number of wells belonging to the public, in line with our Environmental Monitoring Program. Sampling for tritium concentrations were performed twice in 2022, March and September.

Participating members of the public are provided with a report of their sample results, along 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. No questions or comments were received in 2022.

Plant tours have proven to be a useful tool for SRBT to reach the public. In 2022, we have provided plant tours to 7 members of the general public (compared to 4 in 2021 and 10 in 2020) who had expressed interest in our facility. Ongoing COVID-19 controls have continued to restrict non-essential visitors, which contributed to the much lower number of plant tours since 2020.

In 2022 we provided plant tours to local representatives of:

- Renfrew County Community Futures Development Corporation,
- The City of Pembroke, and
- Pembroke Fire Department,

In 2022 as part of conducting our business in Pembroke we have also provided plant tours to local employee representatives of our existing and prospective suppliers of goods and/or services, including:

- EIP
- BSI

In 2022, due to the ongoing COVID-19 restrictions, we did not provide any plant tours to existing and prospective customers.

TABLE 39: FACILITY TOURS (2022)

	2022
GENERAL PUBLIC	7
LOCAL INSTITUTIONS	3
LOCAL SUPPLIERS	2
CUSTOMERS	0
TOTAL	**12**

A public meeting was held by the CNSC on December 16, 2022 regarding the annual regulatory oversight report. Two questions were asked to each licensee to answer: what are their thoughts on their performance ranking by the AOPFN and do you perform public opinion polls. Questions were answered to the satisfaction of the Commission during the meeting.

In 2022, SRBT made presentations to members of the public:

- The President of SRBT is a member of the Pembroke Economic Development Tourism Advisory Committee, attending monthly meetings where updates on SRBT are often discussed. The Mayor of Pembroke and one Pembroke City Councillor are also members of this committee.
- The President of SRBT is also a member and chair of the Community Improvement Plan, attending meetings and discussing SRBT on occasion. The Mayor of Pembroke is also on the Committee.
- The President of SRBT is also a member of the Ontario River Energy Solutions, attending meetings and discussing SRBT on occasion. Pembroke's Deputy Mayor is also a member of this committee.
- The Manager – Health Physics and Regulatory Affairs made a presentation to the Applied Nuclear Sciences and Radiation Safety program at Algonquin College to discuss SRBT's Environmental Protection and Monitoring programs.

As part of SRBT's licence renewal application several public information initiatives have taken place:

- On January 14, 2022 SRBT received CNSC staff's Commission Member Document (CMD), and SRBT submitted their CMD to CNSC staff. Both documents were added to SRBT's website.
- On January 22, 2022 both SRBT and CNSC staff's CMD's were e-mailed to:
    - Local members of Federal and Provincial Parliament
    - Indigenous Groups (Algonquins of Ontario, Metis Nation of Ontario, Algonquins of Anishinabeg Nation, Algonquins of Pikwakanagan First Nations and Kebaowek First Nation), and
    - City of Pembroke Officials
- On March 21, 2022 the Public Hearing agenda was added to SRBT's website.
- On April 1, 2022 SRBT's yearly pamphlet was hand-delivered to 215 households/businesses within a 2 km radius of the SRBT facility.
- Since late 2021 ongoing conversations were had with Mr. David Winfield, who is one of the individuals who was a recipient of the Participant Funding for SRBT's licence renewal.

  The Manager – Health Physics and Regulatory Affairs had several phone calls in early 2022 with Mr. Winfield as well as provided him a tour of the SRBT facility on March 9, 2022. The following was discussed:

    - On January 21, 2022 an e-mail was sent to this individual providing him copies of SRBT and CNSC staff's CMDs and offering him a tour of the facility. The same day a telephone conversation took place where this individual noted he is currently reviewing both CMD's and SRBT's application and noted a tour of the facility may not be necessary.
    - On February 25, 2022 a telephone conversation took place where this individual posed several questions in regards to his review of SRBT's licence renewal application, annual compliance report, Safety Analysis Report etc. Some topics that were discussed were, waste, proximity of the Superior Propane site, ventilation system

and wine sampling, and he noted the amount of detail in SRBT's annual compliance reports.

  - On February 28, 2022 a telephone conversation took place where this individual posed additional questions and comments relating to alternative types of technology, the use of radionuclides other than tritium, the CNSC Safety and Control area framework, and the fact that SRBT's openness for sharing information in not the norm in his experience.

  - On March 9, 2022 Mr. Winfield was provided a tour of the SRBT facility. He toured all departments, engaged directly with each supervisor and was able to get a sense of the scope and scale of our processing operations. He noted he found the tour very useful and it will be helpful as he finalised his submission to the Commission.

  - On March 10, 2022 an e-mail was sent to this individual providing clarification of an assumption that was made regarding the propane storage tank across the street from the facility is closer to the facility than stated in SRBT's Safety Analysis Report (SAR). The same day a telephone conversation took place where this individual acknowledged he was mistaken of which tank in question was noted in the SAR.

  - On March 24, 2022 a telephone conversation took place where this individual noted he had done extensive research on propane facility accidents over the last couple of years and noted he was not overly concerned with the potential impact on SRBT if such an event were to happen at the Superior Propane facility.

- On April 6, 2022 SRBT's supplemental CMD was posted to our website.
- On May 16, 2022 links to both the video and the transcript from the April 27, 2022 hearing were posted on our website.
- On June 29, 2022 a Press Release announcing the renewal of SRBT's licence for a period of 12 years was posted on our website and to our social media accounts.

5.1.2 Program Revision

Revision A dated September 15, 2021 of SRBT's Public Information Program (PIP) continues to demonstrate SRBT's commitment to openness and transparency.

5.1.3 Program Audit

There was one internal audit conducted on the Public Information Program on November 18, 2022. The audit resulted in no NCR's or OFI's. The audit concluded that activities related to the PIP are satisfactorily being carried out as documented. The next internal audit is scheduled to take place in August 2025.

5.1.4 Public Information Committee

The Public Information Committee held two formal meetings in 2022, focused on outreach to the Algonquins of Pikwakanagan Indigenous community and the long-term relationship agreement (LTRA).

5.1.5 Website and Social Media

SRBT continues to operate a website at www.srbt.com, which continues to provide current environmental monitoring data, information about tritium, content on emergency preparedness, the safe transport of tritium to the facility and products from the facility, how to safely dispose of products, and both our Operating Licence and LCH.

The main page provides a number of possible information sources for the public on tritium and radiation exposure.

The following information and documentation were added to our website in 2022:

- CNSC Compliance Inspection Report 2021-03,
- Updated pamphlet and brochure,
- SRBT Annual Compliance Report, 2021, including addenda,
- Updated environmental and groundwater monitoring results,
- 2021 CNSC Independent Environmental Monitoring Program (IEMP) results,
- CNSC staff's Regulatory Oversight Report, 2021,
- CNSC staff's Commission Member Document (CMD)

- Public Hearing agenda,
- SRBT's CMD and supplementary CMD,
- Press Release announcing the renewal of SRBT's licence for a period of 12 years,
- SRBT's Class IB Nuclear Substance Processing Facility Licence NSPFL-13.00/2034,
- SRBT's Licence Conditions Handbook, and
- Links to the transcript and video of SRBT's public hearing.

With respect to social media, SRBT also maintains Facebook, Instagram, Twitter, LinkedIn, Reddit and TikTok accounts, all of which are updated periodically.

Our Facebook account has a total of 1,160 followers, with a total of 10 posts in 2022. The account has received no reviews and 0 page likes in 2022.

SRBT's Instagram account has a total of 364 followers, with a total of 4 posts in 2022. The account received an average of 33 likes per post in 2022.

SRBT's Twitter account has a total of 86 followers. A total of 8 posts have been made in 2022, receiving 36 likes.

SRBT's LinkedIn account has a total of 68 followers and has posted a total of 1 post in 2022 receiving a total of 55 impressions.

SRBT's Reddit account only has one follower and has posted a total of 17 posts receiving 2000 interactions.

SRBT's TikTok account has 23 followers and has posted a total of 14 posts receiving a total of 92 likes.

5.1.6 Community Support

SRBT continues to support the local community by providing support to various organizations and causes.

During the Christmas season, SRBT once again supported the Christmas Angels gift collection for children in the area, aimed at supporting families who couldn't afford gifts at Christmas.

SRBT is a member of the Upper Ottawa Valley Chamber of Commerce, the Canadian Nuclear Association (CNA) and was a diamond sponsor for a local school fundraiser. The Manager – Health Physics and Regulatory Affairs is a member of the Advisory Committee for the Applied Nuclear Science and Radiation Safety program at Algonquin College.

SRBT also sponsors a local softball team, a local hockey team and the Pembroke Memorial Center (a local hockey rink).

SRBT supports the Pembroke Fire Department Chili Fest which raises money to support local charities, and also donated in support of the Fire Prevention Week. SRBT sponsors three local fishing derbies.

SRBT also supports Festival Hall (Pembroke's local community theater), the Renfrew County Regional Science and Technology Fair, and a local thrift store that supports mental health and the homeless in the area.

SRBT is a member of the Canadian Council for Aboriginal Business (CCAB).

5.1.7 Indigenous Engagement

During the month of January 2022 several email correspondences between the Algonquins of Pikwakanagan (AOPFN) and SRBT took place to finalize a date, time and attendees of a meeting to discuss a long-term relationship agreement (LTRA).

On February 1, 2022 a meeting between the AOPFN and SRBT took place; topics discussed included AOPFN's high-level review of SRBT's ERA, AOPFN's engagement and collaboration plan for SRBT and interest in Cultural Awareness training.

SRBT offered a tour of the facility but due to the ongoing pandemic the AOPFN requested a postponement of tour until a later date.

AOPFN committed to provide a cost of engagement to SRBT listing costs and details as well as a Memorandum of Understanding with what was discussed during this meeting. SRBT reiterated their commitment with working with AOPFN for the long-term future.

Following the meeting, SRBT sent a thank you e-mail to the AOPFN noting it was positive and productive. Several more e-mails during the month of February were sent between SRBT and AOPFN noting the draft LTRA and to set up a second meeting.

On February 23, 2022 the second meeting between the AOPFN and SRBT took place. The AOPFN proposal included fixed annual contributions of $20,000 per year to the Guardian Program as well as annual contributions to the Algonquin Way Cultural Center of $20,000 per year. The proposal also included fees for ongoing engagement support services and fixed fees for Cultural Awareness training for our staff.

SRBT expressed immediate interest in the Cultural Awareness training and requested a quote, possible training days and approximate length of the training.

AOPFN requested that an invoice for ongoing discussions and consultations be paid by SRBT without prior notice; SRBT agreed to pay the invoice in good faith but explained that any activity must be planned, quoted and approved prior to being spent. SRBT requested that in future AOPFN provide fixed quotation in advance for any work, review and/or consultation that is undertaken for SRBT, so that SRBT could provide written approval before conducting such work. SRBT further explained that being in the private sector, SRBT is 100% privately owned by private individuals and not owned, or funded by the government or a large

group of shareholders. All SRBT activities must be carefully planned, budgeted and funded solely by sales.

During the month of May, SRBT and AOPFN had several discussions via e-mail and telephone conversations in order to finalize the delivery of Cultural Awareness Training sessions.

The Cultural Awareness training sessions took place in the community of Pikwakanagan on June 13th, 2022, July 18th, 2022, August 15th, 2022 and September 19th, 2022. **All SRBT employees received the training**. All invoices were paid in a timely manner.

5.2 Preliminary Decommissioning Plan and Financial Guarantee

The SRBT Preliminary Decommissioning Plan (PDP) last underwent a significant revision in 2019, and was accepted by CNSC staff on February 3, 2020[23], while the Commission accepted SRBT's revised Financial Guarantee (FG) amount of $727,327.00 on December 8, 2020[24].

Both the PDP and FG are next due for review, revision and updating in 2024.

Details on our revised PDP, updated FG, and the CNSC's hearing and decision are available on our website.

The SRBT FG is a cash fund held in escrow, and does not rely on any letters of credit, bonds, insurance or other expressed commitments.

Interest accrued on the funds deposited remain held in escrow over time; as a result, at the end of 2022 the FG is over-funded to $760,088.03, a level that exceeds the required amount by $32,761.03.

6. Improvement Plans and Forecast

6.1 Emission Reduction Initiatives

SRBT continues to explore ways toward reducing tritium emissions from the facility in all forms, as per our continuing commitment to environmental protection and the ‘as low as reasonably achievable’ philosophy.

We expect that the changes introduced to the manufacturing and leak testing of miniature light sources should continue to keep the rate of generation of tritium-contaminated liquid effluent very low in 2022.

Continued, systematically developed training of employees who process tritium and handle light sources will continue to impact our gaseous and liquid emissions in a positive way.

6.2 Safety Performance Targets for 2023

For the coming year, our safety committees, in consultation with SRBT Senior Management, have approved a set of performance targets which will be tracked and reported on as part of the 2023 ACR.

The following table documents the safety performance targets for SRBT in 2023:

TABLE 40: SAFETY AND PERFORMANCE TARGETS FOR 2023

PARAMETER	2023 TARGET
MAXIMUM WORKER DOSE	≤ 0.50 mSv
AVERAGE WORKER DOSE	≤ 0.055 mSv
CALCULATED DOSE TO MEMBER OF THE PUBLIC	≤ 0.0040 mSv
TOTAL TRITIUM EMISSIONS TO ATMOSPHERE (PER WEEK AVERAGE)	≤ 625 GBq / week
RATIO – TRITIUM EMISSIONS VS. PROCESSED	≤ 0.11
TOTAL TRITIUM EMISSIONS – LIQUID EFFLUENT PATHWAY	≤ 8 GBq
ACTION LEVEL EXCEEDANCES – ENVIRONMENTAL	≤ 1
ACTION LEVEL EXCEEDANCES – RADIATION PROTECTION	≤ 1
CONTAMINATION CONTROL – FACILITY-WIDE PASS / FAIL RATE	≥ 95.5%
LOST TIME INJURIES	0
MINOR INJURIES REPORTABLE TO WSIB	≤ 5
MINOR INCIDENTS / FIRST AID INJURIES (NON-REPORTABLE)	≤ 15

6.3 Planned Modifications and Foreseen Changes

The upcoming year of operation is not expected to involve significant modifications to the facility or our licensed activities, and production levels are expected to remain stable.

SRBT will be continuing to pursue and explore opportunities to improve our operations and our safety performance, and remain committed to ensuring that our environmental impacts are as low as reasonably achievable.

7. Concluding Remarks

Throughout the year, the management and staff of SRBT complied with all regulatory requirements and the conditions of our operating licence.

Our management system remains effective at achieving our operational and safety-related goals, and ensuring effective control of our operations. We continue to adjust and improve our processes in support of the safe and effective operation of our facility, and we continue to use operating experience to continuously improve the system.

Our facility remains within its designed safety basis, and continues to be fit for service. Key structures, systems and components have continued to be maintained diligently and effectively throughout 2022 through the implementation of our Maintenance Program.

Exposures to ionizing radiation to both workers and members of the public continue to remain low, and are far less than the regulatory limits prescribed.

The local environment has remained protected, and the already low level of impact of our operations continues to be reduced over time, as we continue to implement best practices each and every day. Licence limits for our nuclear substance effluent streams continue to be respected with significant margin.

Our conventional health and safety program has continued to ensure our workers are safe, and the security of the facility and all nuclear substances was maintained at all times.

SRBT remains well protected from fire hazards, and have maintained an accepted plan should an emergency condition arise.

Our Public Information Program fully satisfies the requirements of the CNSC. We continue to look for new ways to reach out into our local community in a positive and constructive fashion, and to provide information and data that is of interest to stakeholders and Indigenous communities.

Our website continues to provide the public with a wealth of easy-to-access information on our operations and our safety programs, including a very wide variety of environmental data and safety analyses.

We continue to effectively manage all forms of waste generated by our operations, and continue to look to minimize the amount of waste that must be managed and controlled.

Our decommissioning responsibilities are documented and accepted, and our financial guarantee is fully funded. Although we plan on operating the facility for at least the next

two decades, if not longer, having a complete, self-funded financial guarantee is an important consideration with respect to our regulatory standing, as well as our commitment of being a good community partner.

Safety and excellence in operations shall always remain as the number one overall priority in everything we do, and 2022 was a direct reflection of the success at achieving these goals.

We believe this is reflected in the issuance of a 12-year operating licence for our facility by the Commission, which represents the longest-term licence ever issued to SRBT.

We will always continue to improve our operations and minimize our impact on people and the environment as our company continues to sustainably grow over the coming years.

8. References

[1] Nuclear Substance Processing Facility Operating Licence NSPFOL-13.00/2022, valid from July 1, 2015 to June 30, 2022. Link

[2] Nuclear Substance Processing Facility Licence NSPFL-13.00/2034, valid from July 1, 2022 to June 30, 2034. Link

[3] Transcript of April 27, 2022 Public Hearing on SRBT. Link

[4] CNSC Record of Decision DEC 22-H8. Link

[5] Licence Conditions Handbook – SRB Technologies (Canada) Inc. Nuclear Substance Processing Facility Licence NSPFL-13.00/2034 (CNSC e-Doc 6668496 (Rev. 0)). Link

[6] SRBT Safety Analysis Report – Revision 4. Link

[7] Letter from R. Fitzpatrick (SRBT) to L. Posada (CNSC), *Submission of Revised SRBT Maintenance Program,* dated August 15, 2022 (CNSC e-Doc 6855866).

[8] Letter from L. Posada (CNSC) to R. Fitzpatrick (SRBT), *CNSC Staff Review of SRB Technologies (Canada) Inc.'s Revised Maintenance Program,* dated September 15, 2022 (CNSC e-Doc 6866971).

[9] Letter from S. Levesque (SRBT) to L. Posada (CNSC), *Submission of Effluent Monitoring Program,* dated November 11, 2022 (CNSC e-Doc 6919355).

[10] Letter from L. Posada (CNSC) to S. Levesque (SRBT), *CNSC Staff Review of SRB Technologies (Canada) Inc.'s Revised Effluent Monitoring Program,* dated December 15, 2022 (CNSC e-Doc 6935387).

[11] Letter from S. Levesque (SRBT) to L. Posada (CNSC), *Submission of Waste Management Program and Procedures,* dated November 11, 2022 (CNSC e-Doc 6919345).

[12] Letter from L. Posada (CNSC) to S. Levesque (SRBT), *CNSC Staff Review of SRB Technologies (Canada) Inc.'s Revised Waste Management Program,* dated January 17, 2023 (CNSC e-Doc 6953005).

[13] Letter from M. Tremblay (Health Canada) to J. MacDonald (SRBT), *Certificate of Achievement,* dated June 20, 2022.

[14] Email and attached report from J. MacDonald (SRBT) to cnsc.acr-rac.ccsn@canada.ca, *2022 Annual Compliance Report – 11341-3-28.5,* dated January 16, 2023.

[15] Letter from L. Posada (CNSC) to S. Levesque (SRBT), *CNSC Staff Follow-up Review of SRB Technologies (Canada) Inc.'s Environmental Risk Assessment,* dated April 22, 2021 (e-Doc 6539968).

[16] Letter from S. Levesque (SRBT) to L. Posada (CNSC), *SRBT Response to CNSC Staff Comments on ERA,* dated April 12, 2021.

[17] CSA standard N288.1-14, *Guidelines for calculating derived release limits for radioactive material in airborne and liquid effluents for normal operation of nuclear facilities*

[18] CSA standard N288.1-14, *Guidelines for calculating derived release limits for radioactive material in airborne and liquid effluents for normal operation of nuclear facilities*, Tables C.1, C.2.

[19] CSA standard N288.1-14, *Guidelines for calculating derived release limits for radioactive material in airborne and liquid effluents for normal operation of nuclear facilities*, Table 19.

[20] CSA standard N288.1-14, *Guidelines for calculating derived release limits for radioactive material in airborne and liquid effluents for normal operation of nuclear facilities*, Table 21.

[21] CSA standard N288.1-14, *Guidelines for calculating derived release limits for radioactive material in airborne and liquid effluents for normal operation of nuclear facilities*, Table G.9c.

[22] *Inventory of Radioactive Waste in Canada 2019,* published by Natural Resources Canada. Link

[23] Letter from L. Posada (CNSC) to S. Levesque (SRBT), *CNSC Staff Review of SRB Technologies (Canada) Inc.'s Revised Preliminary Decommissioning Plan – 2019,* dated February 3, 2020 (CNSC e-Doc 6111181).

[24] CNSC Record of Decision DEC 20-H105. Link

9. Appendices

DESCRIPTION **LETTER**

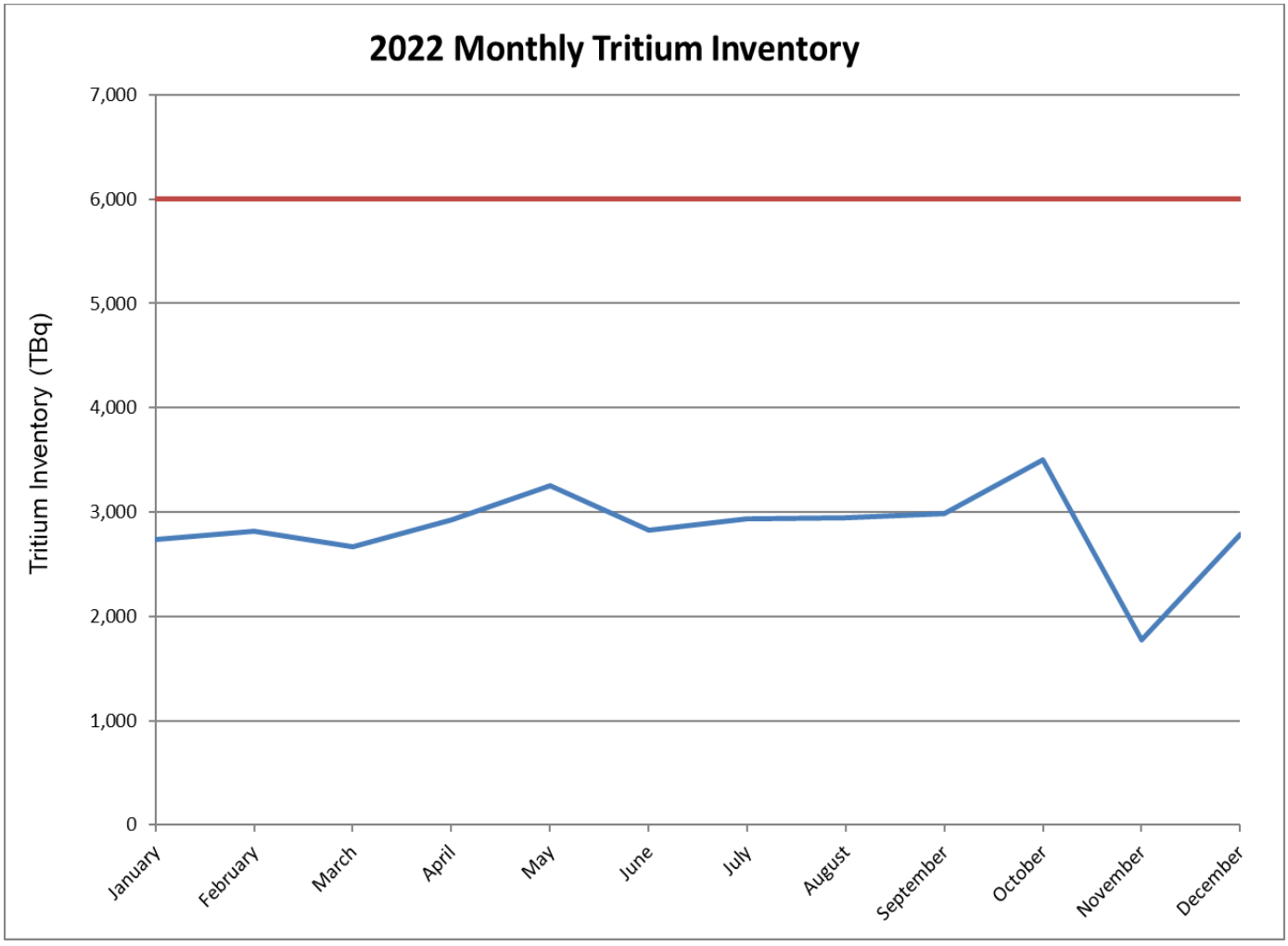
APPENDIX A

Tritium Inventory / Possession

Tritium Inventory / Possession

Month	Month-end H-3 Activity On-Site (TBq)	Percent of Licence Limit (%)
January	2,735	45.6
February	2,813	46.9
March	2,670	44.5
April	2,922	48.7
May	3,254	54.2
June	2,824	47.1
July	2,934	48.9
August	2,944	49.1
September	2,986	49.8
October	3,500	58.3
November	1,779	29.7
December	2,782	46.4
2022 Monthly Average	**2,845**	**47.4**

Note: Tritium possession limit = 6,000 TBq.



APPENDIX B

Equipment Maintenance Information

Equipment Maintenance Information for 2022

Semi-Annual maintenance on HVAC equipment: **Contract:** Black and McDonald	April 28, 2022 Sept 29, 2022
Quarterly maintenance on Rig & Bulk stack units: **Contract:** Black and McDonald	March 2, 2022 June 24, 2022 Sept 22, 2022 Dec 14, 2022
Annual stack verification by a third party on Rig & Bulk stack units: **Contract:** Tab Inspection	Sept 22, 2022
Sprinkler System quarterly maintenance by a third party: **Contract:** Drapeau Automatic Sprinkler Corp	March 29, 2022 June 16, 2022 Sept 15, 2022 Dec 15, 2022
Emergency Lighting & Fire Extinguisher annual inspection by a third party: **Contract:** Layman Fire and Safety	March 23, 2022
Sprinkler System inspection by SRBT:	Weekly
Fire Alarm Components inspection by SRBT:	Weekly
Fire Separation doors inspection by SRBT:	Weekly
Fire Extinguisher inspection by SRBT:	Monthly
Emergency Lights inspection by SRBT:	Monthly
Exit Doors inspected by SRBT:	Weekly
Quarterly maintenance carried out on the compressor: **Contract:** Valley Compressor	March 23, 2022 June 7, 2022 Sept 8, 2022 Dec 15, 2022
Fume Hood Inspections by SRBT:	Monthly
Tritium-in-Air Sample Collector Bubblers maintenance:	Bi-monthly
Tritium-in-Air Sample Collector Bubblers third party annual verification: **Contract:** Canadian Nuclear Laboratories	May 31 – June 14, 2022
Liquid Scintillation Counters third party annual maintenance: **Contract:** PerkinElmer	July 27, 2022

Equipment Maintenance Information for 2022

Real-time Stack Monitoring system verification by SRBT:	Jan 3, 2022 Mar 7, 2022 May 5, 2022 July 4, 2022 Sept 6, 2022 Nov 7, 2022
Monitoring well inspection by SRBT:	March 9, 2022 June 7, 2022 Sept 7, 2022 Dec 7, 2022
Annual IT maintenance inspection by SRBT:	Sept 27, 2022
Non-active air filter inspection by SRBT:	Monthly
Annual Zone Differential Pressure Test by SRBT:	Dec 21, 2022
UV printer maintenance by SRBT:	Monthly
Molding machine maintenance by SRBT:	March 31, 2022 June 30, 2022 Sept 28, 2022 Dec 23, 2022
3D printer maintenance by SRBT:	March 31, 2022 June 30, 2022 Sept 28, 2022 Dec 19, 2022
Fork-crane maintenance by SRBT:	Nov 8, 2022
Forklift maintenance by a third party: **Contract: Hyster**	April 28, 2022
Report of any weakening or possible major failure of any components:	None

All ventilation systems were maintained at a high fitness for service. Corrective maintenance was performed as required. Ventilation equipment maintenance was performed under contract with a fully licensed maintenance and TSSA certified local HVAC contract provider.

All process equipment is serviced and maintained by qualified staff and through contract with companies that specialize in process control systems. All process equipment has been maintained in fully operational condition.

Corrective maintenance is performed on equipment as required, and recorded and tracked over time.

APPENDIX C

Ventilation Maintenance Information

Ventilation Equipment Maintained In 2022

#	TYPE	ZONE SERVICED	LOCATION OF UNIT
1	Gas Furnace	1	Front office / server hallway
1	Mid efficient gas furnace	1	Receiving area
1	Mid efficient gas furnace & central air	1	Stores
1	Mid efficient gas furnace	1	Back bay
1	Heat Recovery unit	1	Receiving area
1	HRV with reheat	2	Coating
2	Makeup air units	1 & 2	Coating room
3	Unit heaters	1 & 3	Rig room, Glass shop, Receiving area
2	A/C wall unit	1	Glass shop, Receiving area
4	Exhaust fans	1 & 2	Coating, Assembly, Glass room, Paint Booth
1	Electric furnace with central air	1	Front office
1	Bulk stack air handling unit	3	Compound
1	Rig stack air handling unit	3	Compound
2	Rig and Bulk stack air handling units pitot tubes	3	Compound
1	Gas furnace with central air	1	Milling / molding

APPENDIX D

Radiological Dose Data

Radiological Dose Data

Rolling five-year effective dose data (2018 - 2022)

ANNUAL DOSE (mSv)	2018	2019	2020	2021	2022	FIVE YEAR AVERAGE
Maximum Dose	0.48	0.57	0.43	0.36	0.46	**0.46**
Average Dose (all records)	0.044	0.065	0.077	0.056	0.048	**0.058**
Average Dose (excluding <0.01))	0.130	0.115	0.093	0.090	0.082	**0.102**
Collective Dose	2.06	2.95	3.30	2.35	2.01	**2.53**

EFFECTIVE DOSE RANGE (mSv)	2018	2019	2020	2021	2022	FIVE YEAR AVERAGE
< 0.01 ('zero dose')	32	20	8	16	18	**19**
0.01 – 0.05	7	10	18	16	16	**13**
0.05 – 0.10	1	6	7	3	2	**4**
0.10 – 0.25	5	5	6	3	3	**4**
0.25 – 0.50	2	3	4	4	3	**3**
0.50 – 1.00	0	1	0	0	0	**0**
>1.00	0	0	0	0	0	**0**
Number of Workers Monitored	47	45	43	42	42	**44**

APPENDIX E

Contamination Assessment Data

Contamination Assessment Data

Q1 2022 Routine Contamination Assessment Summary - Zone 3

Zone 3 Areas	Assessments	Pass	Pass Rate
Rig 7 Floor	63	63	100.00%
Rig 7	63	63	100.00%
Rig 1 Floor	63	61	96.83%
Rig 1	63	62	98.41%
Flr @ Rig 6	63	62	98.41%
Rig 6	63	62	98.41%
Floor @ Rig 8	63	61	96.83%
Rig 8	63	62	98.41%
Floor @ Rig 5	63	60	95.24%
Rig 5	63	63	100.00%
Waste Room Door	60	60	100.00%
Muffle Fume hood	60	60	100.00%
Liquid Effluent Barrel	63	63	100.00%
Flr @ Barrier	63	62	98.41%
Laser Room Floor	63	63	100.00%
EIP Area	63	63	100.00%
Laser Rm F/H	63	62	98.41%
Table between Rigs	60	59	98.33%
Trit Lab Flr random	63	59	93.65%
Photometer Room	60	60	100.00%
Disassembly Fumehood	63	58	92.06%
Bulk Fume hood	60	57	95.00%
Disassembly Sash	63	63	100.00%
Trit Lab desk	63	59	93.65%
Waste Room Shelves	3	3	100.00%
Log Book Area	3	3	100.00%
Scint Table	3	3	100.00%
Wash Faucet	3	3	100.00%
Bulk Cabinet	3	3	100.00%
TOTAL	**1,512**	**1,482**	**98.02%**

Q1 2022 Routine Contamination Assessment Summary - Zone 2

Zone 2 Areas	Assessments	Pass	Pass Rate
Floor at Barrier	38	38	100.00%
Work Area Floors	38	34	89.47%
Work Counters	38	37	97.37%
Work Area Floor #2	38	38	100.00%
WIP Cabinets	38	35	92.11%
Table at Welder	37	37	100.00%
Spray Booth Cabinet	37	36	97.30%
Paint Booth	38	38	100.00%
Dark Room	38	38	100.00%
Bubbler Fume hood	37	35	94.59%
Liquid Effluent Barrel	38	38	100.00%
Insp. Prep. Counter	38	36	94.74%
Freezer	1	1	100.00%
Blue Bins	1	1	100.00%
Photometer Room	1	1	100.00%
TOTAL	**456**	**443**	**97.15%**

Q1 2022 Routine Contamination Assessment Summary - Zone 1

Zone 1 Areas	Assessments	Pass	Pass Rate
Lunch Room	13	13	100.00%
LSC Room	13	13	100.00%
RR Ante Rm	13	13	100.00%
RR Barrier	13	13	100.00%
Assy Barrier	13	13	100.00%
Disassembly Table	13	9	69.23%
Disassembly Storage Hall	13	13	100.00%
Liquid Effluent Barrel	13	13	100.00%
Disassembly Cabinet	13	12	92.31%
Floor Outside Scint Lab	13	13	100.00%
Washrooms	13	13	100.00%
Shipping Floor	13	13	100.00%
TOTAL	**156**	**151**	**96.79%**

Q2 2022 Routine Contamination Assessment Summary - Zone 3

Zone 3 Areas	Assessments	Pass	Pass Rate
Rig 7 Floor	61	55	90.16%
Rig 7	61	61	100.00%
Rig 1 Floor	61	60	98.36%
Rig 1	61	61	100.00%
Flr @ Rig 6	61	58	95.08%
Rig 6	61	61	100.00%
Floor @ Rig 8	61	57	93.44%
Rig 8	61	60	98.36%
Floor @ Rig 5	61	57	93.44%
Rig 5	61	61	100.00%
Waste Room Door	61	61	100.00%
Muffle Fume hood	61	60	98.36%
Liquid Effluent Barrel	61	61	100.00%
Flr @ Barrier	61	59	96.72%
Laser Room Floor	61	58	95.08%
EIP Area	61	58	95.08%
Laser Rm F/H	61	46	75.41%
Table between Rigs	61	59	96.72%
Trit Lab Flr random	61	58	95.08%
Photometer Room	61	61	100.00%
Disassembly Fumehood	61	55	90.16%
Bulk Fume hood	61	53	86.89%
Disassembly Sash	61	58	95.08%
Trit Lab desk	61	58	95.08%
TOTAL	**1,464**	**1,396**	**95.36%**

Q2 2022 Routine Contamination Assessment Summary - Zone 2

Zone 2 Areas	Assessments	Pass	Pass Rate
Floor at Barrier	37	37	100.00%
Work Area Floors	37	37	100.00%
Work Counters	37	37	100.00%
Work Area Floor #2	37	37	100.00%
WIP Cabinets	37	36	97.30%
Table at Welder	37	37	100.00%
Spray Booth Cabinet	37	37	100.00%
Paint Booth	37	37	100.00%
Dark Room	37	37	100.00%
Bubbler Fume hood	37	37	100.00%
Liquid Effluent Barrel	37	36	97.30%
Insp. Prep. Counter	37	36	97.30%
TOTAL	**444**	**441**	**99.32%**

Q2 2022 Routine Contamination Assessment Summary - Zone 1

Zone 1 Areas	Assessments	Pass	Pass Rate
Lunch Room	13	13	100.00%
LSC Room	13	13	100.00%
RR Ante Rm	13	13	100.00%
RR Barrier	13	13	100.00%
Assy Barrier	13	13	100.00%
Disassembly Table	13	13	100.00%
Disassembly Storage Hall	13	13	100.00%
Liquid Effluent Barrel	13	13	100.00%
Disassembly Cabinet	13	12	92.31%
Floor Outside Scint Lab	13	13	100.00%
Washrooms	13	13	100.00%
Shipping Floor	13	13	100.00%
TOTAL	**156**	**155**	**99.36%**

Q3 2022 Routine Contamination Assessment Summary - Zone 3

Zone 3 Areas	Assessments	Pass	Pass Rate
Rig 7 Floor	62	61	98.39%
Rig 7	62	60	96.77%
Rig 1 Floor	62	60	96.77%
Rig 1	62	62	100.00%
Flr @ Rig 6	62	62	100.00%
Rig 6	62	62	100.00%
Floor @ Rig 8	62	61	98.39%
Rig 8	62	62	100.00%
Floor @ Rig 5	62	61	98.39%
Rig 5	62	62	100.00%
Waste Room Floor	51	51	100.00%
Scint Table	51	49	96.08%
Flr @ Barrier	62	60	96.77%
Handle of Oven	51	51	100.00%
Glass Crusher Sash	51	50	98.04%
Trit Lab desk	62	60	96.77%
Laser Room Floor	62	59	95.16%
EIP Area	62	59	95.16%
Laser Rm F/H	62	57	91.94%
Trit Lab Flr random	62	60	96.77%
Disassembly Fumehood	62	58	93.55%
Disassembly Sash	62	62	100.00%
Bulk Fume hood	62	55	88.71%
Bulk Lower Cabinets	51	51	100.00%
Waste Room Door	11	11	100.00%
Muffle Fume hood	11	11	100.00%
Liquid Effluent Barrel	11	11	100.00%
Table between Rigs	11	10	90.91%
Photometer Room	11	11	100.00%
TOTAL	**1,488**	**1,449**	**97.38%**

Q3 2022 Routine Contamination Assessment Summary - Zone 2

Zone 2 Areas	Assessments	Pass	Pass Rate
Floor at Barrier	36	33	91.67%
Work Area Floors	36	33	91.67%
Work Counters	36	36	100.00%
Work Area Floor #2	36	33	91.67%
UV Printing Cabinets	29	29	100.00%
WIP Cabinets	36	36	100.00%
Cleaning Cabinet	29	29	100.00%
Dark Room	36	35	97.22%
Bubbler Fume hood	36	35	97.22%
Inspection Room Table	29	29	100.00%
Liquid Effluent Barrel	36	35	97.22%
Insp. Prep. Counter	36	35	97.22%
Table at Welder	7	7	100.00%
Spray Booth Cabinet	7	7	100.00%
Paint Booth	7	7	100.00%
TOTAL	**432**	**417**	**96.99%**

Q3 2022 Routine Contamination Assessment Summary - Zone 1

Zone 1 Areas	Assessments	Pass	Pass Rate
Lunch Room	13	13	100.00%
LSC Room	13	13	100.00%
LSC Lab Waste Pail	11	11	100.00%
LSC Waste Barrel	11	11	100.00%
RR Ante Rm	13	13	100.00%
RR Barrier	13	11	84.62%
Assy Barrier	13	13	100.00%
Disassembly Storage Hall	13	13	100.00%
Disassembly Table	13	13	100.00%
Disassembly Cabinet	13	13	100.00%
Shipping Storage Area	11	11	100.00%
Shipping Floor	13	13	100.00%
Liquid Effluent Barrel	2	2	100.00%
Floor Outside Scint Lab	2	2	100.00%
Washrooms	2	2	100.00%
TOTAL	**156**	**154**	**98.72%**

Q4 2022 Routine Contamination Assessment Summary - Zone 3

Zone 3 Areas	Assessments	Pass	Pass Rate
Rig 7 Floor	58	57	98.28%
Rig 7	58	57	98.28%
Rig 1 Floor	58	56	96.55%
Rig 1	58	57	98.28%
Flr @ Rig 6	58	58	100.00%
Rig 6	58	58	100.00%
Floor @ Rig 8	58	57	98.28%
Rig 8	58	57	98.28%
Floor @ Rig 5	58	58	100.00%
Rig 5	58	57	98.28%
Waste Room Wall	56	55	98.21%
Scint Table	58	58	100.00%
Flr @ Barrier	58	56	96.55%
Table at Barrier	56	55	98.21%
Operations Log	56	56	100.00%
Computer Peripherals	56	55	98.21%
Laser Room Floor	58	56	96.55%
EIP Area	58	58	100.00%
Laser Rm F/H	58	55	94.83%
Laser Stock Cabinet	56	53	94.64%
Trit Lab Flr random	58	56	96.55%
Disassembly Fumehood	58	53	91.38%
Bulk Fume hood	58	50	86.21%
Trit Lab desk	58	57	98.28%
Waste Room Floor	2	2	100.00%
Bulk Lower Cabinets	2	2	100.00%
Handle of Oven	2	2	100.00%
Glass Crusher Sash	2	2	100.00%
Disassembly Sash	2	2	100.00%
TOTAL	**1,392**	**1,355**	**97.34%**

Q4 2022 Routine Contamination Assessment Summary - Zone 2

Zone 2 Areas	Assessments	Pass	Pass Rate
Floor at Barrier	35	34	97.14%
Work Area Floors	35	34	97.14%
Work Counters	35	34	97.14%
Work Area Floor #2	35	35	100.00%
Door Knobs	34	33	97.06%
WIP Cabinets	35	35	100.00%
Shelf in Silk Screen	34	33	97.06%
Photometer Room	34	34	100.00%
Bubbler Fume hood	35	34	97.14%
Inspection Room Table	35	34	97.14%
Liquid Effluent Barrel	35	35	100.00%
Insp. Prep. Counter	35	35	100.00%
UV Printing Cabinets	1	1	100.00%
Cleaning Cabinet	1	1	100.00%
Dark Room	1	1	100.00%
TOTAL	**420**	**413**	**98.33%**

Q4 2022 Routine Contamination Assessment Summary - Zone 1

Zone 1 Areas	Assessments	Pass	Pass Rate
Lunch Room	12	12	100.00%
LSC Room	12	12	100.00%
LSC Lab Waste Pail	12	12	100.00%
LSC Waste Barrel	12	12	100.00%
RR Ante Rm	12	12	100.00%
RR Barrier	12	11	91.67%
Assy Barrier	12	12	100.00%
Disassembly Storage Hall	12	12	100.00%
Disassembly Table	12	11	91.67%
Disassembly Cabinet	12	12	100.00%
Disassembly PPE	11	10	90.91%
Shipping Floor	12	12	100.00%
Shipping Storage Area	1	1	100.00%
TOTAL	**144**	**141**	**97.92%**

Overall Facility Summary

Facility Zone	Assessments	Pass	Pass Rate
ZONE 3	5,856	5,682	97.03%
ZONE 2	1,752	1,716	97.95%
ZONE 1	612	601	98.20%
2022 ALL ZONES	**8,220**	**7,999**	**97.31%**

APPENDIX F

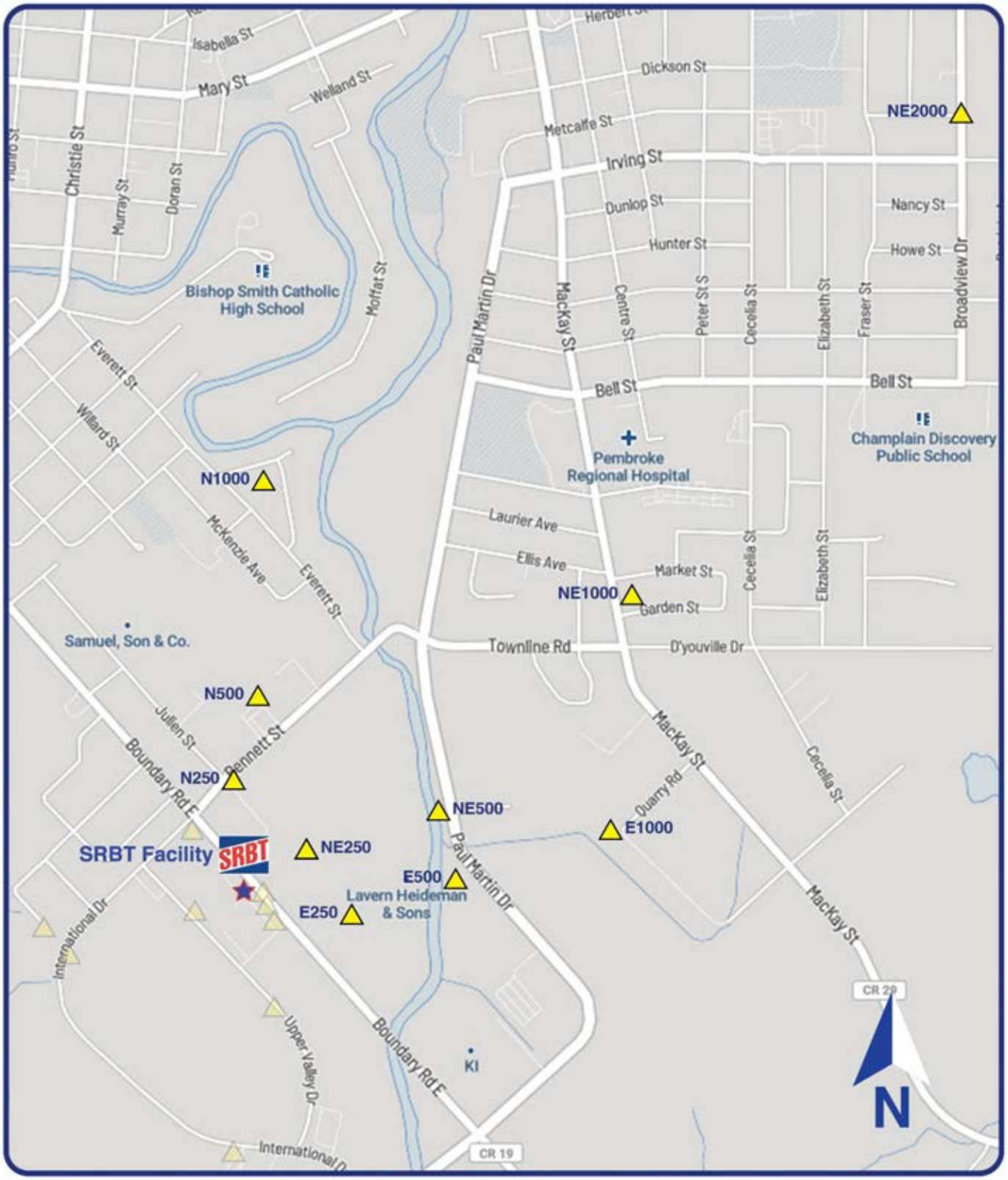
Monthly Average Concentrations of Tritium in Air in Environment

Monthly Average Concentrations of Tritium in Air in Environment

2022 Environment Monitoring Program
Passive Air Sampling System

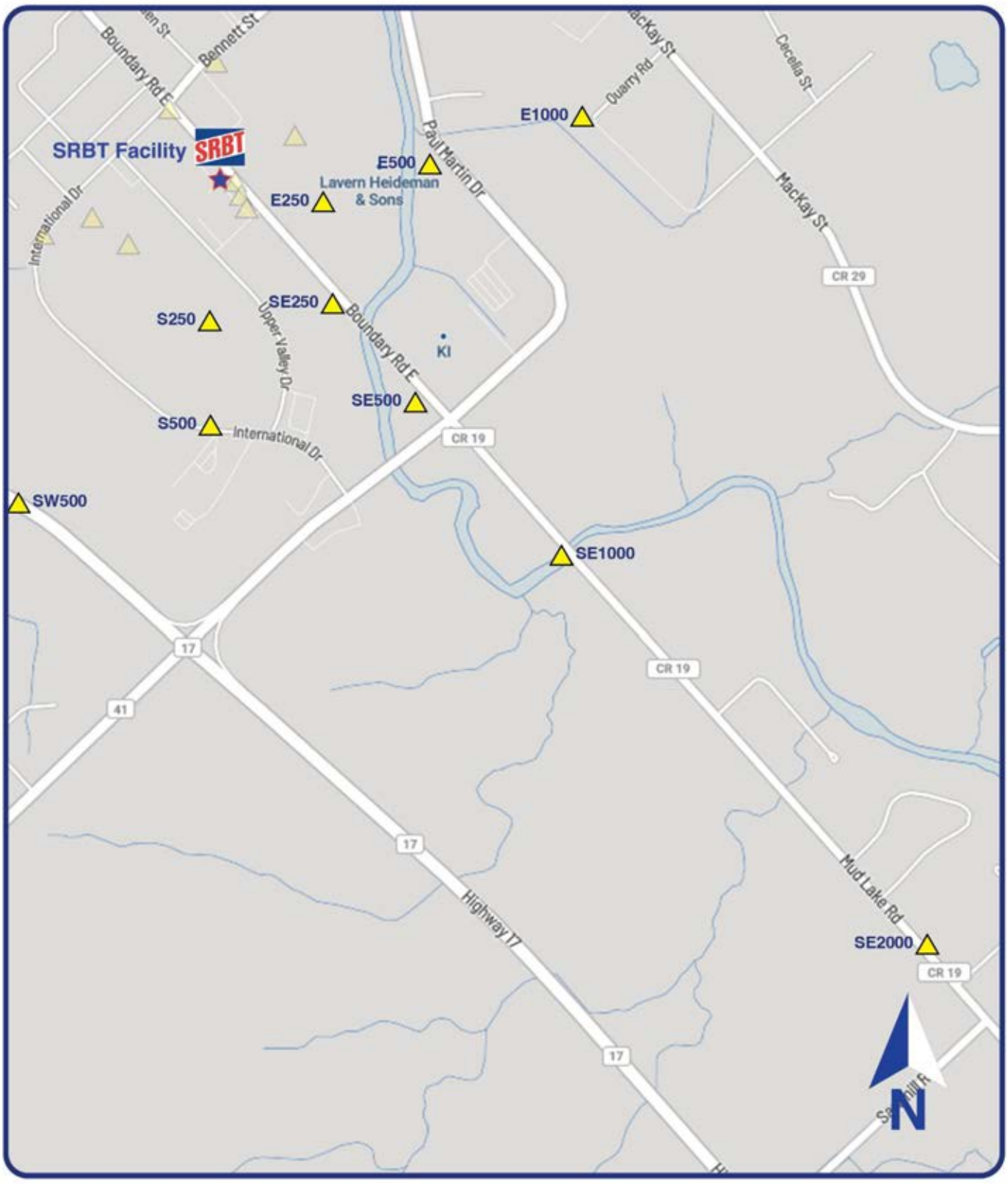
Sampler No.	Sampler ID	Location	Dist. to SRBT	(Bq/m^3) Jan Dec 28 - Feb 2	Feb Feb 2 - Mar 1	Mar Mar 1 - Apr 5	Apr Apr 5 - May 4	May May 4 - June 1	Jun June 1 - June 29	Jul June 29 - July 27	Aug July 27 - Aug 31	Sep Aug 31 - Sept 28	Oct Sept 28 - Nov 2	Nov Nov 2 - Nov 30	Dec Nov 30 - Jan 4	Average
		Minimum Detectable Activity (Bq/m^3)		*0.53*	*0.72*	*0.55*	*0.65*	*0.66*	*0.71*	*0.66*	*0.55*	*0.71*	*0.59*	*0.69*	*0.54*	*0.63*
1	N250	N 45º 48.486' W 077º 07.092' Elev. 137m	322m	0.58	1.22	1.31	0.67	3.00	1.21	2.00	1.77	1.75	2.86	3.11	1.94	**1.79**
2	N500	N 45º 48.572' W 077º 07.008' Elev. 134m	493m	0.53	0.74	0.86	0.65	0.66	1.00	1.03	1.69	1.36	1.09	0.86	0.80	**0.94**
3	N1000	N 45º 48.869' W 077º 06.997' Elev. 135m	1040m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.63	1.82	0.80	**0.75**
4 (PAS #4)	NW250	N 45º 48.412' W 077º 07.189' Elev. 137m	222m	1.11	3.89	1.57	1.83	3.32	3.36	2.28	3.17	4.36	7.74	5.32	1.89	**3.32**
5	NW500	N 45º 48.577' W 077º 07.382' Elev. 134m	615m	0.53	0.85	0.60	0.83	0.75	1.54	0.66	1.26	1.50	2.74	1.75	0.91	**1.16**
6 (PAS # 8)	NW1000	N 45º 48.754' W 077º 07.599' Elev. 130m	1050m	0.53	0.72	0.55	0.65	0.66	0.79	0.66	0.55	1.14	1.46	1.75	0.77	**0.85**
7	NW2000	N 45º 49.141' W 077º 08.090' Elev. 139m	2000m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.83	1.14	0.54	**0.69**
8	W250	N 45º 48.300' W 077º 07.323' Elev. 138m	297m	0.53	0.72	0.83	1.60	3.32	3.39	0.90	1.49	1.50	1.74	0.93	1.77	**1.56**
9	W500	N 45º 48.288' W 077º 07.393' Elev. 137m	389m	0.53	0.72	0.83	0.65	0.93	1.57	0.66	0.57	1.00	1.00	0.69	1.06	**0.85**
10	W1000	N 45º 48.306' W 077º 07.630' Elev. 134m	691m	0.56	*0.72*	*0.55*	0.77	1.96	1.32	0.66	1.29	2.54	0.74	0.86	0.94	**1.08**
11	SW250	N 45º 48.247' W 077º 07.206' Elev. 140m	183m	0.53	0.72	0.89	0.65	0.66	1.04	0.66	1.51	2.43	0.59	0.69	1.23	**0.97**
12	SW500	N 45º 47.896' W 077º 07.307' Elev. 148m	839m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.63**
13	SW1000	N 45º 47.599' W 077º 07.543' Elev. 149m	1470m	0.53	0.72	0.55	0.65	0.66	0.71	1.34	0.55	0.71	*0.59*	1.00	0.54	**0.71**
14	SW2000	N 45º 47.408' W 077º 07.866' Elev. 155m	2110m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.63**
15	S250	N 45º 48.129' W 077º 07.014' Elev. 131m	356m	0.53	0.72	1.23	1.80	0.71	2.14	1.93	1.66	2.29	0.69	0.89	1.54	**1.34**
16	S500	N 45º 48.029' W 077º 07.110' Elev. 143m	532m	0.53	0.72	0.63	0.65	0.66	1.14	0.93	0.55	0.71	0.74	0.69	0.77	**0.73**
17 (PAS # 12)	S1000	N 45º 46.466' W 077º 07.441' Elev. 158m	1450m	0.53	0.72	0.55	0.65	0.66	0.71	1.34	0.55	0.71	0.59	0.69	0.54	**0.69**
18	SE250	N 45º 48.189' W 077º 06.874' Elev. 132m	365m	2.44	2.19	2.94	2.07	1.71	5.07	2.83	2.51	4.75	1.83	2.86	3.46	**2.89**
19	SE500	N 45º 48.108' W 077º 06.783' Elev. 123m	554m	1.25	0.72	1.74	0.67	0.66	2.25	1.59	1.20	2.50	1.06	1.54	1.77	**1.41**
20	SE1000	N 45º 47.894' W 077º 06.501' Elev. 120m	1090m	0.53	0.72	0.74	1.67	0.66	1.21	1.14	0.91	0.75	0.59	1.32	0.66	**0.91**
21	SE2000	N 45º 47.505' W 077º 05.978' Elev. 137m	2080m	0.53	***No Sample***	0.55	0.77	0.66	0.71	0.76	0.77	0.71	0.59	0.69	0.60	**0.67**
22	E250	N 45º 80.564' W 077º 11.556' Elev. 131m	220m	0.53	0.72	2.31	1.57	1.21	7.04	6.69	6.23	6.07	0.89	1.50	1.26	**3.00**
23	E500	N 45º 48.333' W 077º 06.693' Elev. 132m	520m	0.53	0.72	0.55	0.65	0.66	1.71	1.24	0.74	1.00	0.59	0.69	0.66	**0.81**
24	E1000	N 45º 48.303' W 077º 06.260' Elev. 143m	1080m	0.53	0.72	0.55	0.65	0.66	1.14	0.66	0.55	0.71	0.59	0.69	0.54	**0.67**
25	NE250	N 45º 48.371' W 077º 06.964' Elev. 124m	198m	0.67	0.78	2.51	1.17	16.54	5.79	10.45	4.43	3.96	0.83	1.44	1.71	**4.19**
26	NE500	N 45º 48.421' W 077º 06.732' Elev. 131m	508m	0.53	0.72	0.89	0.65	0.75	1.64	2.10	1.26	0.96	0.60	0.69	0.54	**0.94**
27	NE1000	N 45º 48.683' W 077º 06.441' Elev. 148m	1100m	0.53	0.72	0.55	0.65	0.66	0.71	0.72	0.55	0.71	0.63	0.69	0.66	**0.65**
28	NE2000	N 45º 49.116' W 077º 05.843' Elev. 156m	2200m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.63**
(PAS #1)		N 45º 48.287' W 077º 07.123' Elev. 129m	94.1m	1.06	4.37	2.06	3.27	2.54	10.39	13.59	9.51	7.50	5.09	1.93	7.71	**5.75**
(PAS #2)		N 45º 48.325' W 077º 07.132' Elev. 132m	52.8m	1.72	2.44	2.69	2.73	11.71	12.82	2.90	3.46	5.68	4.91	1.64	4.69	**4.78**
(PAS #13)		N 45º 48.262' W 077º 07.093' Elev. 132m	61.5m	0.53	1.93	0.97	0.65	1.71	4.79	4.59	6.37	5.32	1.74	0.86	1.20	**2.56**
4-2	NW250	N 45º 48.412' W 077º 07.189' Elev. 137m	222m	0.92	3.00	1.37	1.67	2.36	2.57	2.00	3.17	4.21	6.97	4.57	1.83	**2.89**
11-2	SW250	N 45º 48.247' W 077º 07.206' Elev. 140m	183m	0.53	0.72	0.66	0.65	0.66	0.86	0.66	1.51	2.39	0.59	0.69	0.71	**0.89**
18-2	SE250	N 45º 48.189' W 077º 06.874' Elev. 132m	365m	2.28	2.04	2.49	2.03	1.07	4.25	2.52	1.91	4.46	1.49	1.63	1.80	**2.33**
25-2	NE250	N 45º 48.371' W 077º 06.964' Elev. 124m	198m	0.53	0.72	1.37	0.80	1.29	4.96	7.66	3.97	2.89	0.80	1.36	0.91	**2.27**
Maika (PAS # 10)	SW	N 45º 46.367' W 077º 11.447' Elev. 149m	6690m	0.53	0.72	0.55	0.65	0.66	0.71	0.93	0.55	0.71	0.59	0.69	0.54	**0.65**
Maika	Duplicate	Same as above	6690m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.63**
Fitzpatrick	SE	N 45º 44.818' W 076º 59.822' Elev. 159m	11400m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.63**
Petawawa	NW	N 45º 51.497' W 077º 12.828' Elev. 149m	9480m	2.92	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	0.69	0.54	**0.83**
Farm	NE	N 45º 53.071' W 076º 56.768' Elev. 142m	16000m	0.53	0.72	0.55	0.65	0.66	0.71	0.66	0.55	0.71	0.59	3.75	0.60	**0.89**
Results shaded in blue are below minimum detectable activity			Sum	30.88	43.61	41.39	40.87	70.06	94.93	84.02	71.16	83.67	58.54	55.56	51.13	60.54

MAPS OF PAS STATIONS



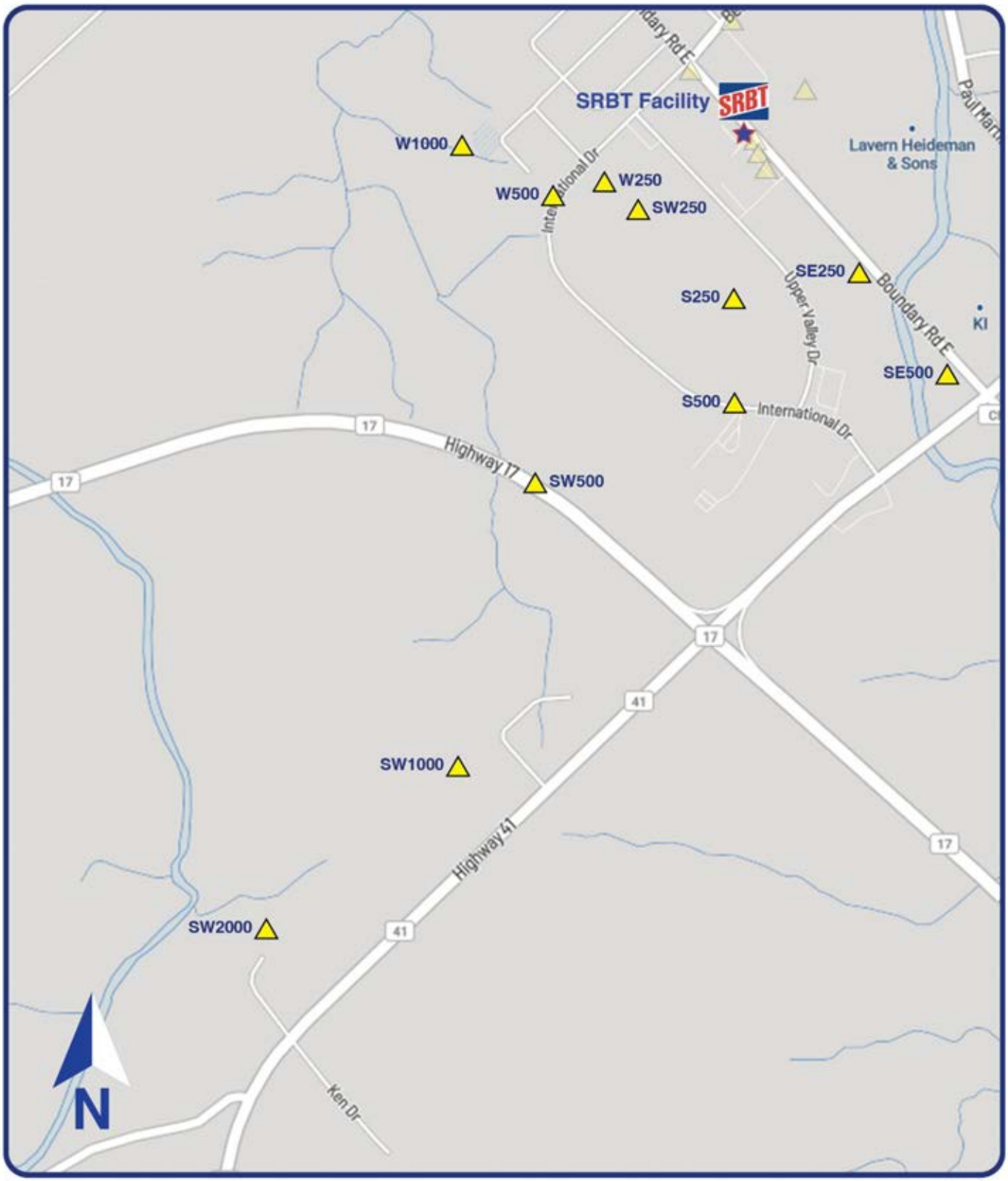
PAS Stations N / NE / E ▲

MAPS OF PAS STATIONS



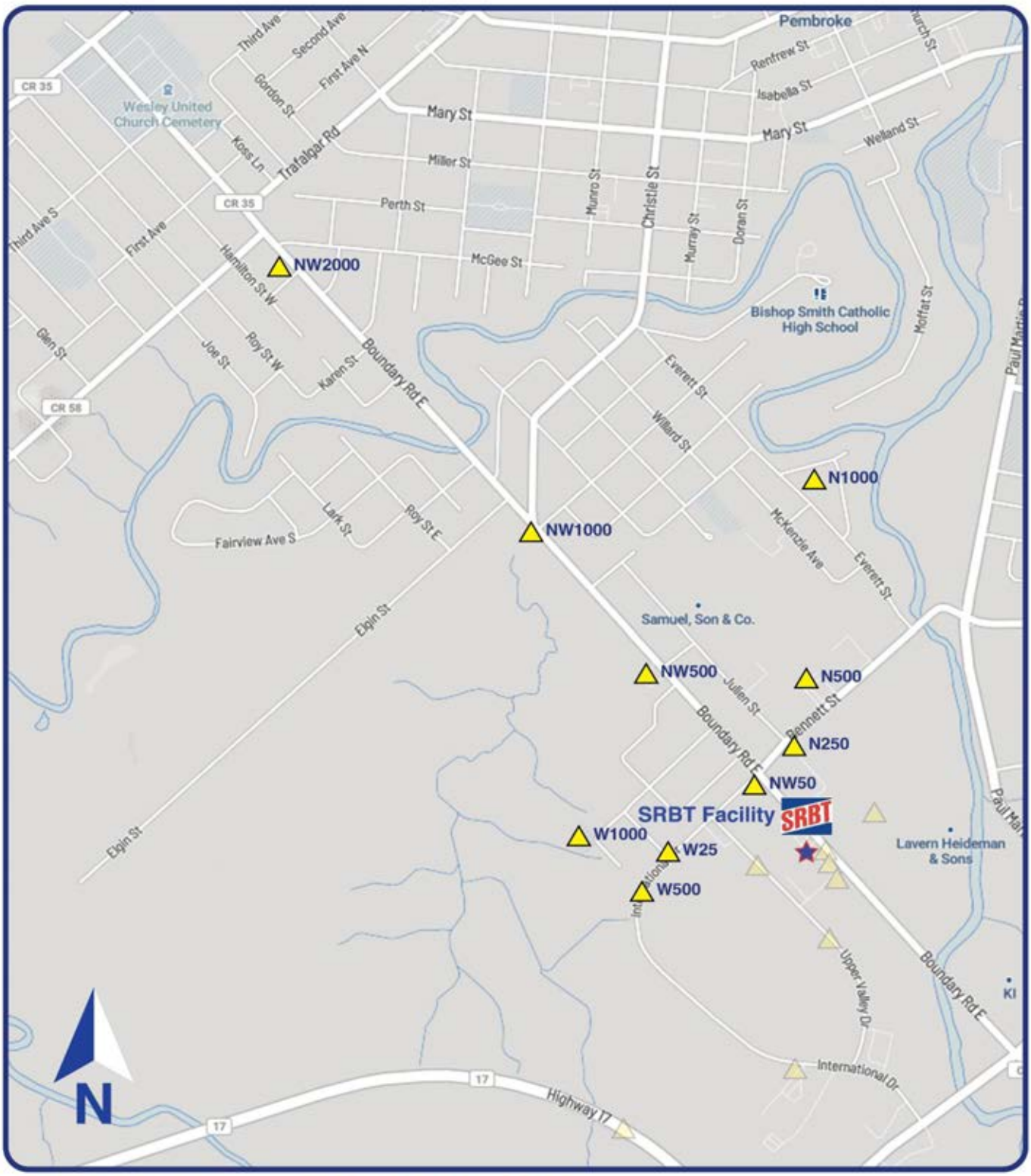
PAS Stations S / SE / E △

MAPS OF PAS STATIONS



PAS Stations W / SW / S ▲

MAPS OF PAS STATIONS



PAS Stations W / NW / N ▲

APPENDIX G

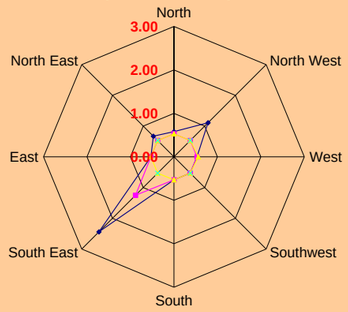
Wind Direction Information

2022 Directional Data

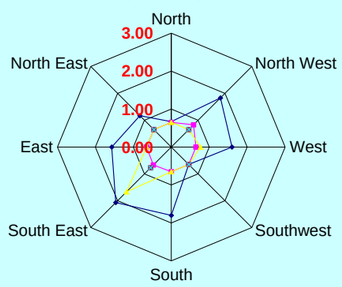
Passive Air Sampling Data (Results in Bq/m3)

Direction	January				February				March				April				May				June				July				August				September				October				November				December			
	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M	250 M	500 M	1000 M	2000 M
North	0.58	0.53	0.53		1.22	0.74	0.72		1.31	0.86	0.55		0.67	0.65	0.65		3.00	0.66	0.66		1.21	1.00	0.71		2.00	1.03	0.66		1.77	1.69	0.55		1.75	1.36	0.71		2.86	1.09	0.63		3.11	0.86	1.82		1.94	0.80	0.80	
North West	1.11	0.53	0.53	0.53	3.89	0.85	0.72	0.72	1.57	0.60	0.55	0.55	1.83	0.83	0.65	0.65	3.32	0.75	0.66	0.66	3.36	1.54	0.79	0.71	2.28	0.66	0.66	0.66	3.17	1.26	0.55	0.55	4.36	1.50	1.14	0.71	7.74	2.74	1.46	0.83	5.32	1.75	1.75	1.14	1.89	0.91	0.77	0.54
West	0.53	0.53	0.56		0.72	0.72	0.72		0.83	0.83	0.55		1.60	0.65	0.77		3.32	0.93	1.96		3.39	1.57	1.32		0.90	0.66	0.66		1.49	0.57	1.29		1.50	1.00	2.54		1.74	1.00	0.74		0.93	0.69	0.86		1.77	1.06	0.94	
Southwest	0.53	0.53	0.53	0.53	0.72	0.72	0.72	0.72	0.89	0.55	0.55	0.55	0.65	0.65	0.65	0.65	0.66	0.66	0.66	0.66	1.04	0.71	0.71	0.71	0.66	0.66	1.34	0.66	1.51	0.55	0.55	0.55	2.43	0.71	0.71	0.71	0.59	0.59	0.59	0.59	0.69	0.69	1.00	0.69	1.23	0.54	0.54	0.54
South	0.53	0.53	0.53		0.72	0.72	0.72		1.23	0.63	0.55		1.80	0.65	0.65		0.71	0.71	0.66		2.14	1.14	0.71		1.93	0.93	1.34		1.66	0.55	0.55		2.29	0.71	0.71		0.69	0.74	0.59		0.89	0.69	0.69		1.54	0.77	0.54	
South East	2.44	1.25	0.53	0.53	2.19	0.72	0.72	No Samp	2.94	1.74	0.74	0.55	2.07	0.67	1.67	0.77	1.71	0.66	0.66	0.66	5.07	2.25	1.21	0.71	2.83	1.59	1.14	0.76	2.51	1.20	0.91	0.77	4.75	2.50	0.75	0.71	1.83	1.06	0.59	0.59	2.86	1.54	1.32	0.69	3.46	1.77	0.66	0.60
East	0.53	0.53	0.53		0.72	0.72	0.72		2.31	0.55	0.55		1.57	0.65	0.65		1.21	0.66	0.66		7.04	1.71	1.14		6.69	1.24	0.66		6.23	0.74	0.55		6.07	1.00	0.71		0.89	0.59	0.59		1.50	0.69	0.69		1.26	0.66	0.54	
North East	0.67	0.53	0.53	0.53	0.78	0.72	0.72	0.72	2.51	0.89	0.55	0.55	1.17	0.65	0.65	0.65	16.54	0.75	0.66	0.66	5.79	1.64	0.71	0.71	10.45	2.10	0.72	0.66	4.43	1.26	0.55	0.55	3.96	0.96	0.71	0.71	0.83	0.60	0.63	0.59	1.44	0.69	0.69	0.69	1.71	0.54	0.66	0.54
	1st Quarter												2nd Quarter												3rd Quarter												4th Quarter											

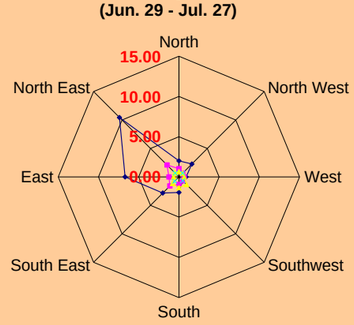
January
(Dec. 28 - Feb. 2)



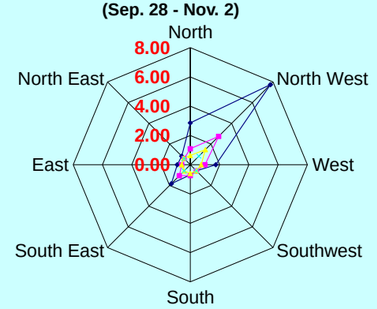
April
(Apr. 5 - May 4)



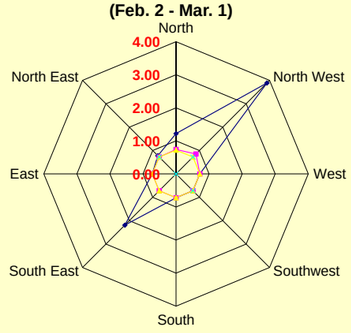
July
(Jun. 29 - Jul. 27)



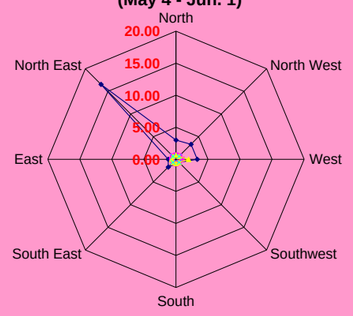
October
(Sep. 28 - Nov. 2)



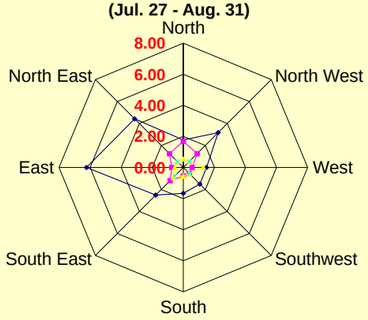
February
(Feb. 2 - Mar. 1)



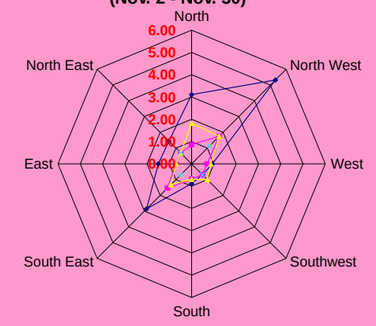
May
(May 4 - Jun. 1)



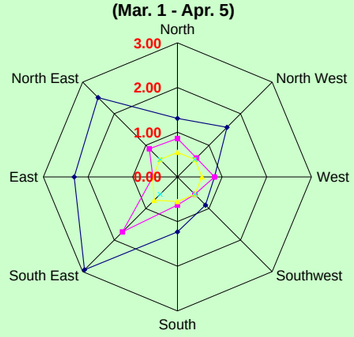
August
(Jul. 27 - Aug. 31)



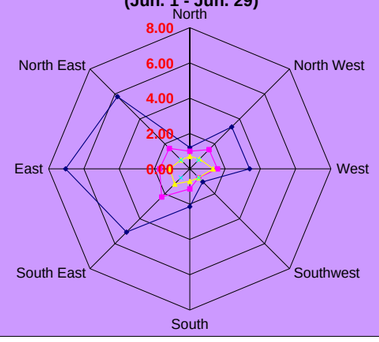
November
(Nov. 2 - Nov. 30)



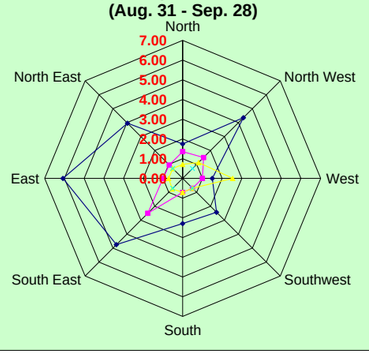
March
(Mar. 1 - Apr. 5)



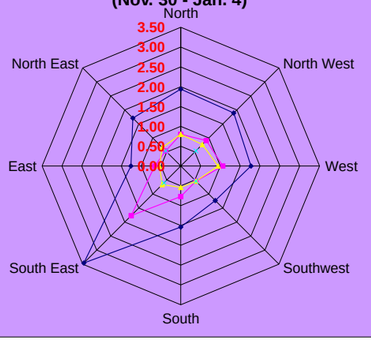
June
(Jun. 1 - Jun. 29)



September
(Aug. 31 - Sep. 28)



December
(Nov. 30 - Jan. 4)



250 M 500 M 1000 M 2000 M

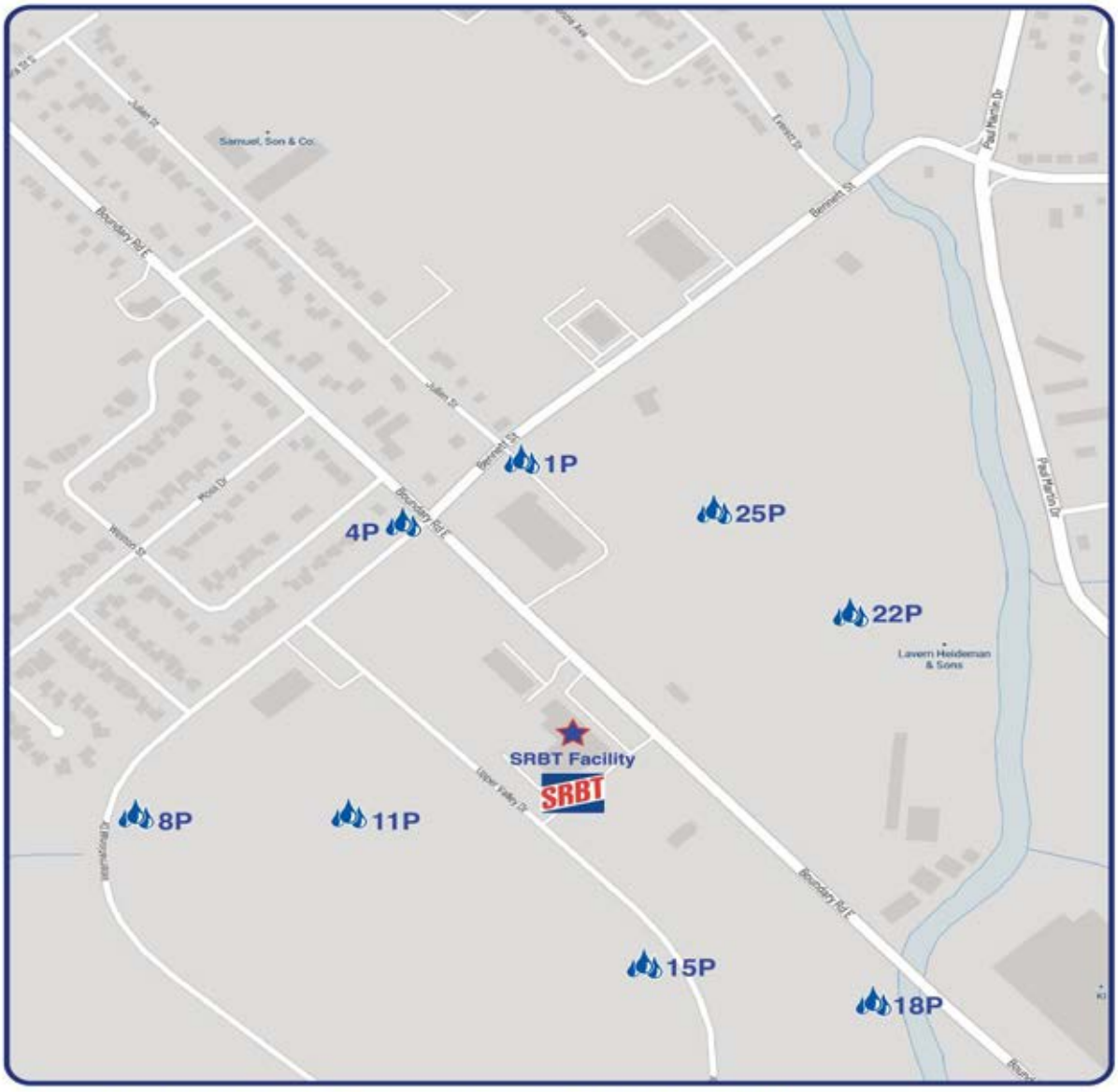
APPENDIX H

Precipitation Monitoring Data

Precipitation Monitoring Data

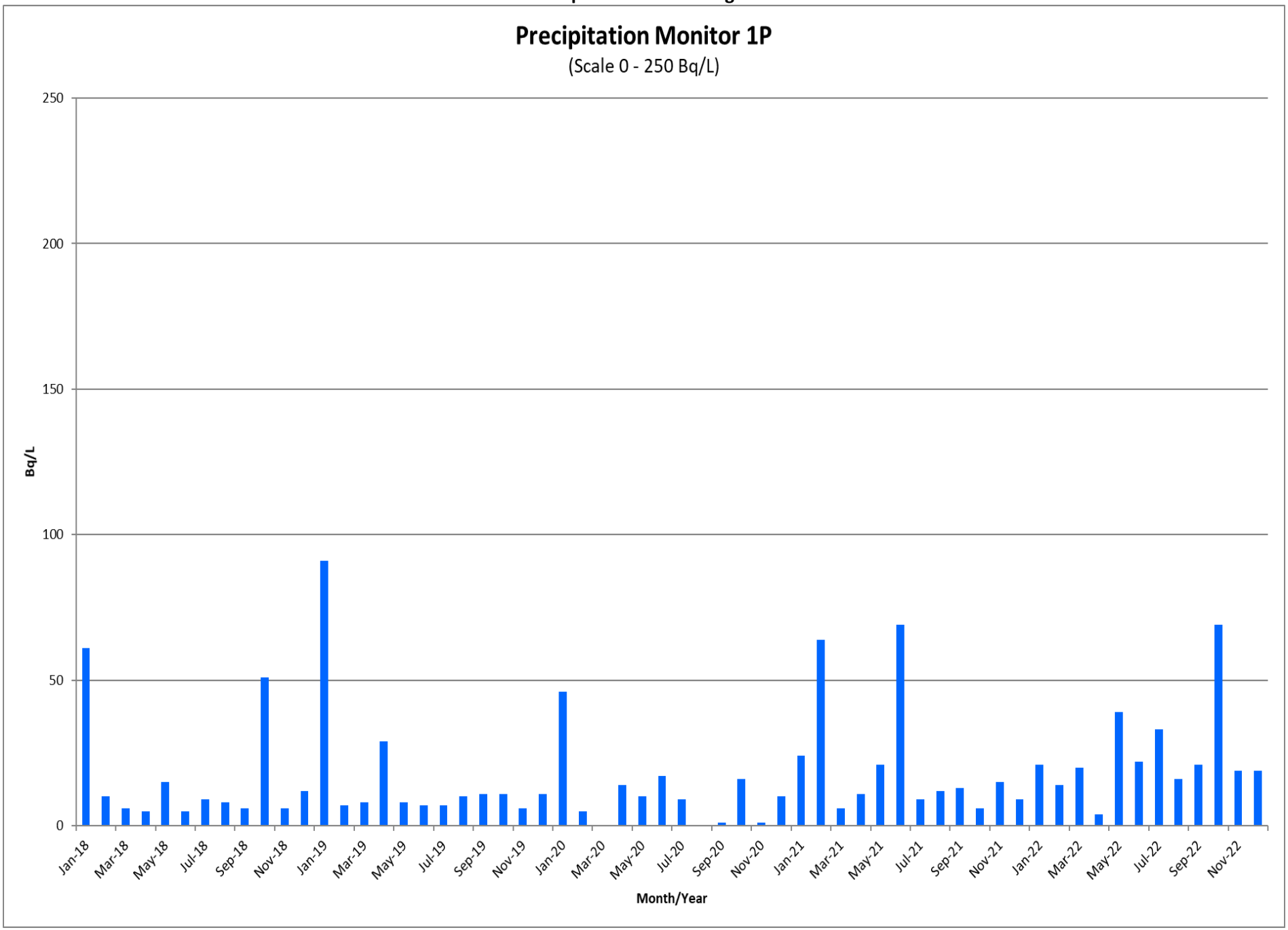
PRECIPITATION SAMPLERS									
	1P	4P	8P	11P	15P	18P	22P	25P	AVG
Sample Collection - Date Range	Bq/L								
Dec. 28, 2021 - Feb. 2, 2022	21	109	24	1	21	139	8	2	41
Feb. 2, 2022 - Mar. 1, 2022	14	23	17	80	29	148	9	13	42
Mar. 1, 2022 - Apr. 5, 2022	20	30	4	7	15	No sample	11	4	13
Apr. 5, 2022 - May 4, 2022	4	64	20	20	12	33	50	18	28
May 4, 2022 - Jun. 1, 2022	39	17	17	9	9	34	11	6	18
Jun. 1, 2022 - Jun. 29, 2022	22	76	42	50	33	154	45	23	56
Jun. 29, 2022 - Jul. 27, 2022	33	24	30	24	7	27	30	47	28
Jul. 27, 2022 - Aug. 31, 2022	16	22	34	26	12	13	23	28	22
Aug. 31, 2022 - Sep. 28, 2022	21	18	23	20	17	28	29	35	24
Sep. 28, 2022 - Nov. 2, 2022	69	682	14	17	4	13	24	15	105
Nov. 2, 2022 - Nov. 30, 2022	19	52	8	7	7	81	22	3	25
Nov. 30, 2022 - Jan. 4, 2023	19	62	42	13	15	43	16	16	28
AVERAGE	25	98	23	23	15	65	23	18	36

Results shaded in blue are <minimum detectable activity (MDA)



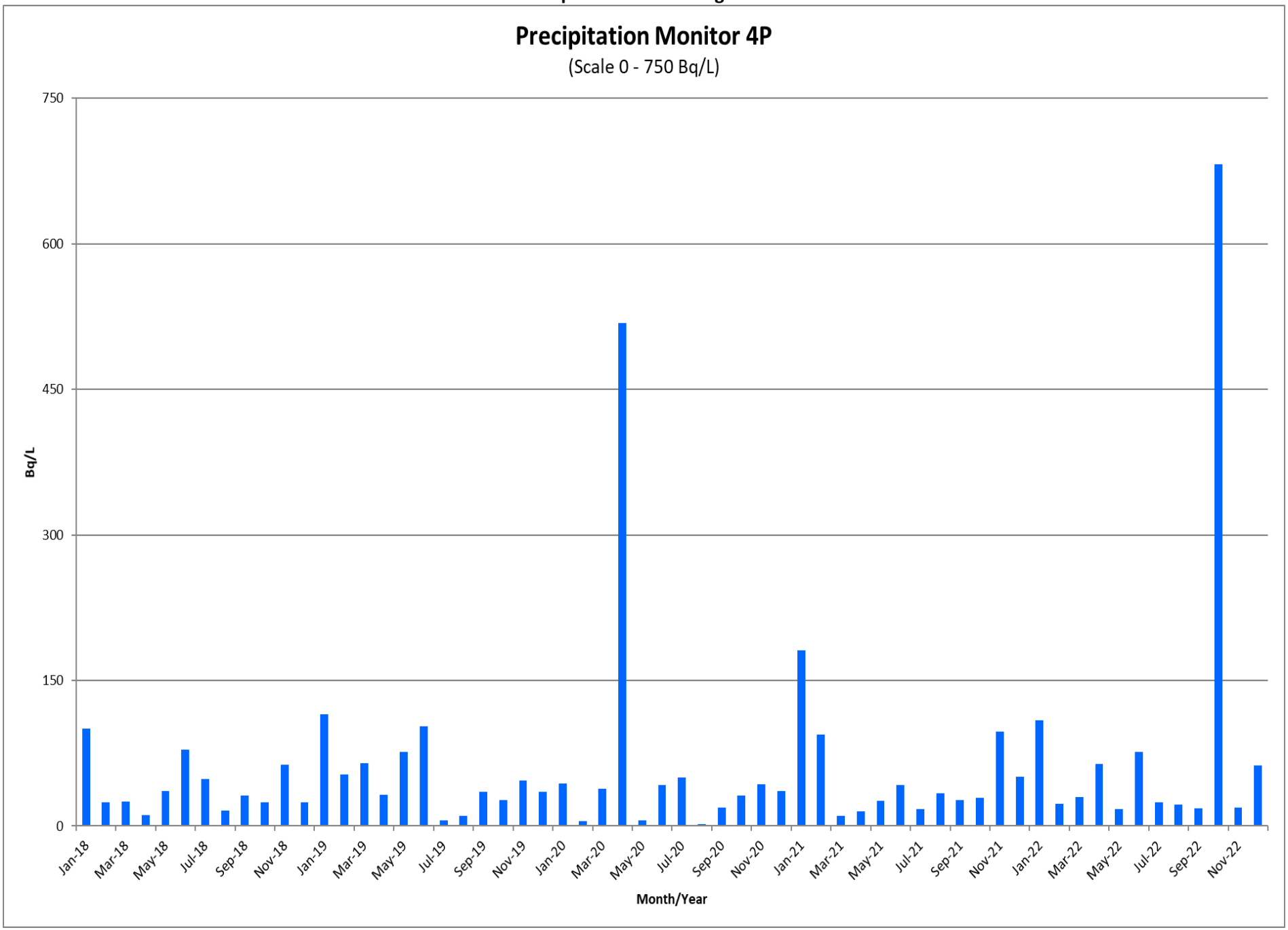
Precipitation Sampling Stations

Precipitation Monitoring Data



APPENDIX H

Precipitation Monitoring Data



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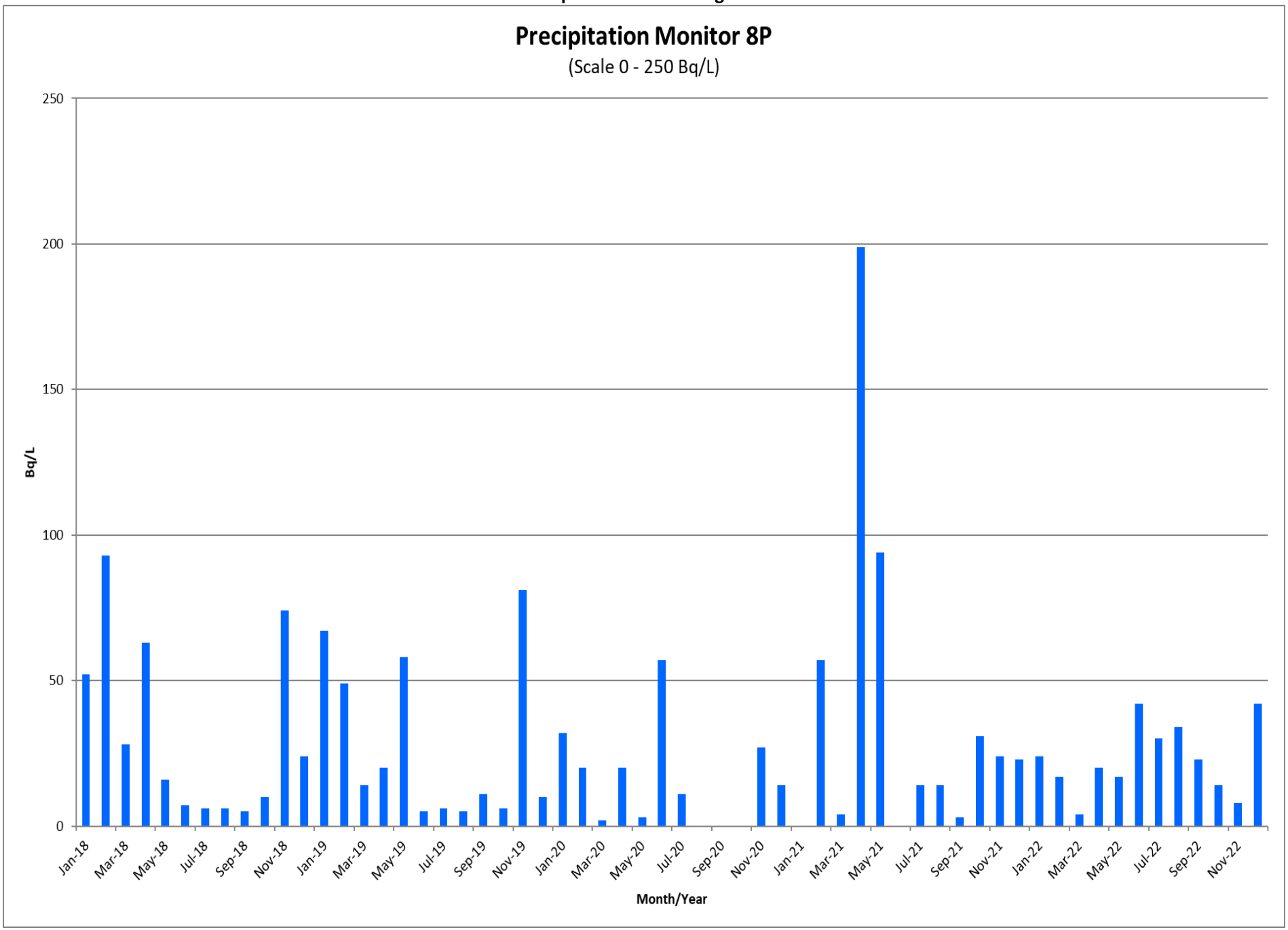
Precipitation Monitoring Data



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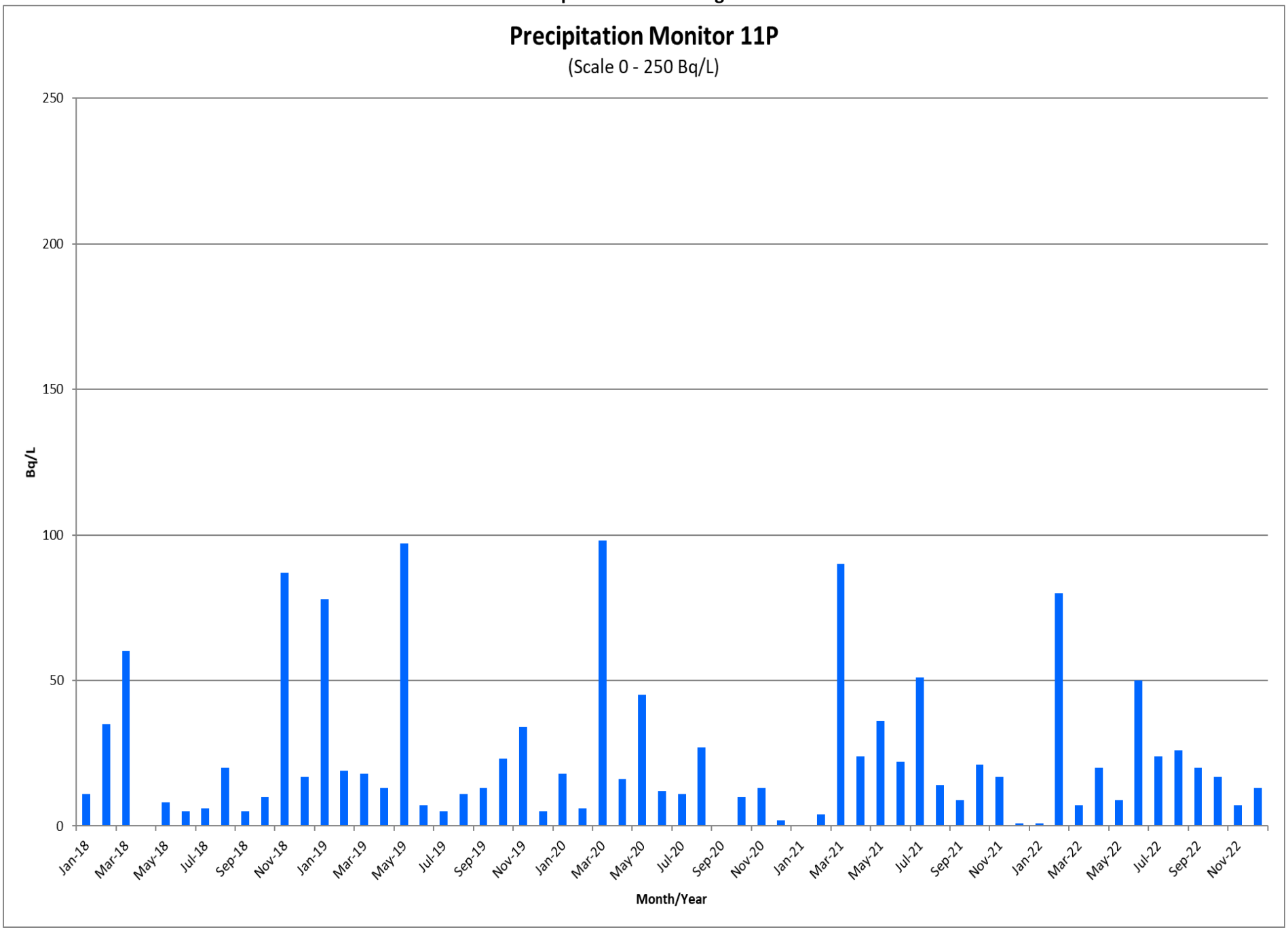
Precipitation Monitoring Data



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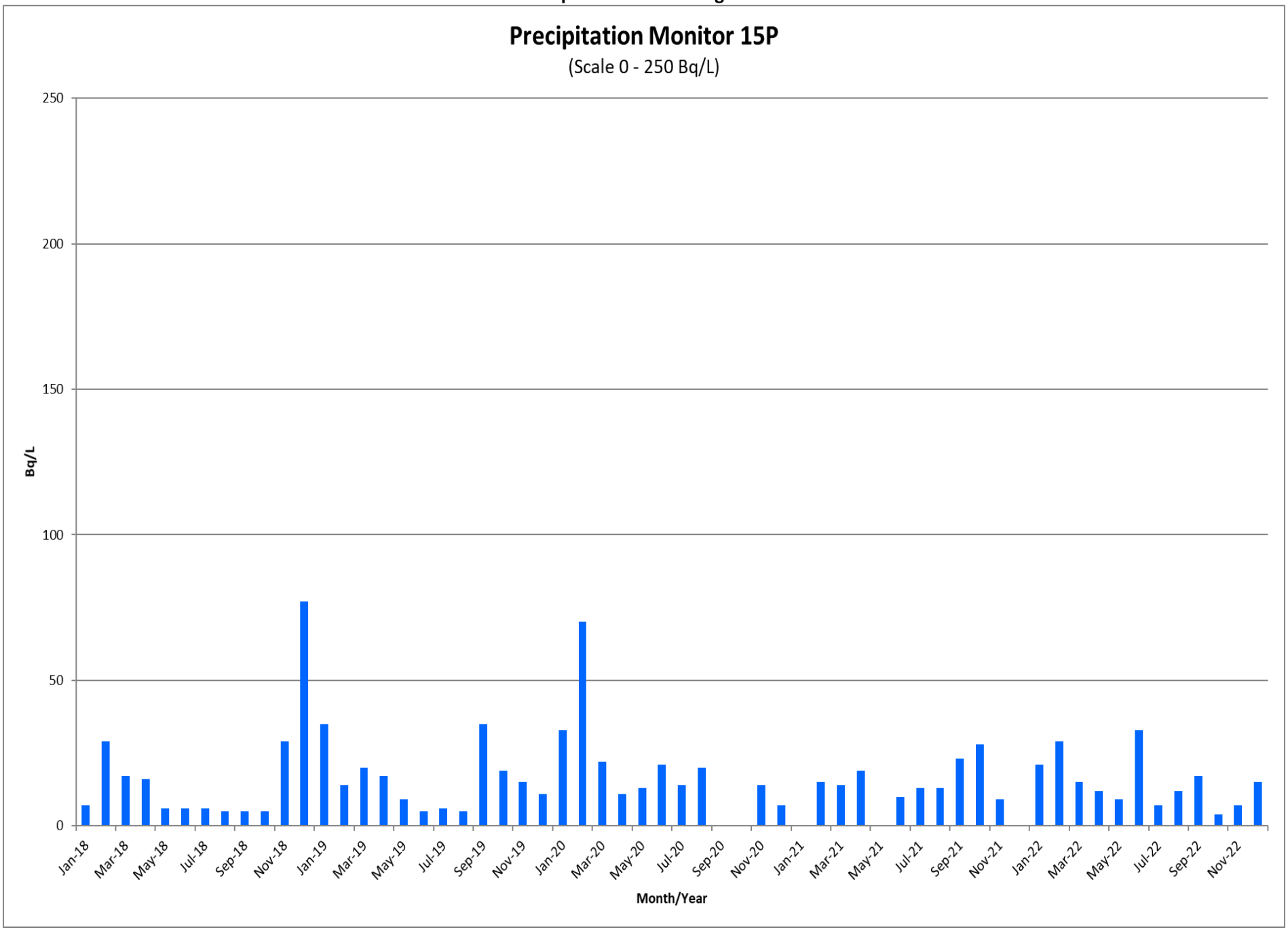
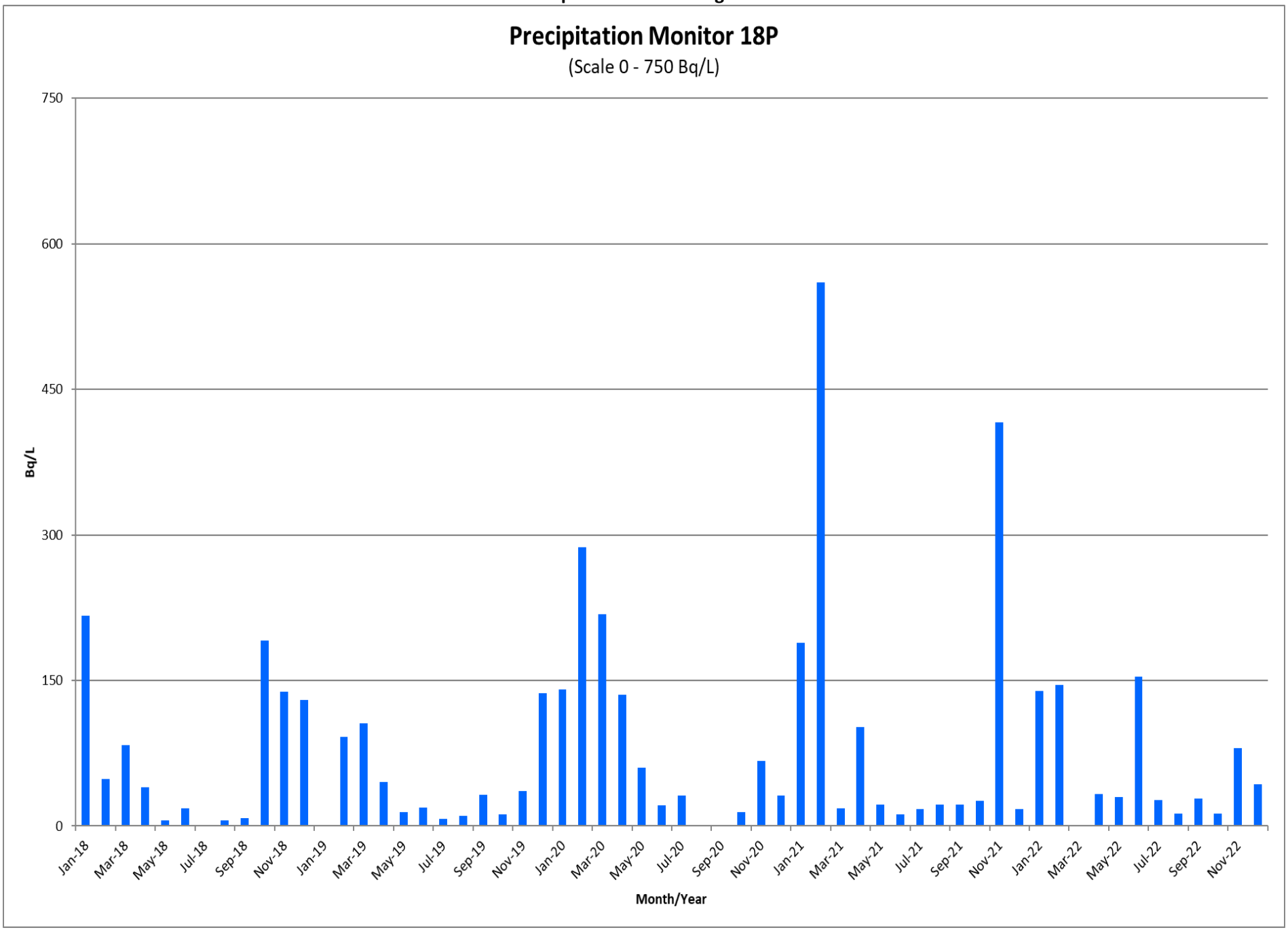
Precipitation Monitoring Data



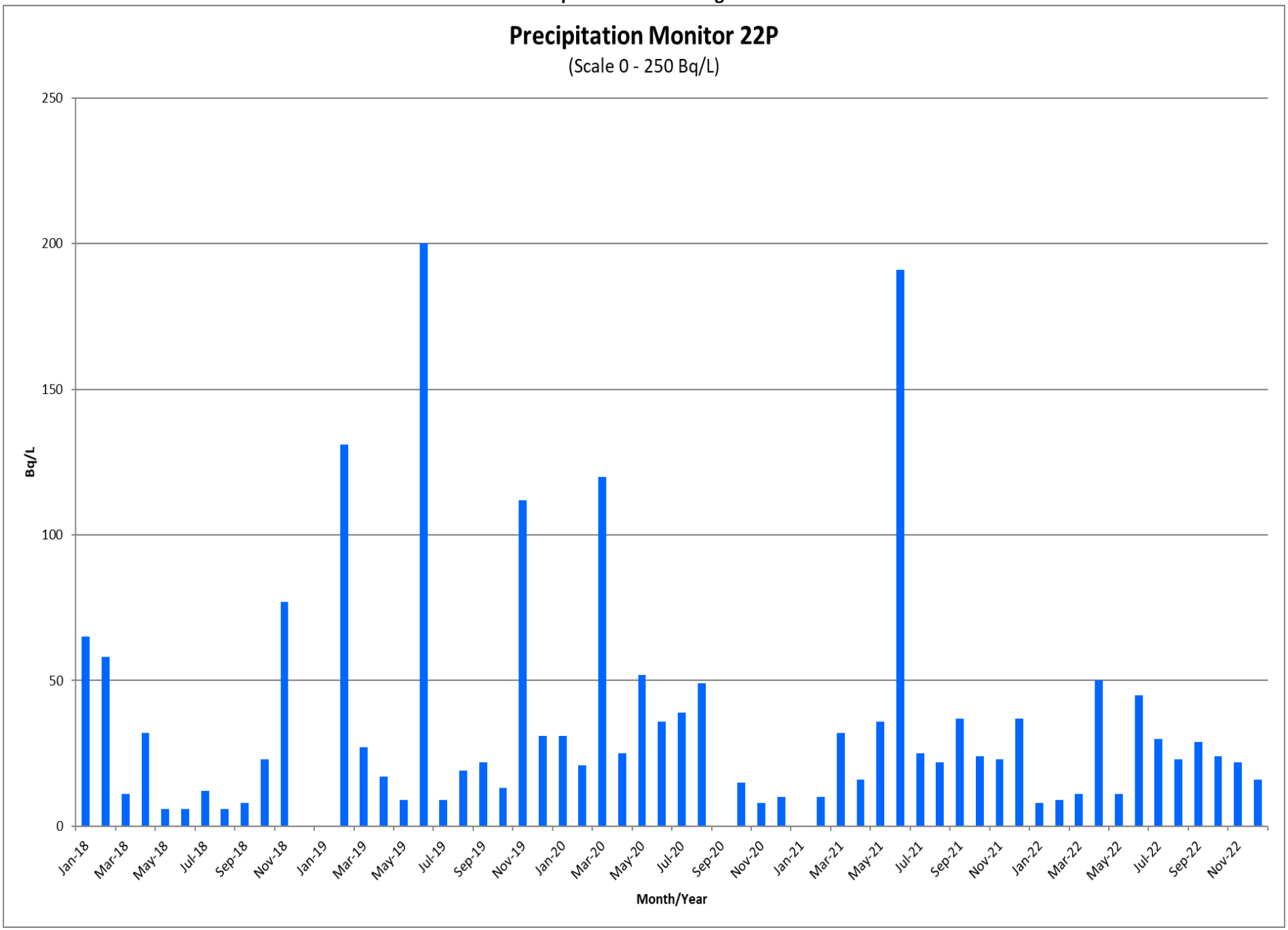
APPENDIX H

Precipitation Monitoring Data



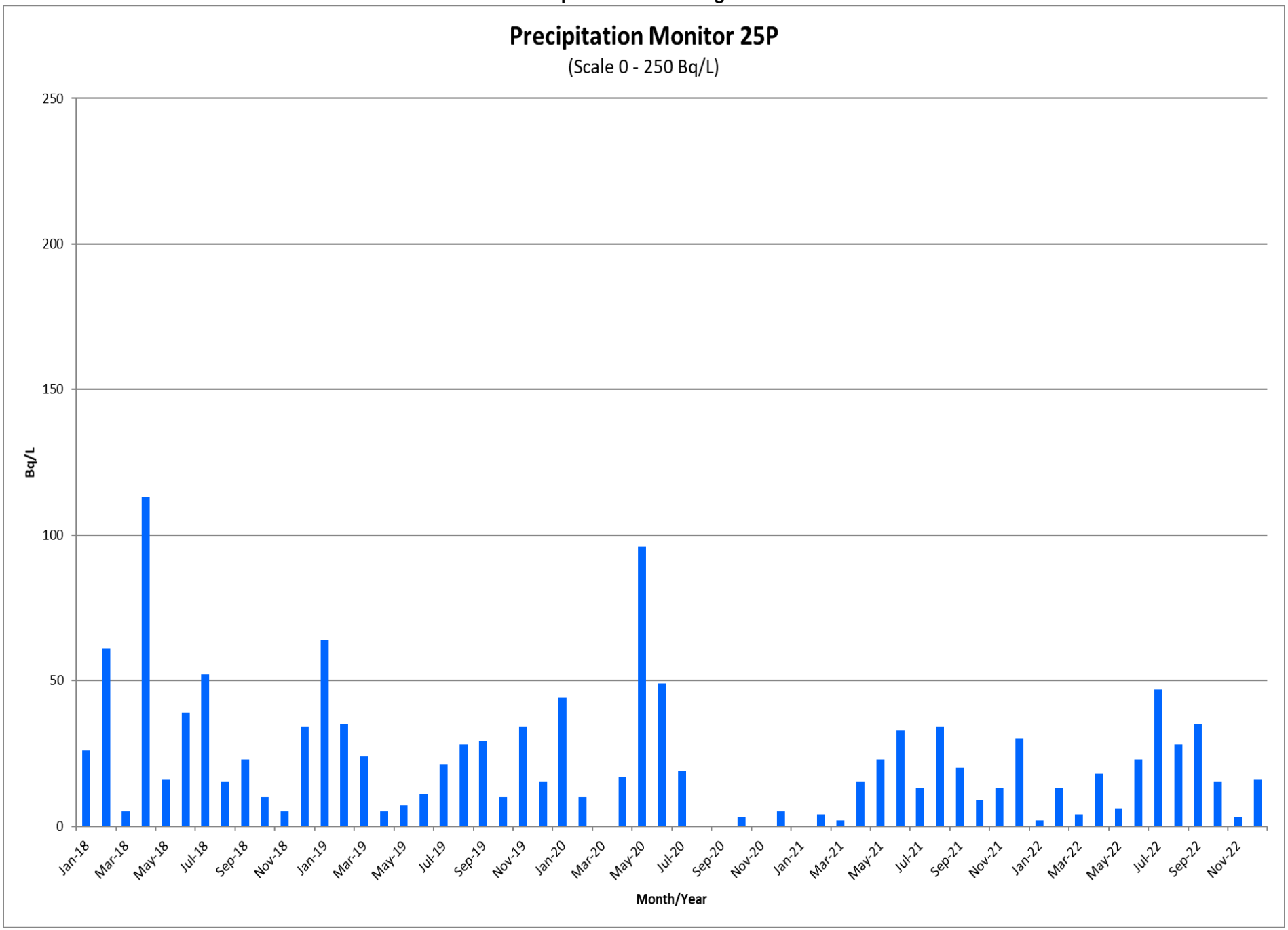
APPENDIX H

Precipitation Monitoring Data



APPENDIX H

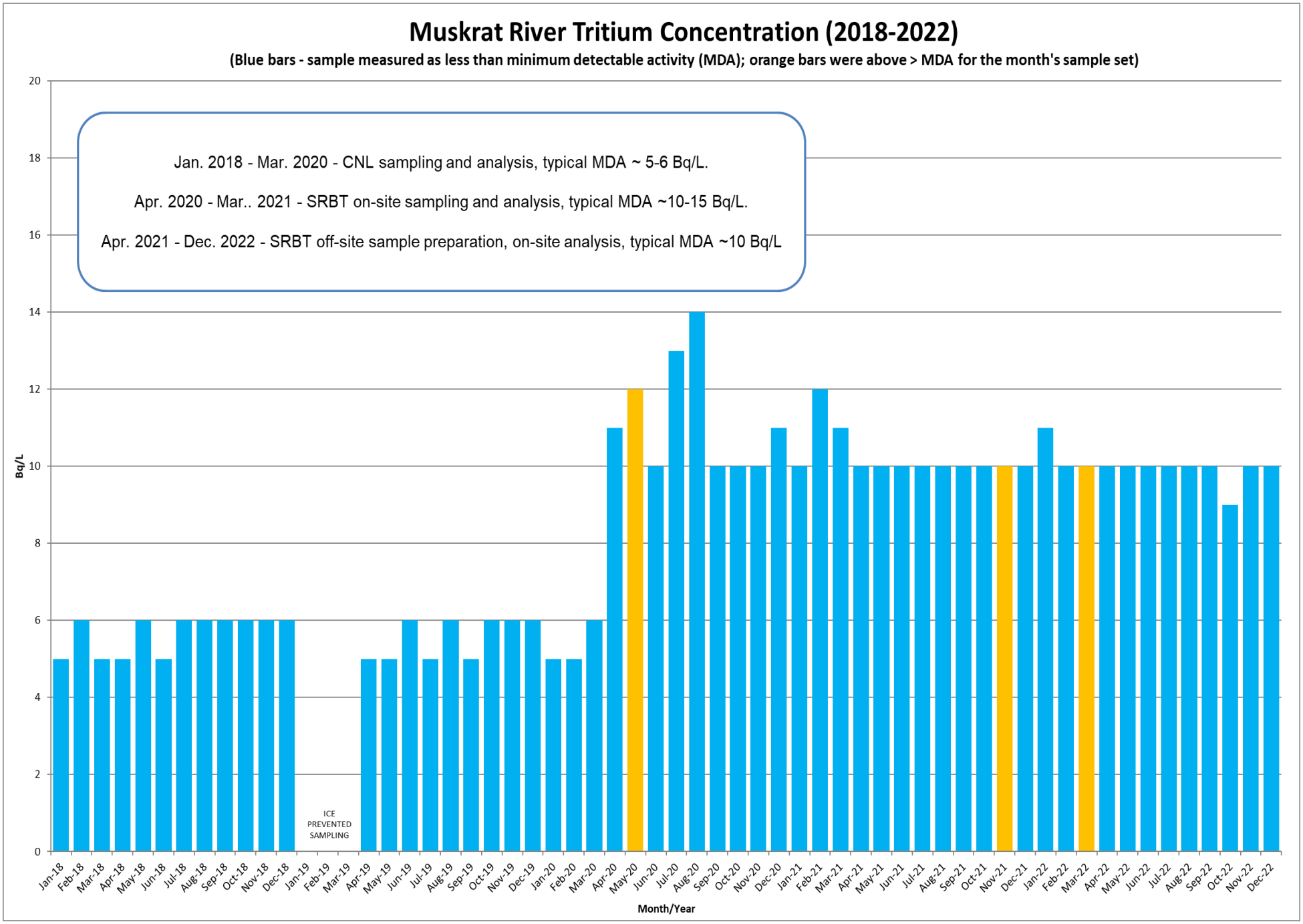
Precipitation Monitoring Data



APPENDIX H

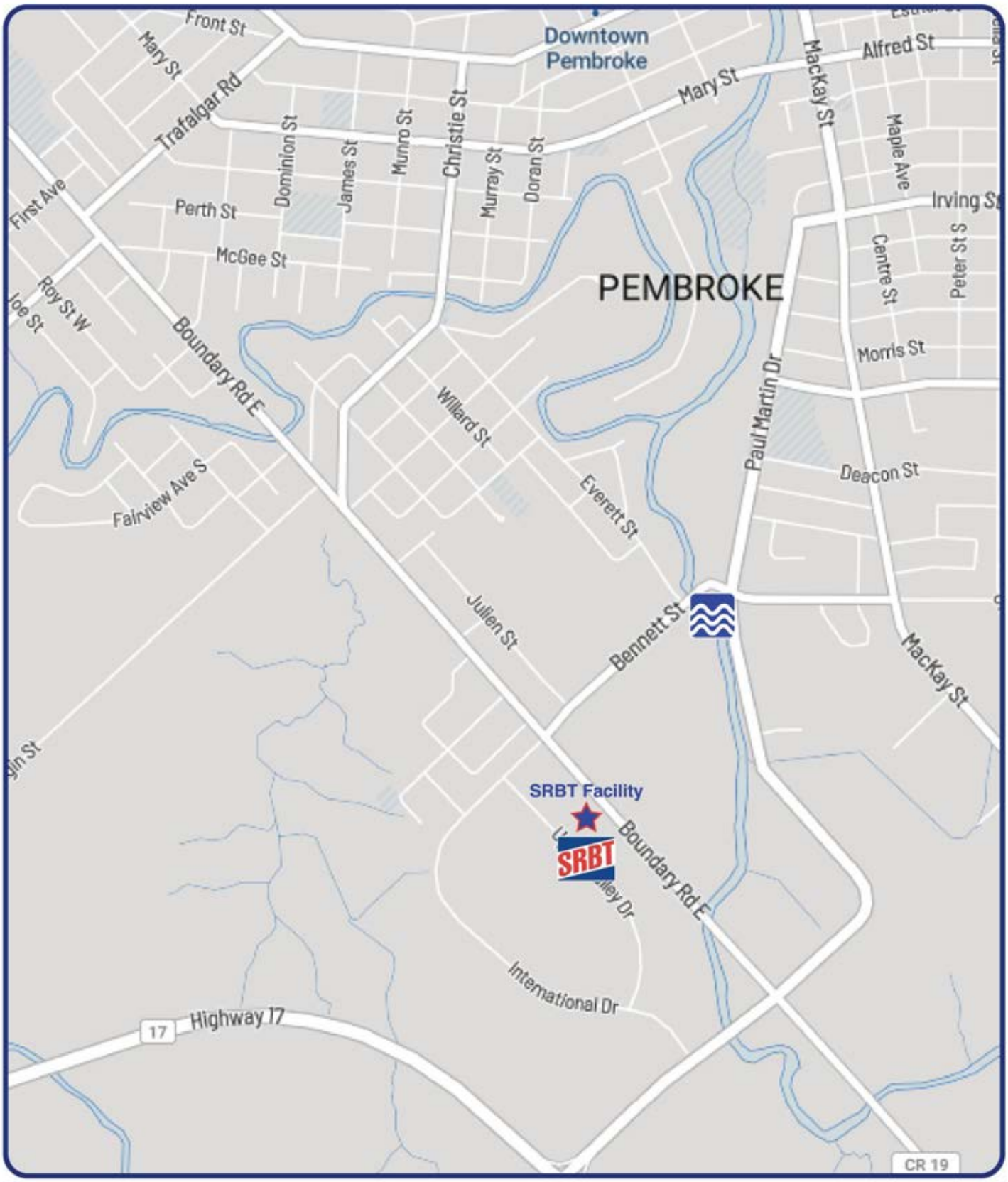
APPENDIX I

River Water Monitoring Data


Muskrat River Tritium Concentration (2018-2022)
(Blue bars - sample measured as less than minimum detectable activity (MDA); orange bars were above > MDA for the month's sample set)
Jan. 2018 - Mar. 2020 - CNL sampling and analysis, typical MDA ~ 5-6 Bq/L.
Apr. 2020 - Mar.. 2021 - SRBT on-site sampling and analysis, typical MDA ~10-15 Bq/L.
Apr. 2021 - Dec. 2022 - SRBT off-site sample preparation, on-site analysis, typical MDA ~10 Bq/L
Bq/L
0
2
4
6
8
10
12
14
16
18
20
ICE PREVENTED SAMPLING
Jan-18 Feb-18 Mar-18 Apr-18 May-18 Jun-18 Jul-18 Aug-18 Sep-18 Oct-18 Nov-18 Dec-18 Jan-19 Feb-19 Mar-19 Apr-19 May-19 Jun-19 Jul-19 Aug-19 Sep-19 Oct-19 Nov-19 Dec-19 Jan-20 Feb-20 Mar-20 Apr-20 May-20 Jun-20 Jul-20 Aug-20 Sep-20 Oct-20 Nov-20 Dec-20 Jan-21 Feb-21 Mar-21 Apr-21 May-21 Jun-21 Jul-21 Aug-21 Sep-21 Oct-21 Nov-21 Dec-21 Jan-22 Feb-22 Mar-22 Apr-22 May-22 Jun-22 Jul-22 Aug-22 Sep-22 Oct-22 Nov-22 Dec-22
Month/Year

APPENDIX I

River Water Monitoring Data



River Water Sampling Point

APPENDIX I

APPENDIX J

Downspout / Facility Runoff Monitoring Data

Downspout / Facility Runoff Monitoring Data

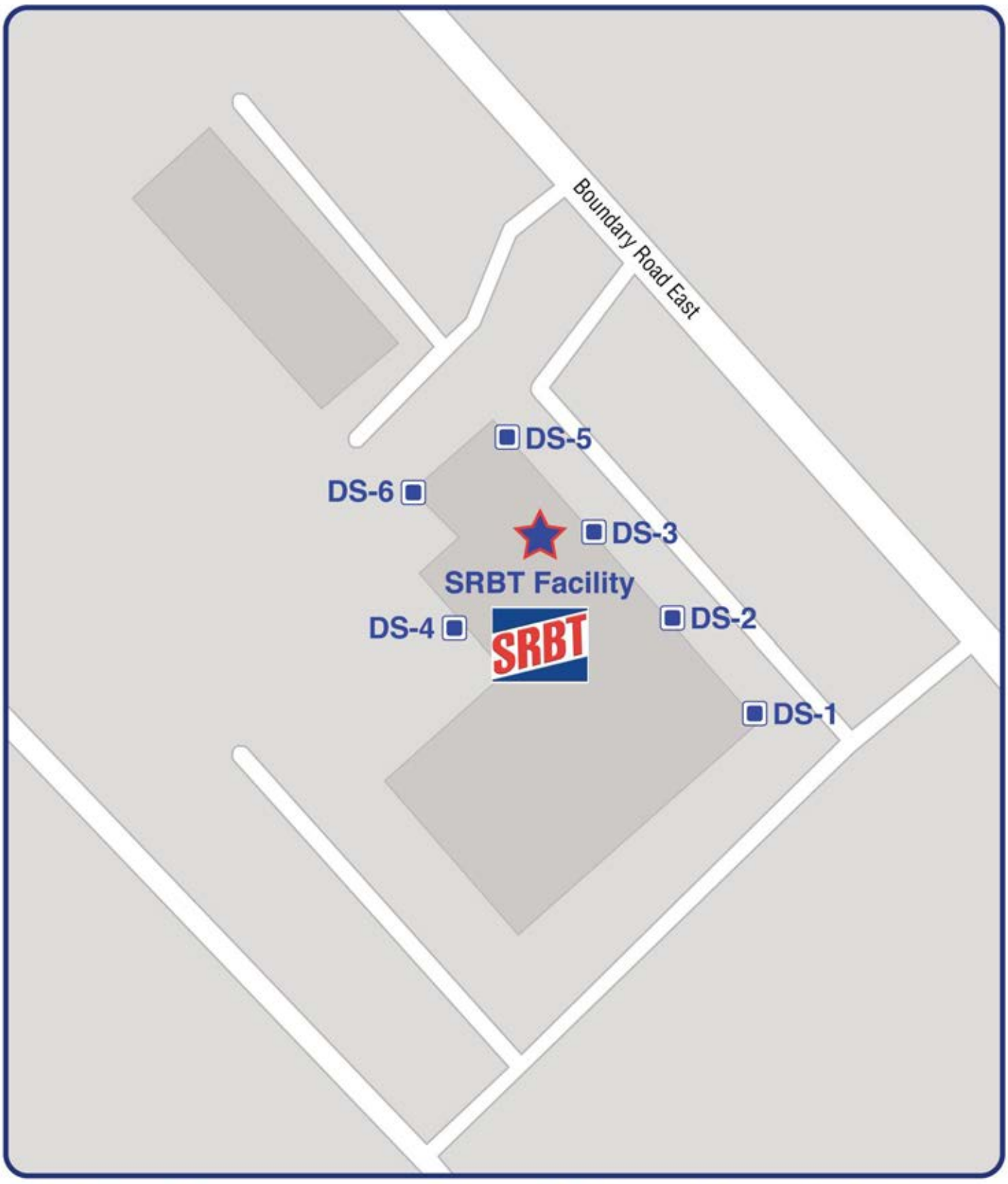
2022 - Tritium Concentration in Facility Downspout / Runoff Water (Bq/L)

Date	Time	DS-1	DS-2	DS-3	DS-4	DS-5	DS-6	MDA
Feb. 16 (snowmelt)	1630h	715	586	270	348	386	1,118	38
	1700h	595	556	237	438	396	1,097	
	1730h	639	524	224	387	401	1,021	
Apr. 25 (rain)	1320h	<MDA	<MDA	<MDA	<MDA	<MDA	<MDA	42
	1620h	<MDA	<MDA	<MDA	349	<MDA	<MDA	
May 27 (rain)	0830h	<MDA	No sample	< MDA	< MDA	< MDA	184	37
	0930h	<MDA	No sample	< MDA	< MDA	< MDA	145	
Aug. 8 (rain)	1245h	< MDA	< MDA	< MDA	< MDA	< MDA	< MDA	35
	1315h	< MDA	< MDA	< MDA	< MDA	< MDA	< MDA	
	1345h	< MDA	< MDA	< MDA	< MDA	< MDA	< MDA	
Nov. 25 (light rain)	0600h	797	68	96	< MDA	< MDA	69	38
Average (Bq/L) (<MDA taken to be 0)		250	158	75	138	108	330	38

Average of all samples obtained (<MDA taken to be 0)	182 Bq/L
Average of all samples obtained (<MDA taken to be MDA value)	205 Bq/L
Average of samples exceeding MDA	466 Bq/L

*MDA = Minimum Detectable Activity

Downspout / Facility Runoff Monitoring Data

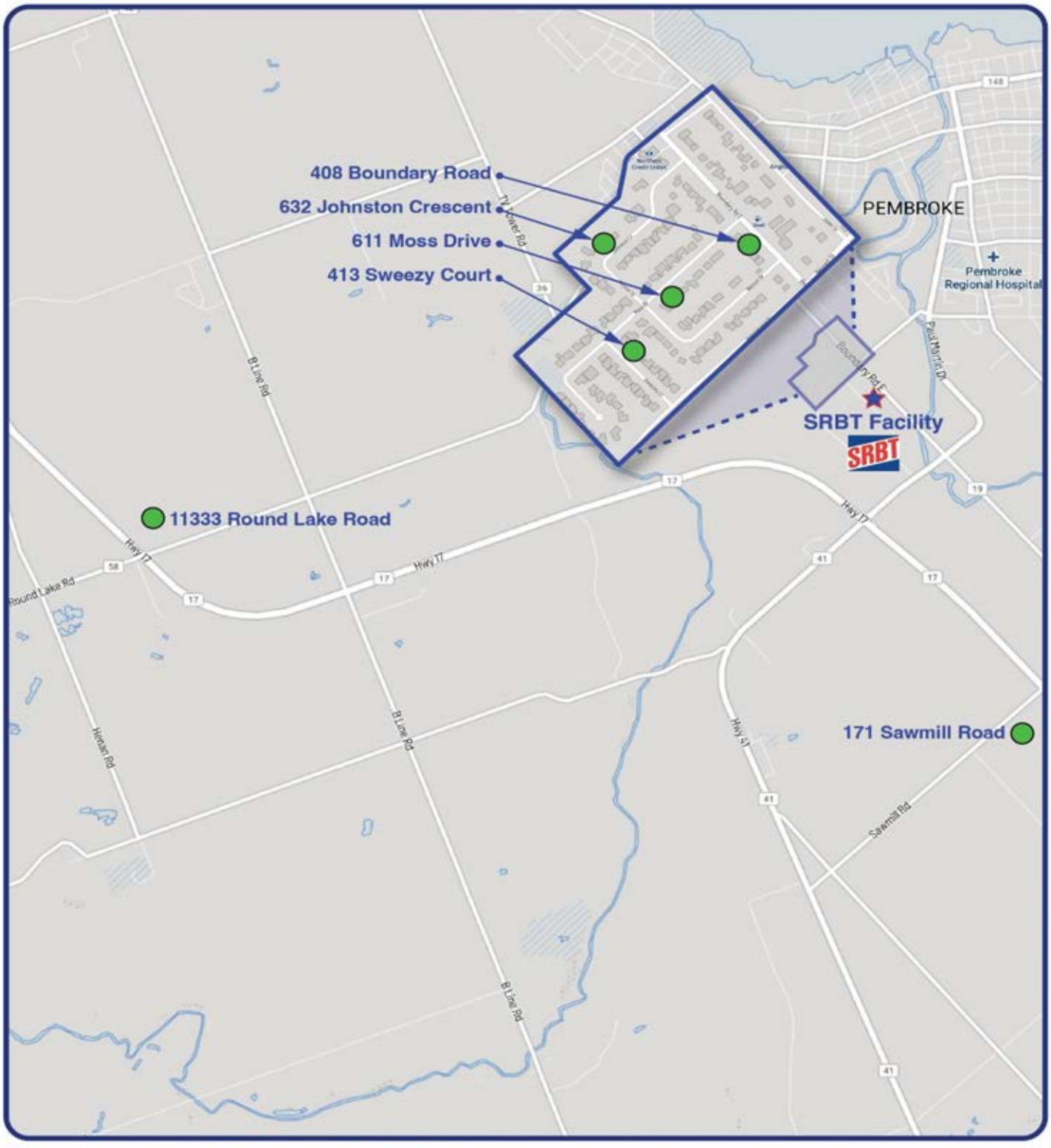


Facility Downspout Runoff Sampling Points ■

APPENDIX K

Produce Monitoring Data

Map – SRBT Produce Sampling 2022



Produce Sample Points ●

Produce Monitoring Data

2022 Residential Produce Sampling – Free-water Tritium Concentration

Sample	Units	Result
Tomatoes 408 Boundary Road	Bq/kg Fresh weight	99
Onions 408 Boundary Road	Bq/kg Fresh weight	44
Apples 413 Sweezey Court	Bq/kg Fresh weight	63
Mixed Herbs 413 Sweezey Court	Bq/kg Fresh weight	21
Tomatoes 611 Moss Drive	Bq/kg Fresh weight	71
Carrot 611 Moss Drive	Bq/kg Fresh weight	36
Beans 171 Sawmill Road	Bq/kg Fresh weight	5
Tomatoes 171 Sawmill Road	Bq/kg Fresh weight	6
Cucumber 171 Sawmill Road	Bq/kg Fresh weight	5
Carrots 171 Sawmill Road	Bq/kg Fresh weight	4
Asparagus 632 Johnston Crescent	Bq/kg Fresh weight	28
Zucchini 632 Johnston Crescent	Bq/kg Fresh weight	30
Tomatoes 632 Johnston Crescent	Bq/kg Fresh weight	43

2022 Residential Produce Sampling – Organically-bound Tritium (OBT) Concentration

Sample	Units	Result
Tomatoes 408 Boundary Road	OBT Bq/kg Fresh weight	6
Apples 413 Sweezey Court	OBT Bq/kg Fresh weight	7

Produce Monitoring Data

2022 Commercial Produce Sampling – Free-water Tritium Concentration

Sample	Units	Result
Tomatoes 11333 Round Lake Road	Bq/kg Fresh weight	3
Cucumbers 11333 Round Lake Road	Bq/kg Fresh weight	3
Corn 11333 Round Lake Road	Bq/kg Fresh weight	3
Onions 11333 Round Lake Road	Bq/kg Fresh weight	3
Beets 11333 Round Lake Road	Bq/kg Fresh weight	3

2022 Commercial Produce Sampling – Organically-bound Tritium (OBT) Concentration

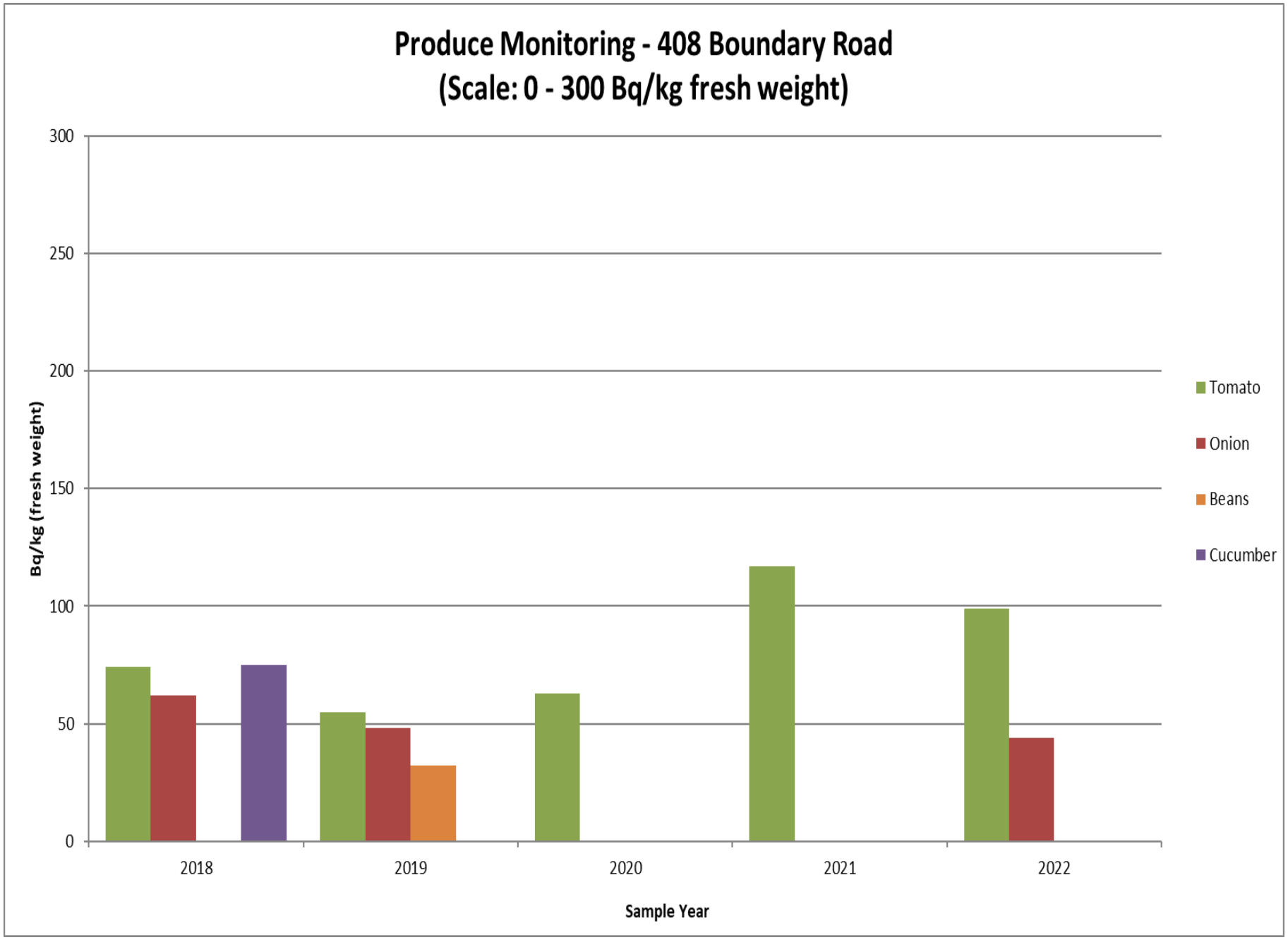
Sample	Units	Result
Tomato 11333 Round Lake Road	OBT Bq/kg Fresh weight	2

Produce Sampling Data Trends

2018-2022

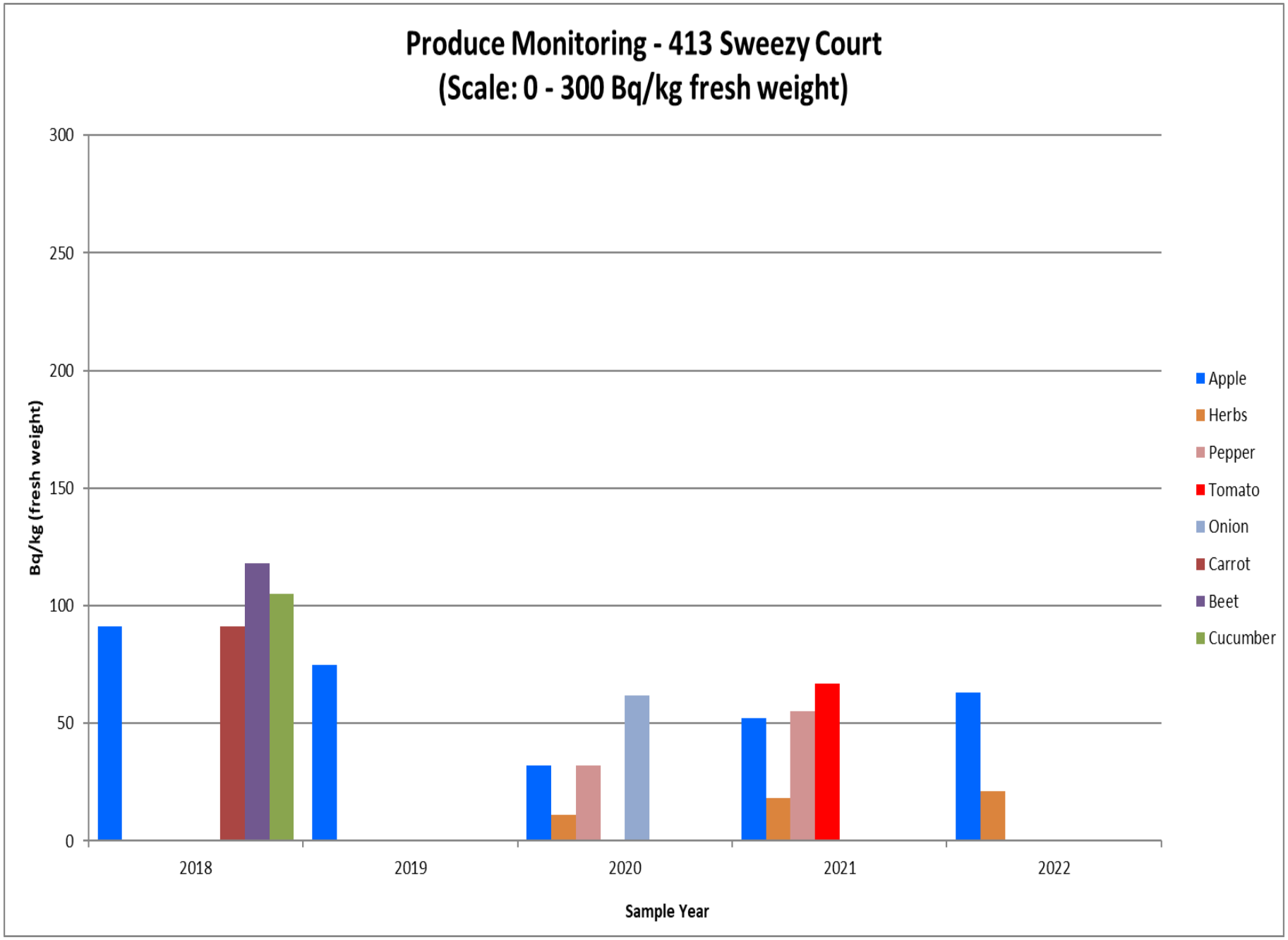
APPENDIX K

Produce Monitoring Data



APPENDIX K

Produce Monitoring Data



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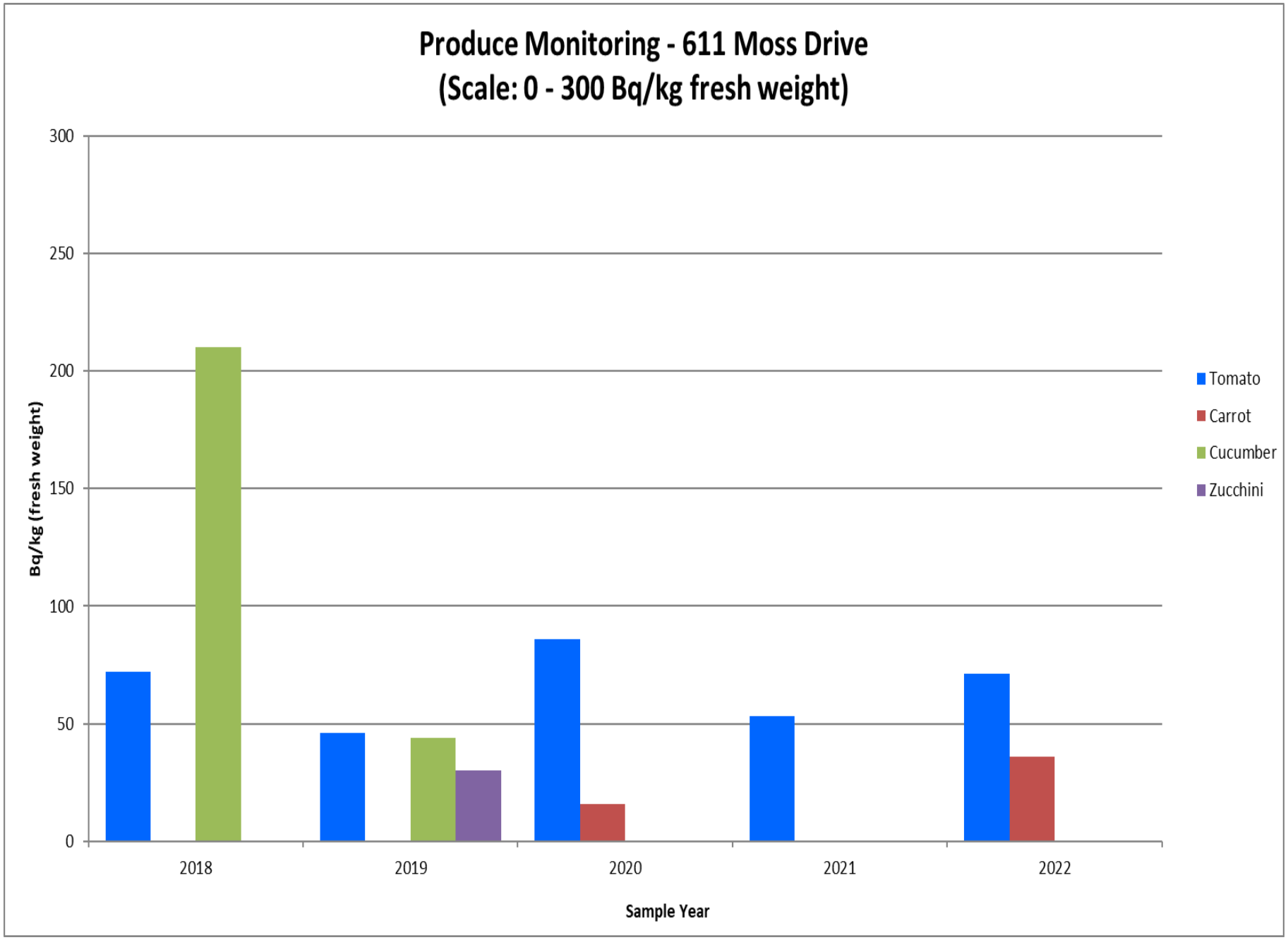
Produce Monitoring Data



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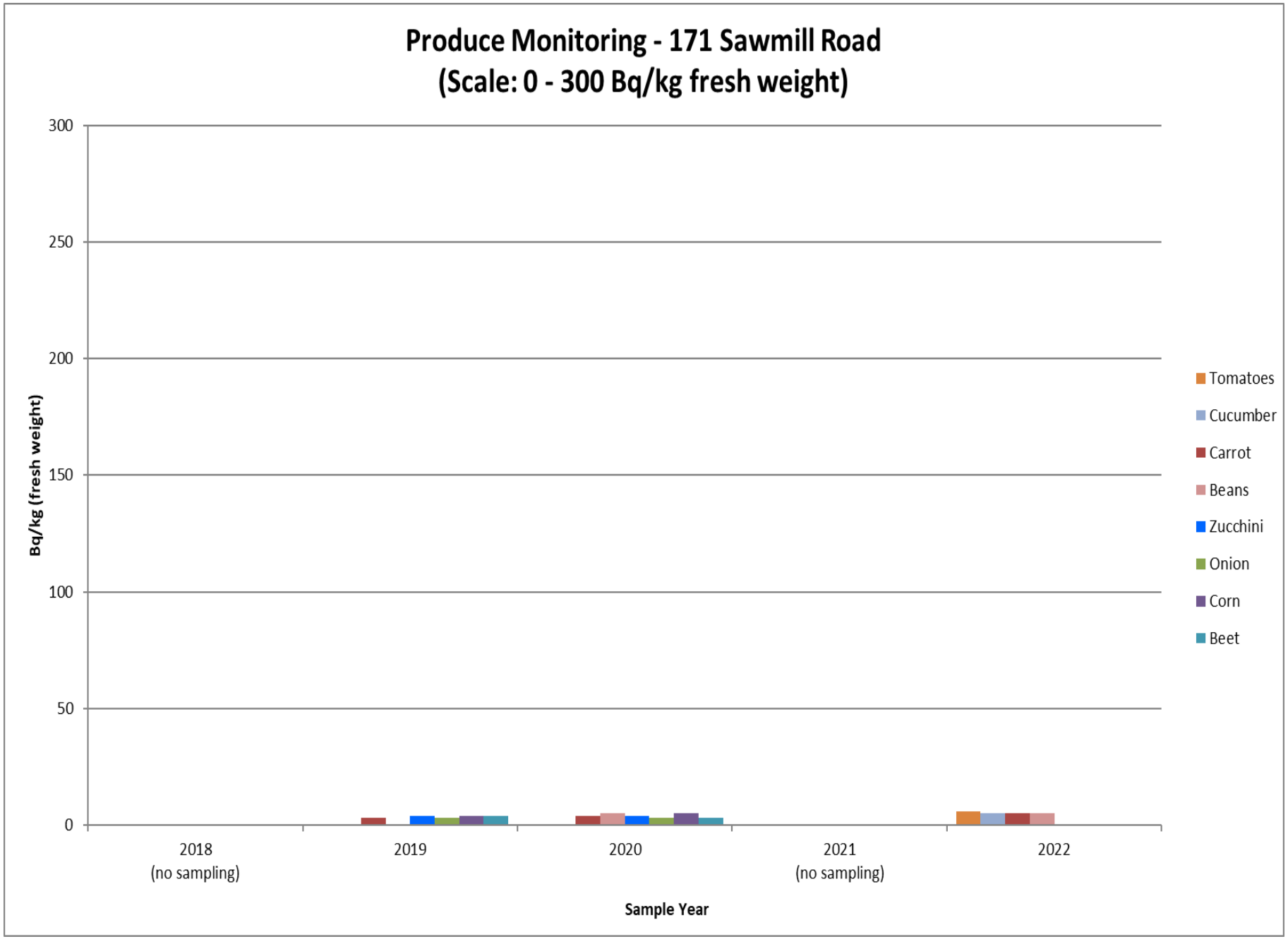
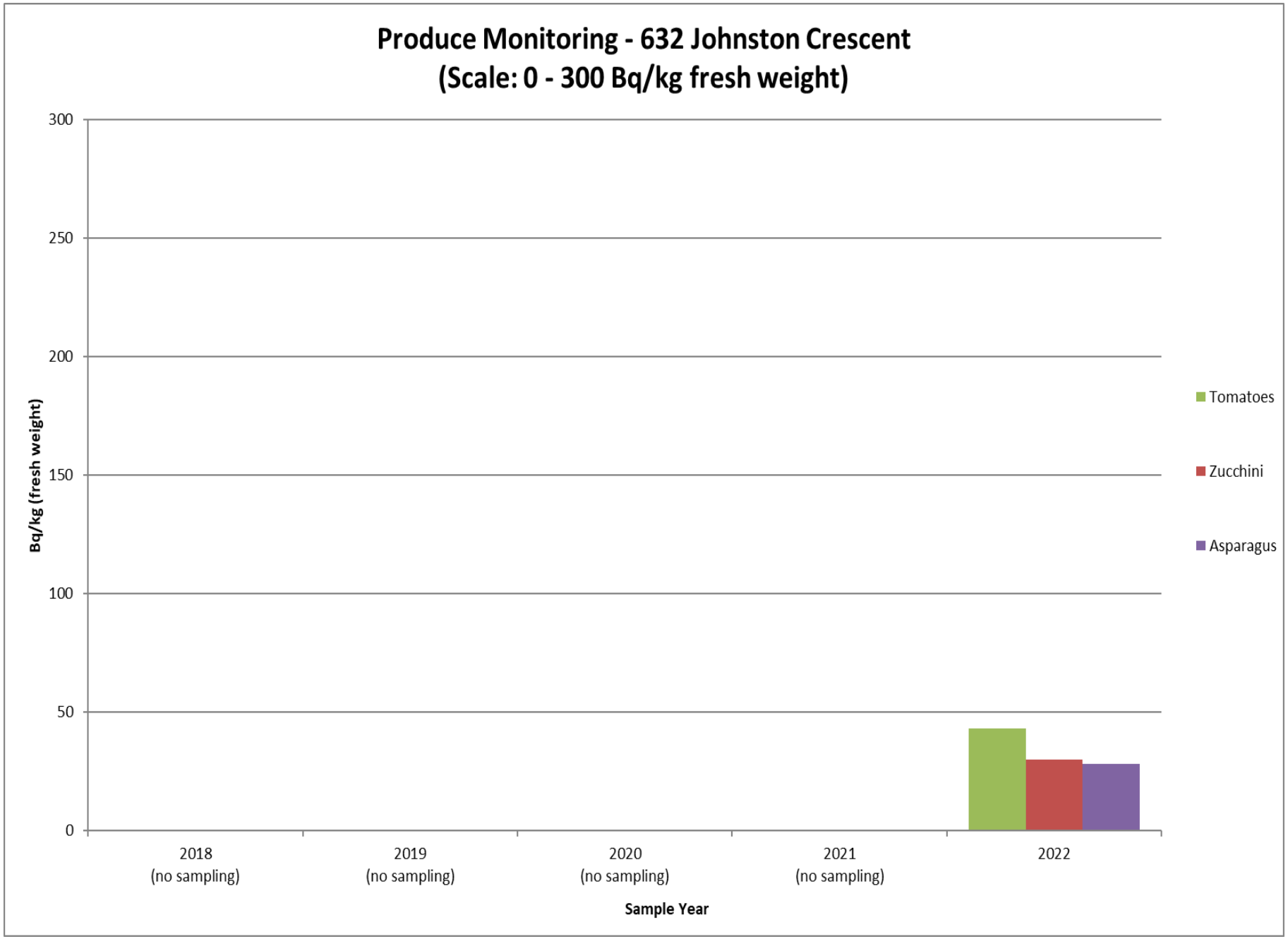
Produce Monitoring Data



APPENDIX K

Produce Monitoring Data



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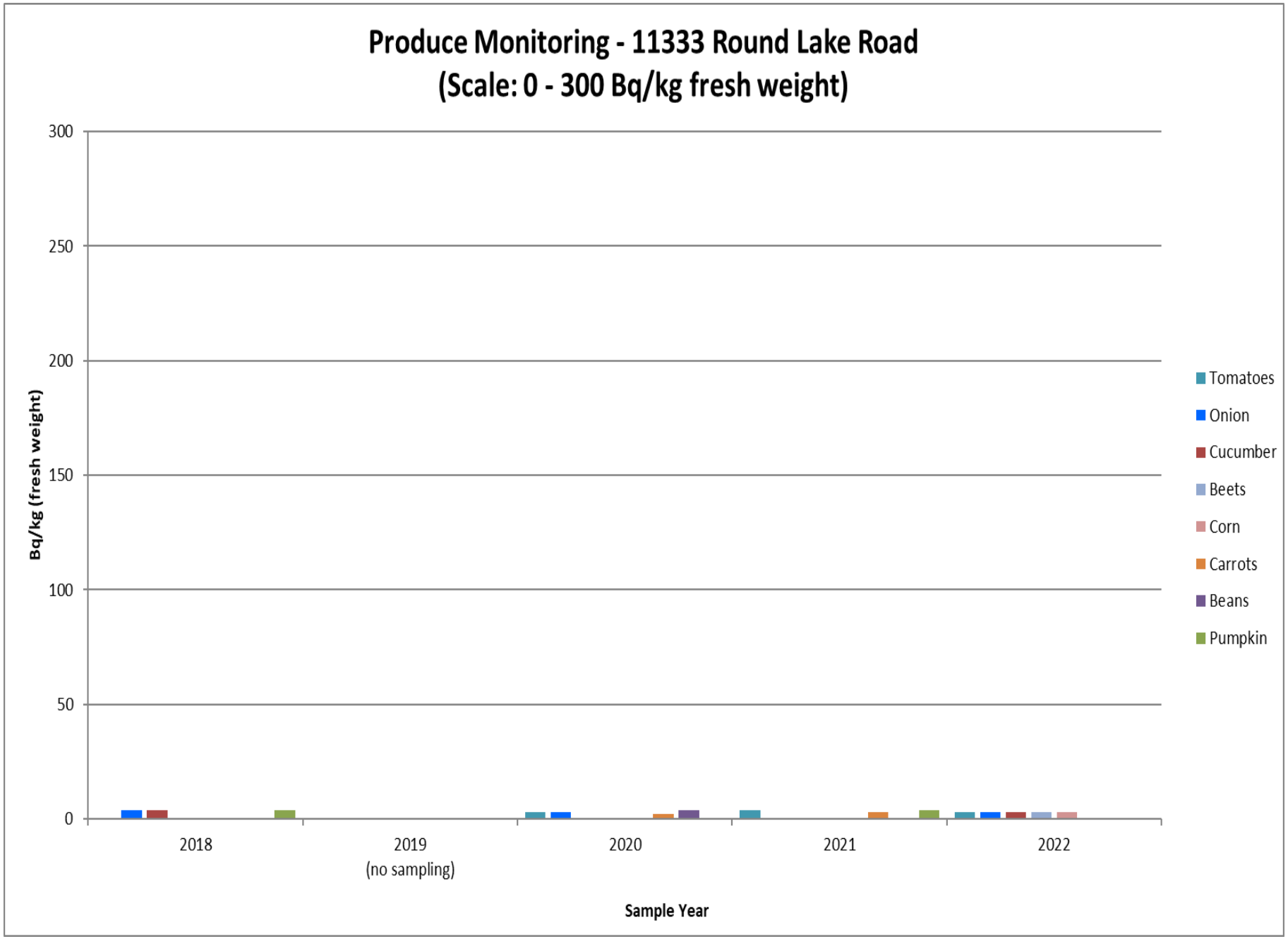
Produce Monitoring Data



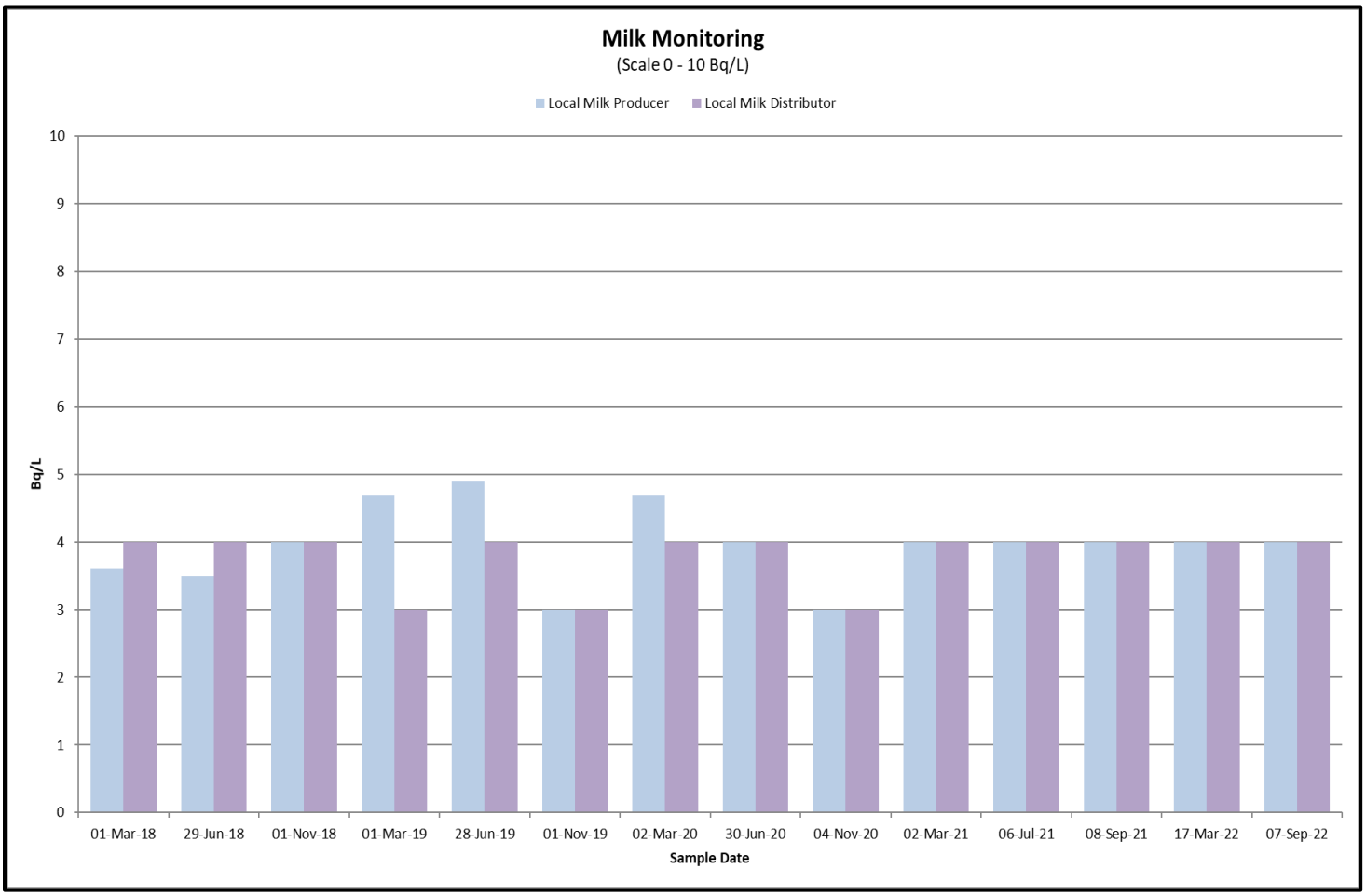
APPENDIX K

APPENDIX L

Milk Monitoring Data

Milk Monitoring Data

MILK MONITORING		
Results shaded in blue are <MDA (minimum detectable activity)		
	LOCAL MILK PRODUCER	LOCAL MILK DISTRIBUTOR
	Bq/L	Bq/L
01-Mar-18	3.6	4
29-Jun-18	3.5	4
01-Nov-18	4	4
01-Mar-19	4.7	3
28-Jun-19	4.9	4
01-Nov-19	3	3
02-Mar-20	4.7	4
30-Jun-20	4	4
04-Nov-20	3	3
02-Mar-21	4	4
06-Jul-21	4	4
08-Sep-21	4	4
17-Mar-22	4	4
07-Sep-22	4	4



APPENDIX M

Weather Data

WEATHER DATA SUMMARY (2018-2022)

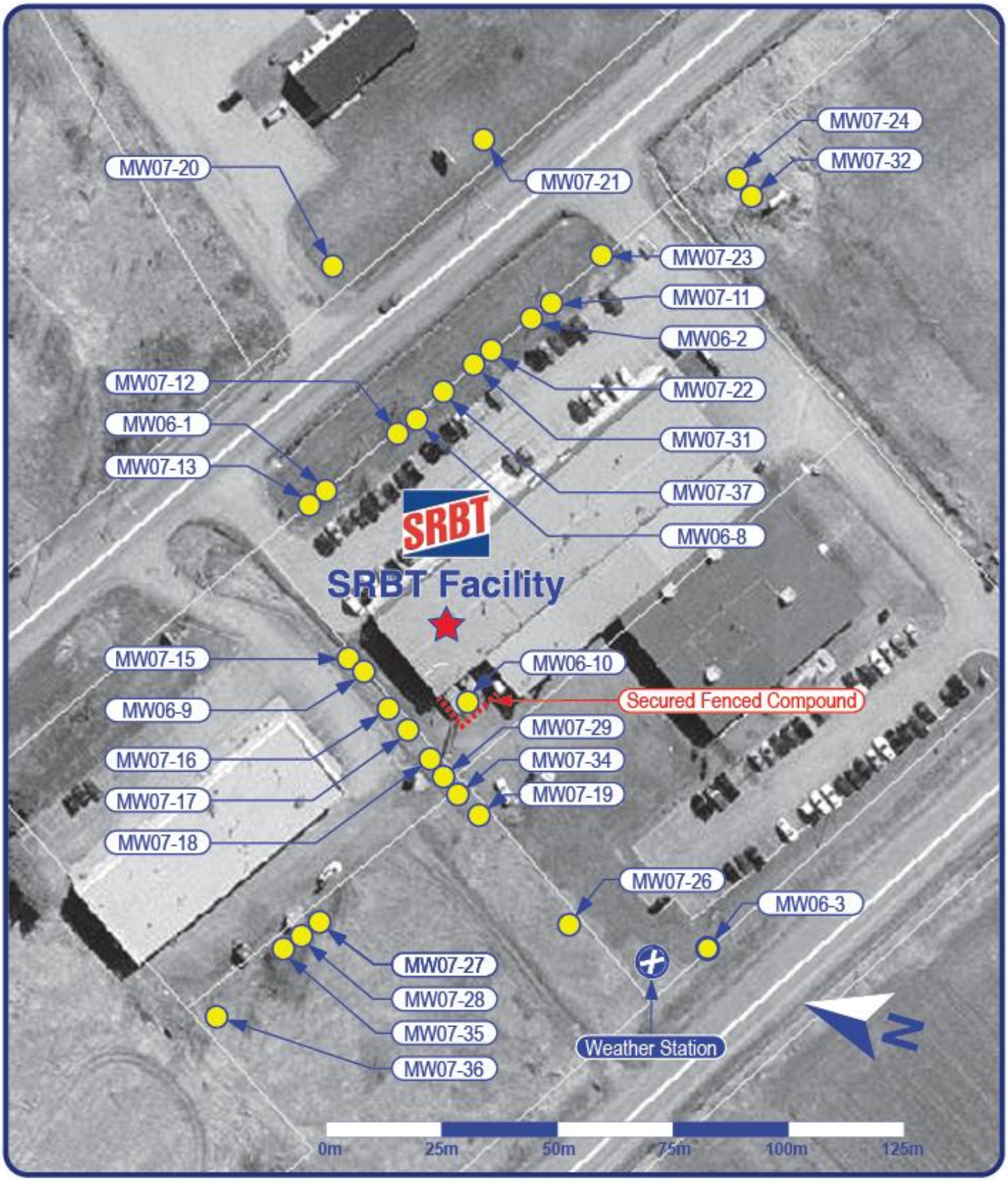
Month	Precip Counts, # (TOTAL)	Wind Speed, m/s (AVG)	Gust Speed, m/s (AVG)	Wind Direction, ø (AVG)	Temp, °C (AVG)	RH, % (AVG)	DewPt, °C (AVG)	Wind sector (nesw)	Total rain (mm)
January-2018	167	3.3	4.9	146.0	-9.7	80.2	-12.6	SE	33
February-2018	169	3.3	3.7	154.8	-5.6	77.9	-9.1	SSE	34
March-2018	158	3.9	5.1	94.1	-2.3	68.6	-7.7	ESE	32
April-2018	348	2.8	4.2	146.6	3.5	66.5	-3.1	SE	70
May-2018	276	2.4	3.9	202.6	15.1	60.7	6.4	SSW	55
June-2018	273	2.1	3.4	221.4	17.2	70.1	11.0	SW	55
July-2018	340	2.1	3.3	250.8	22.4	69.7	15.9	WSW	68
August-2018	336	1.8	2.9	213.2	21.0	78.7	16.8	SW	67
September-2018	352	2.1	3.3	205.2	14.5	81.1	11.1	SSW	70
October-2018	234	2.8	4.3	213.7	6.0	79.0	2.4	SW	47
November-2018	352	2.9	4.3	204.3	-2.3	85.6	-4.4	SSW	70
December-2018	170	2.3	3.4	195.0	-8.0	85.6	-10.0	SSW	34
January-2019	767	2.7	4.0	215.7	-13.0	79.2	-15.9	SW	153
February-2019	116	2.6	3.9	196.8	-9.7	74.9	-13.5	SSW	23
March-2019	178	3.0	4.5	231.7	-3.6	68.1	-9.2	SW	36
April-2019	778	3.0	4.5	204.9	4.1	73.3	-0.8	SSW	156
May-2019	369	2.6	4.0	212.2	10.8	72.9	5.6	SW	74
June-2019	493	2.3	3.7	248.4	16.8	70.5	10.7	WSW	99
July-2019	321	1.9	3.1	264.1	21.9	71.2	15.9	WSW	64
August-2019	285	2.0	3.2	239.8	19.4	71.7	13.6	SW	57
September-2019	228	2.1	3.3	246.7	14.6	78.8	10.6	WSW	46
October-2019	690	2.4	3.7	246.2	7.8	80.9	4.5	WSW	138
November-2019	219	2.1	3.3	249.3	14.8	78.9	10.8	WSW	44
December-2019	190	1.7	2.8	237.0	-5.0	84.7	-7.2	SW	38
January-2020	246	1.6	2.7	245.3	-7.4	84.1	-9.7	WSW	49
February-2020	165	1.9	3.4	251.2	-7.4	73.2	-11.6	WSW	33
March-2020	374	1.8	3.2	232.0	0.2	71.3	-4.9	SW	75
April-2020	261	2.0	3.8	Wind Measurement Malfunction	4.6	61.4	-3.1	Wind Measurement Malfunction	52
May-2020	375	1.2	2.8		12.1	59.4	3.2		75
June-2020	297	1.3	2.7		19.0	70.2	12.9		59
July-2020	358	1.0	2.2		23.2	72.5	17.4		72
August-2020	1131	0.6	1.3		18.6	82.1	15.1		226
September-2020	344	-6.9	-6.7		13.5	79.3	9.7		69
October-2020	296	0.0	0.2		5.9	78.1	2.2		59
November-2020	259	0.0	1.5		3.7	78.7	-0.9		52
December-2020	192	0.0	1.1		-4.6	84.9	-6.8		38
January-2021	66	0.1	0.9		-7.2	83.1	-9.6		13
February-2021	121	0.3	1.2		-8.1	75.6	-11.8		24
March-2021	Weather Station taken offline for investigation, corrective maintenance and component replacement.								
April-2021									
May-2021									
June-2021									
July-2021									
August-2021									
September-2021									
October-2021	271	2.7	4.2	201.9	10.9	83.8	8.1	SSW	54
November-2021	102	3.1	4.7	225.2	0.9	79.4	-2.5	SW	20
December-2021	253	4.0	6.1	209.2	-4.5	79.4	-7.6	SSW	51
January-2022	80	3.4	5.0	223.1	-13.8	77.7	-17.0	SW	16
February-2022	36	3.5	5.3	222.7	-13.6	78.4	-16.6	SW	7
March-2022	198	3.8	5.8	186.9	-1.1	72.0	-5.8	SSW	40
April-2022	401	4.3	6.6	192.0	6.2	66.3	-0.5	SSW	80
May-2022	116	3.5	5.5	48.9	17.7	75.1	12.7	NE	23
June-2022	100	3.2	5.1	151.8	16.0	63.0	7.6	SSE	20
July-2022	Precipitation counting malfunction	2.8	4.8	153.6	20.6	71.0	14.7	SSE	Precipitation counting malfunction
August-2022		2.6	4.3	214.0	19.9	77.4	15.4	SW	
September-2022		2.7	4.4	210.6	14.8	83.6	11.8	SSW	
October-2022		2.6	4.1	189.7	8.6	79.5	4.9	SSW	
November-2022		3.9	6.0	218.9	3.0	73.2	-1.7	SW	
December-2022	359	3.4	5.1	200.2	-2.4	84.2	-4.8	SSW	72

APPENDIX N

Groundwater Monitoring Data

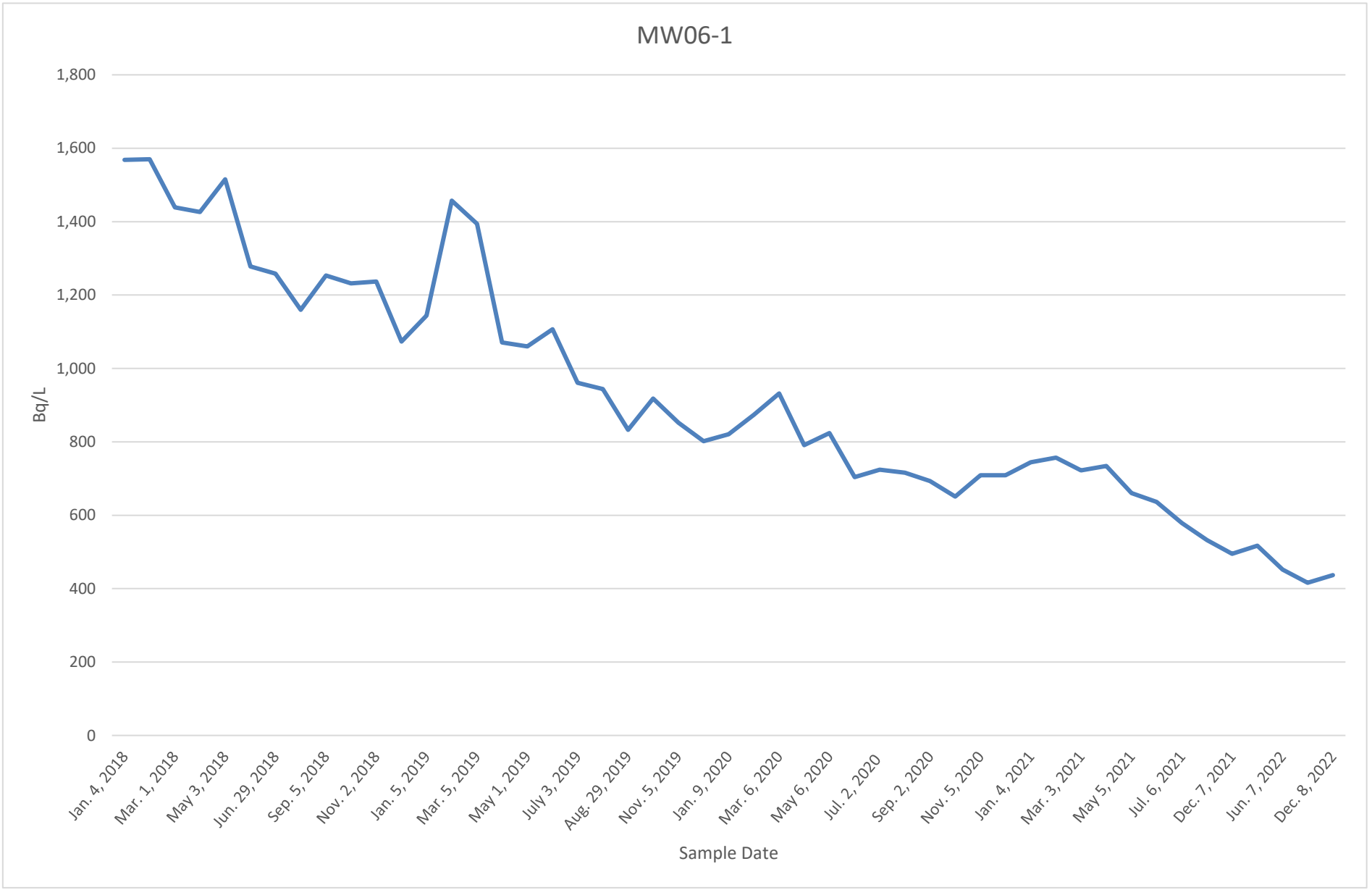
Well I.D.	Description (location, profile)		Distance from Stacks (m)	2022-03-09 (Bq/L)	2022-06-07 (Bq/L)	2022-09-07 (Bq/L)	2022-12-08 (Bq/L)	2022 Avg. (Bq/L)
Engineered Sampling Wells								
MW06-1	SRB SITE	IN SOIL	50	517	452	416	437	**456**
MW06-2	SRB SITE	IN SOIL	75	737	580	553	566	**609**
MW06-3	SRB SITE	IN SOIL	50	*No Sample*	163	169	165	**166**
MW06-8	SRB SITE	IN SOIL	55	523	501	499	504	**507**
MW06-9	SRB SITE	IN SOIL	25	1,272	1,123	1,028	1,085	**1,127**
MW06-10	SRB SITE	SURFACE OF BEDROCK	0	31,747	23,932	25,542	23,431	**26,163**
MW07-11	SRB SITE	SURFACE OF BEDROCK	75	939	647	835	824	**811**
MW07-12	SRB SITE	SURFACE OF BEDROCK	55	398	415	425	426	**416**
MW07-13	SRB SITE	SURFACE OF BEDROCK	50	2,859	2,616	2,461	2,359	**2,574**
MW07-15	SRB SITE	SURFACE OF BEDROCK	25	1,103	920	1,020	974	**1,004**
MW07-16	SRB SITE	SURFACE OF BEDROCK	15	736	690	685	629	**685**
MW07-17	SRB SITE	DEEPER BEDROCK	15	329	278	221	238	**267**
MW07-18	SRB SITE	SURFACE OF BEDROCK	10	1,125	710	790	743	**842**
MW07-19	SRB SITE	SURFACE OF BEDROCK	20	675	632	727	625	**665**
MW07-20	SUPERIOR PROPANE PROPERTY	SURFACE OF BEDROCK	90	237	251	240	248	**244**
MW07-21	SUPERIOR PROPANE PROPERTY	SURFACE OF BEDROCK	110	406	207	403	388	**351**
MW07-22	SRB SITE	SURFACE OF BEDROCK	70	648	622	688	599	**639**
MW07-23	SRB SITE	SURFACE OF BEDROCK	90	1,070	982	1,017	982	**1,013**
MW07-24	HARRINGTON PROPERTY	SURFACE OF BEDROCK	115	1,405	1,344	1,319	1,290	**1,340**
MW07-26	SRB SITE	SURFACE OF BEDROCK	50	297	260	320	285	**291**
MW07-27	CITY PROPERTY	SURFACE OF BEDROCK	55	1,884	1,026	1,538	1,308	**1,439**
MW07-28	CITY PROPERTY	DEEPER BEDROCK	55	504	547	529	501	**520**
MW07-29	SRB SITE	DEEPER BEDROCK	10	1,141	501	739	658	**760**
MW07-31	SRB SITE	DEEPER BEDROCK	70	247	63	348	301	**240**
MW07-32	HARRINGTON PROPERTY	DEEPER BEDROCK	115	47	36	<MDA (35)	<MDA (35)	**42**
MW07-34	SRB SITE	SHALLOW BEDROCK	10	957	940	903	830	**908**
MW07-35	CITY PROPERTY	SHALLOW BEDROCK	55	1,496	1,239	1,260	1,192	**1,297**
MW07-36	CITY PROPERTY	SHALLOW BEDROCK	80	1,327	801	1,052	1,240	**1,105**
MW07-37	SRB SITE	SHALLOW BEDROCK	60	735	678	652	643	**677**
Residential and Business Wells								
RW-2	185 MUD LAKE ROAD		1,100	34		29		**32**
RW-3	183 MUD LAKE ROAD		1,100	31		38		**35**
RW-5	171 SAWMILL ROAD		2,300	6		6		**6**
RW-6	40987 HWY 41		1,400	5		4		**5**
RW-7	40925 HWY 41		1,600	<4		4		**4**
B-1	VALLEY POOL SERVICE OFFICE		160	680		823		**752**
B-2	SUPERIOR PROPANE TRUCK WASH		250	610		430		**520**

Groundwater Monitoring Data



Monitoring Wells

Groundwater Monitoring Data



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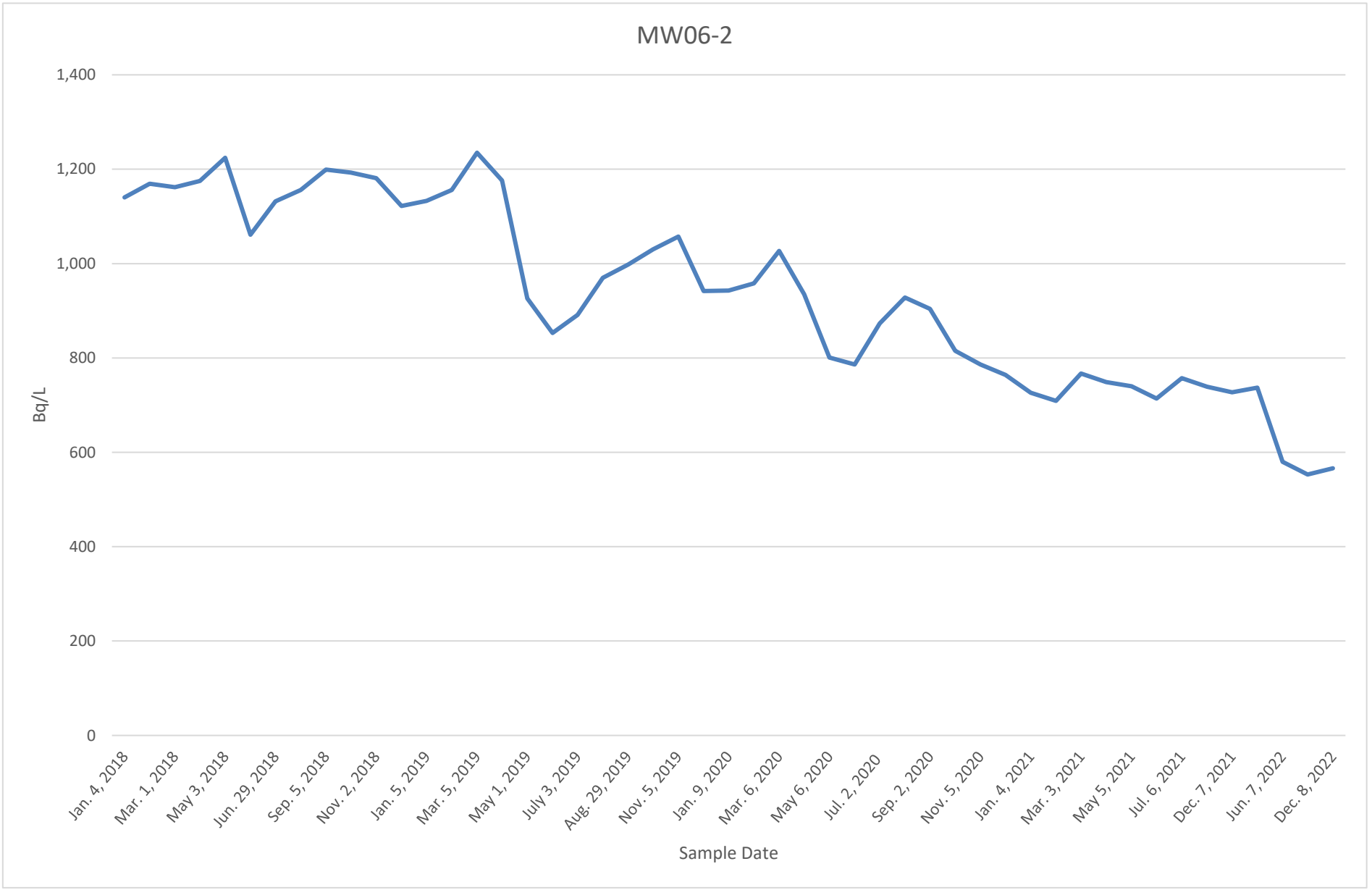
Groundwater Monitoring Data



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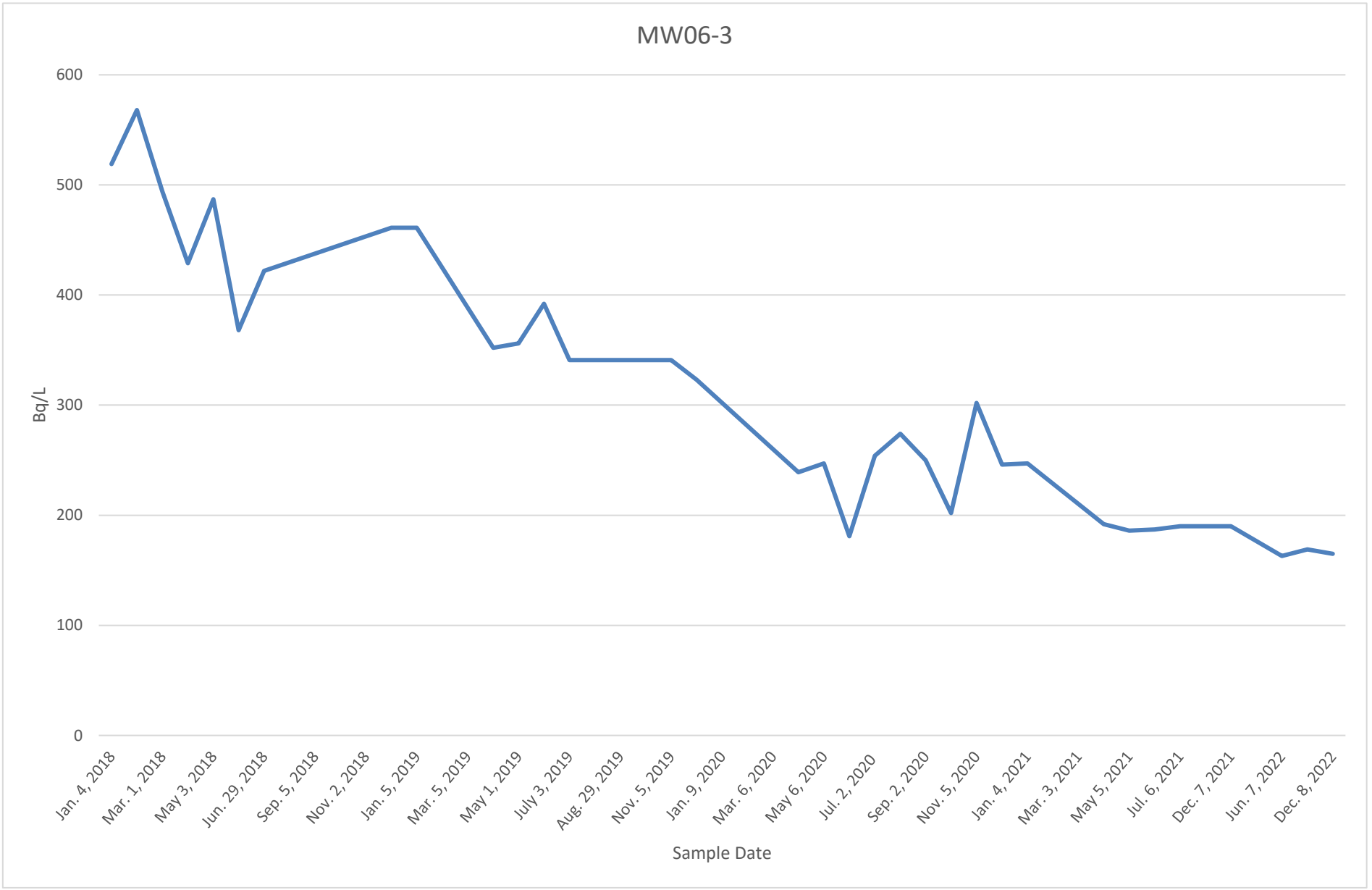

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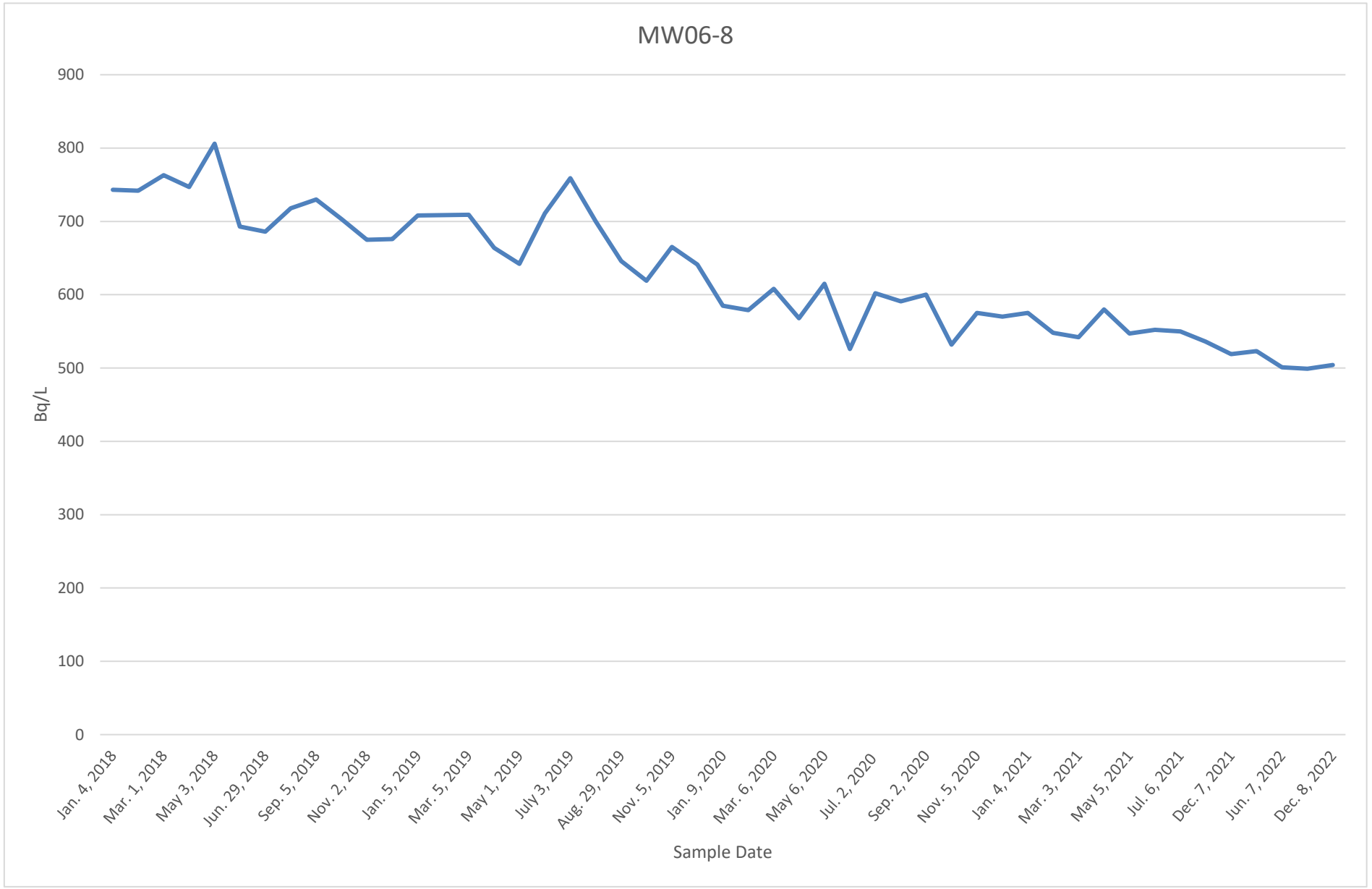

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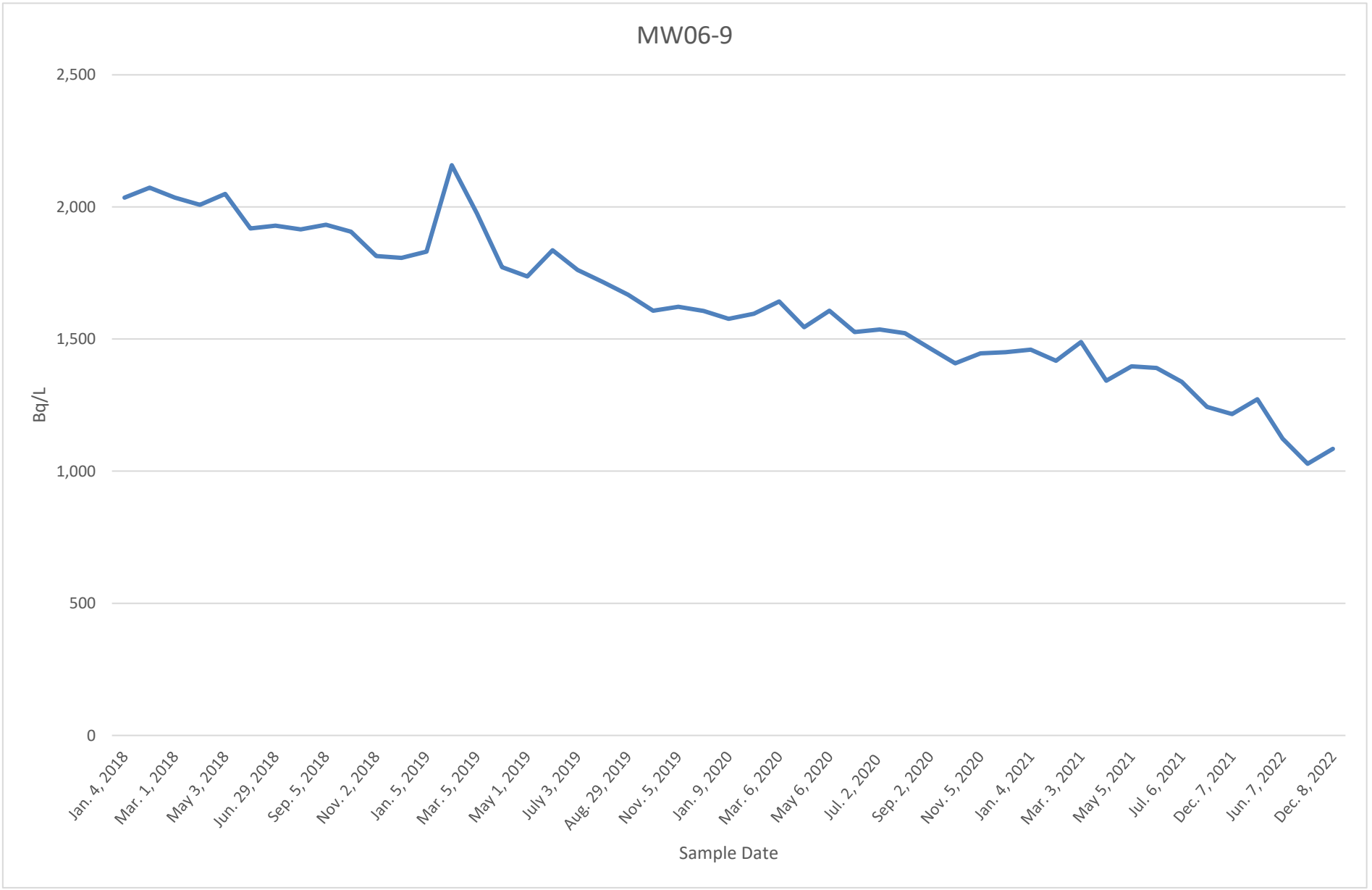

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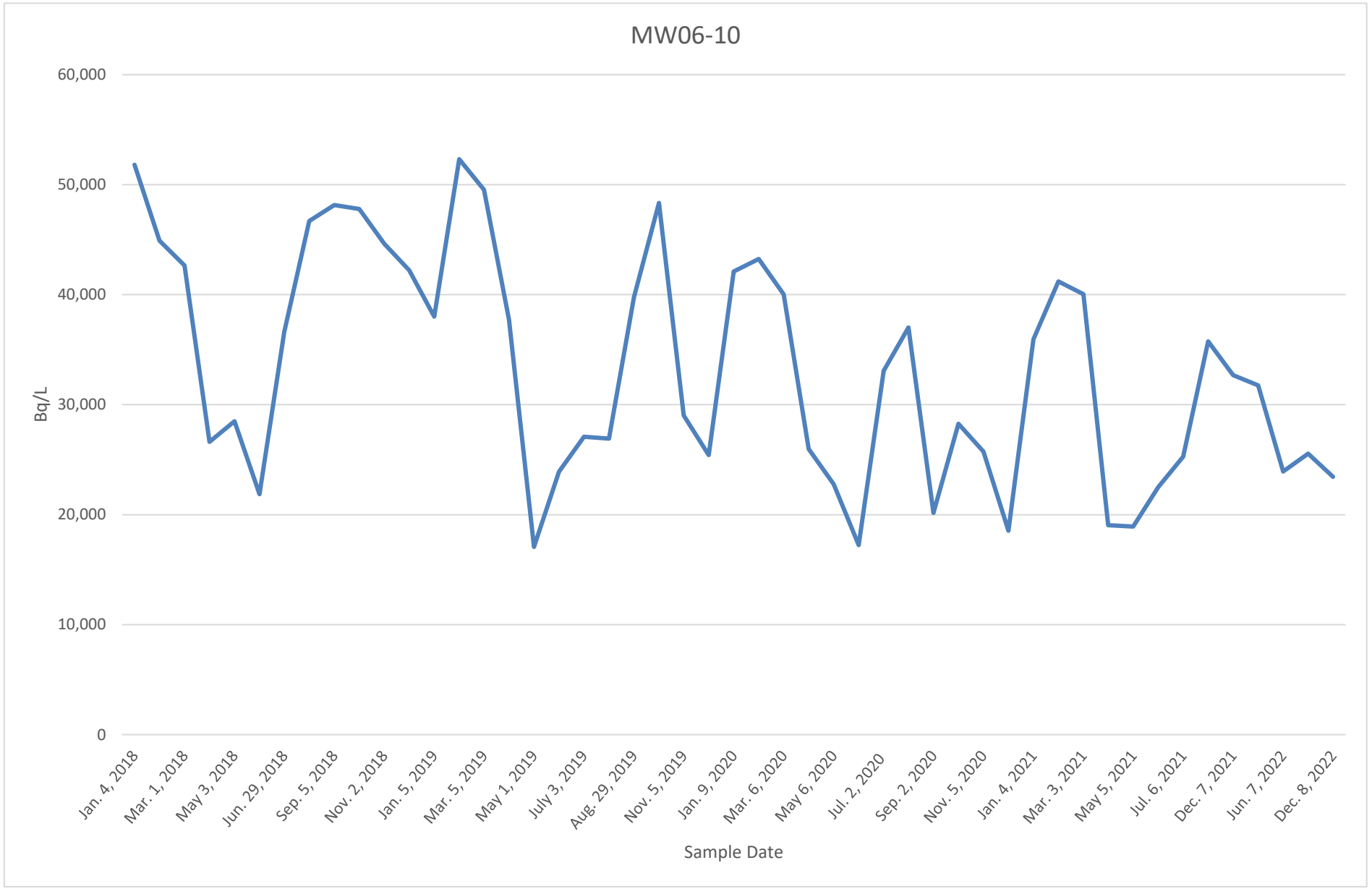

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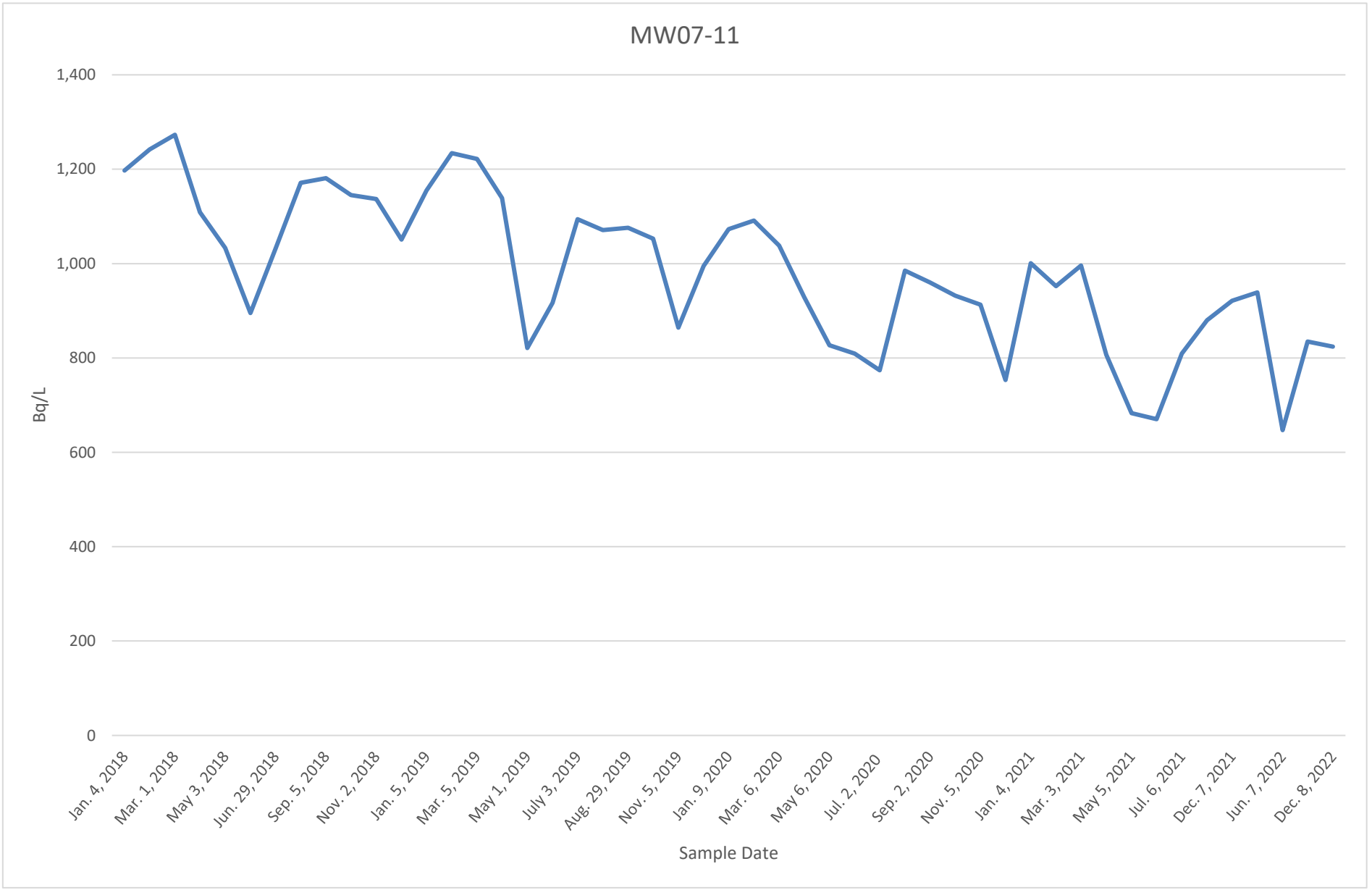

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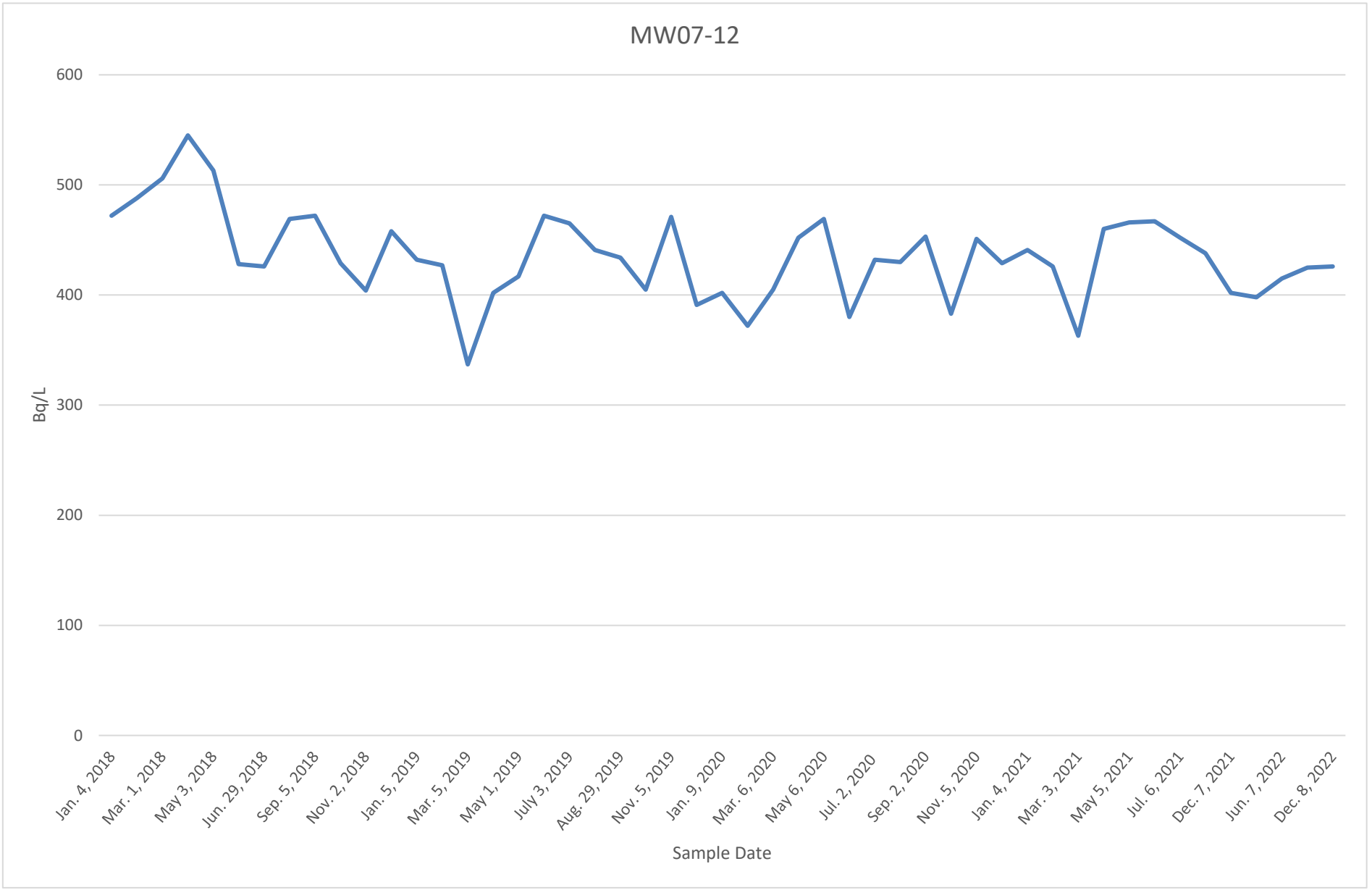

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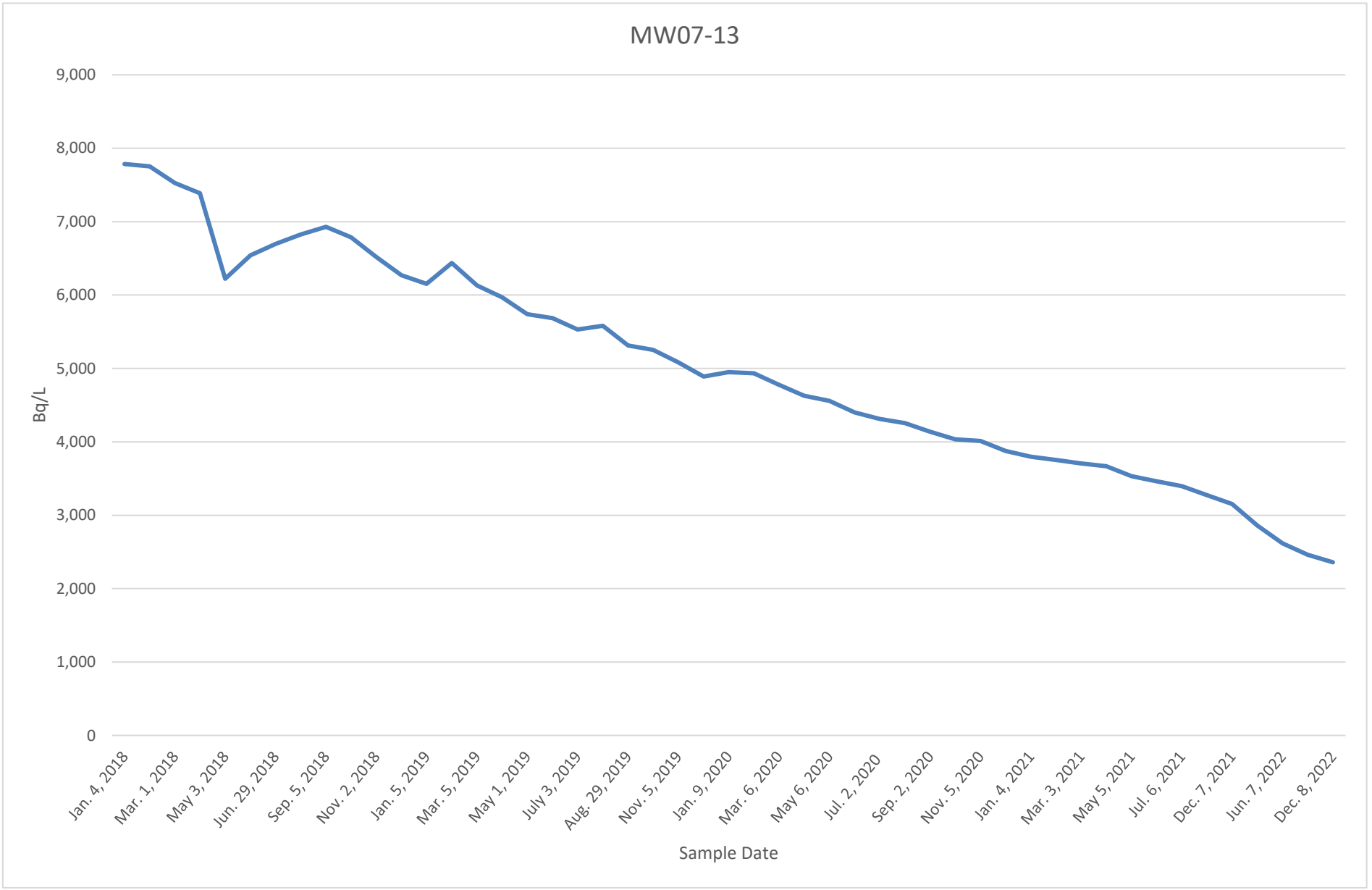

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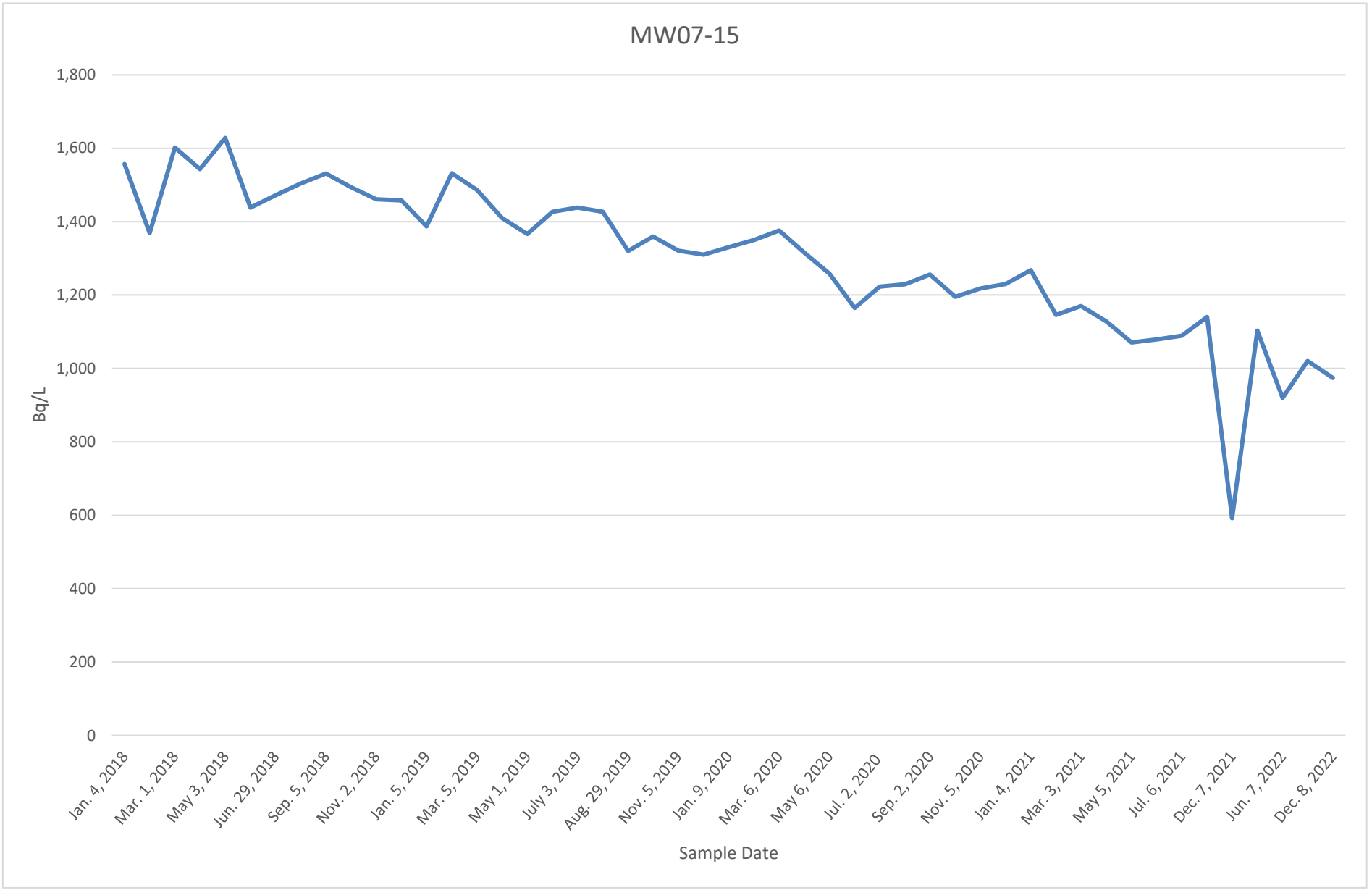

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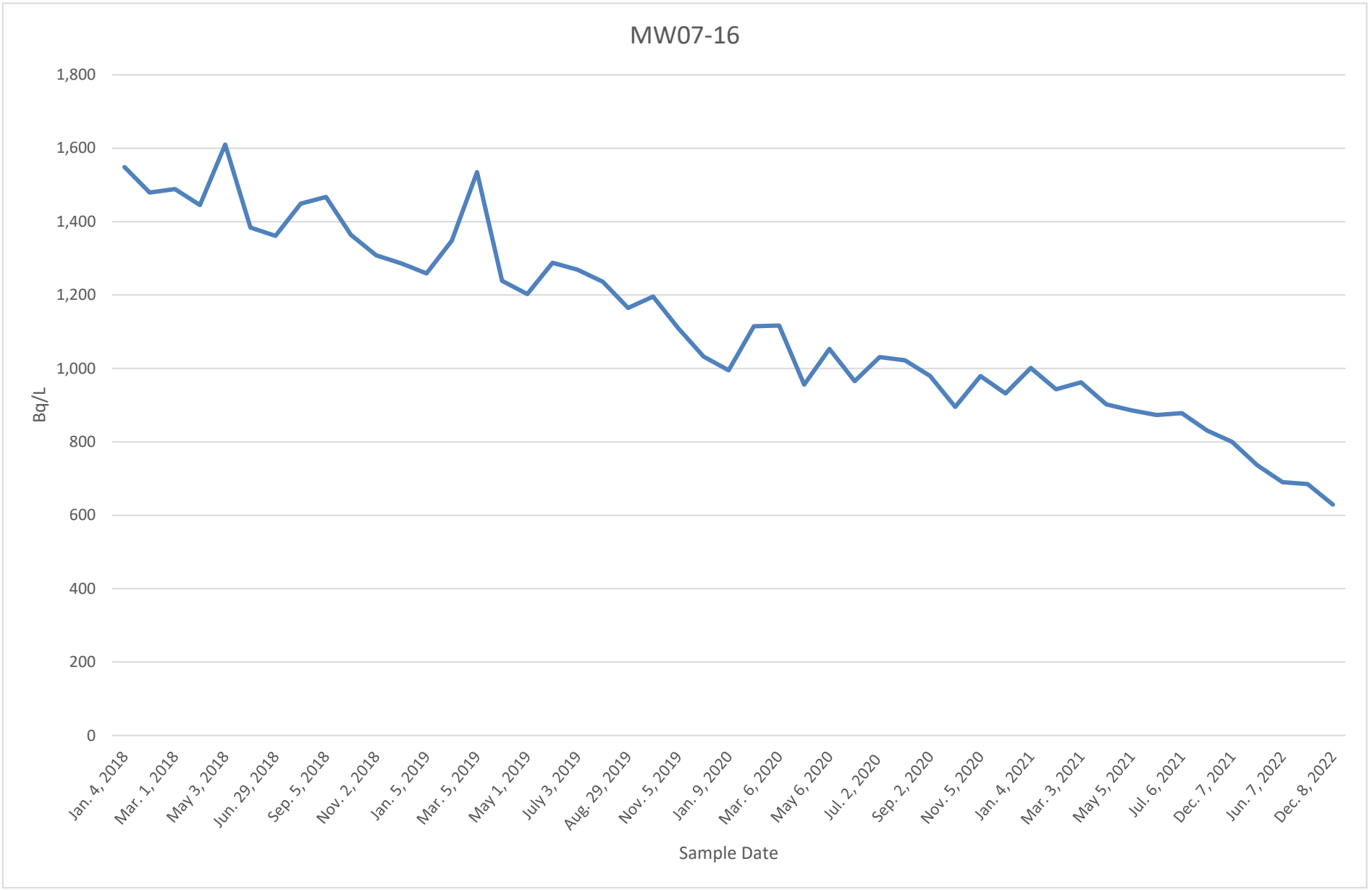

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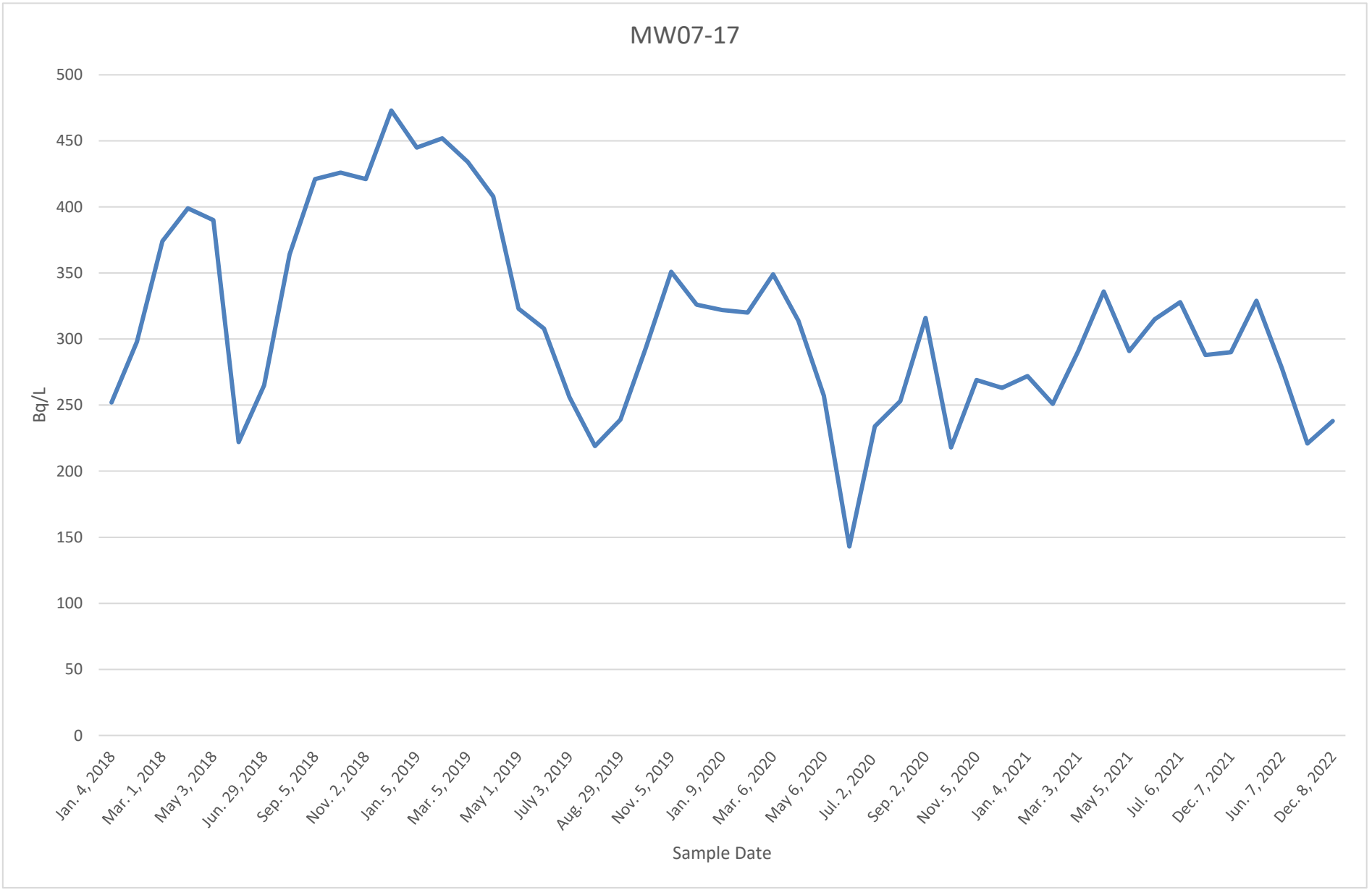

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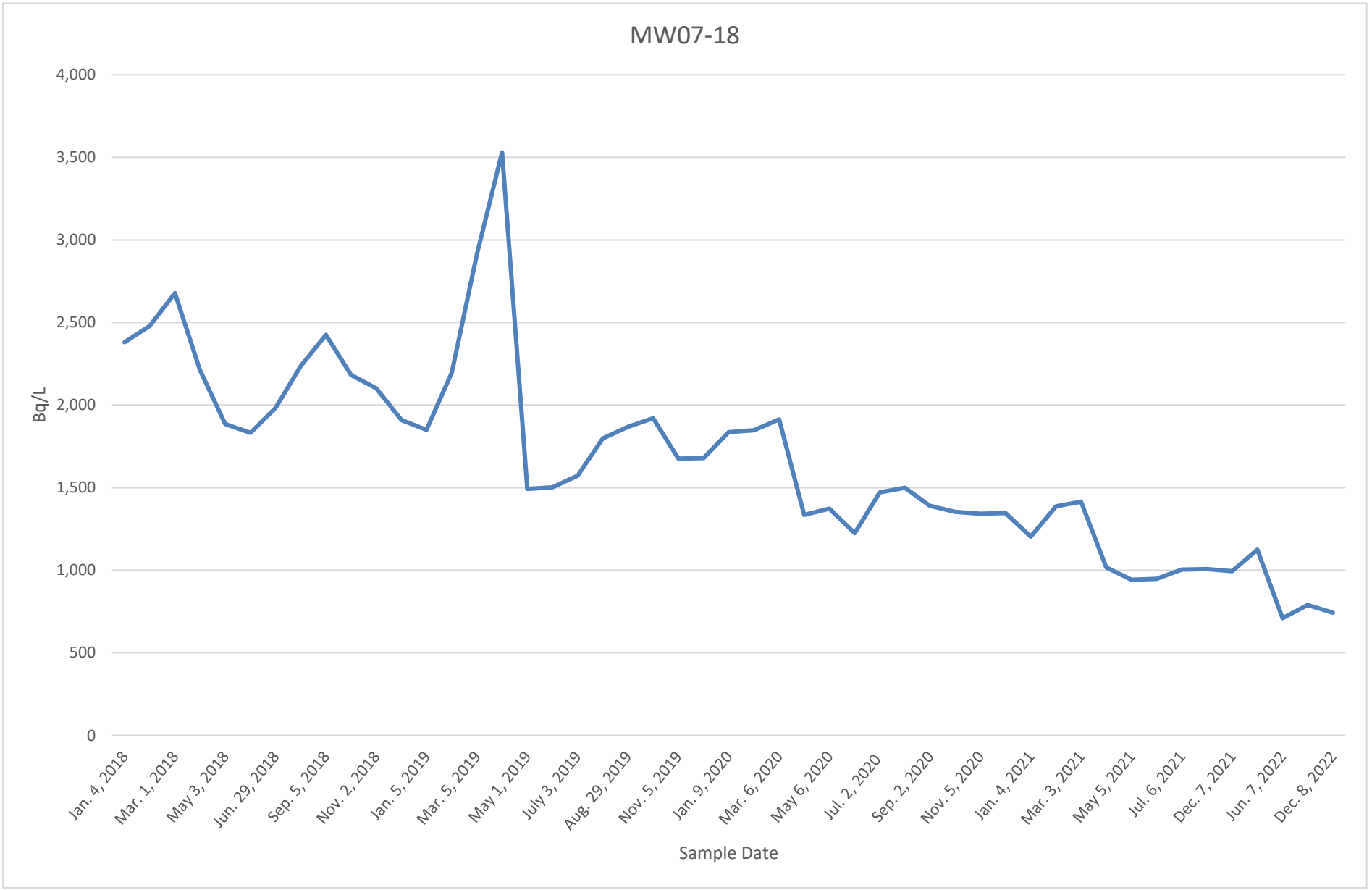

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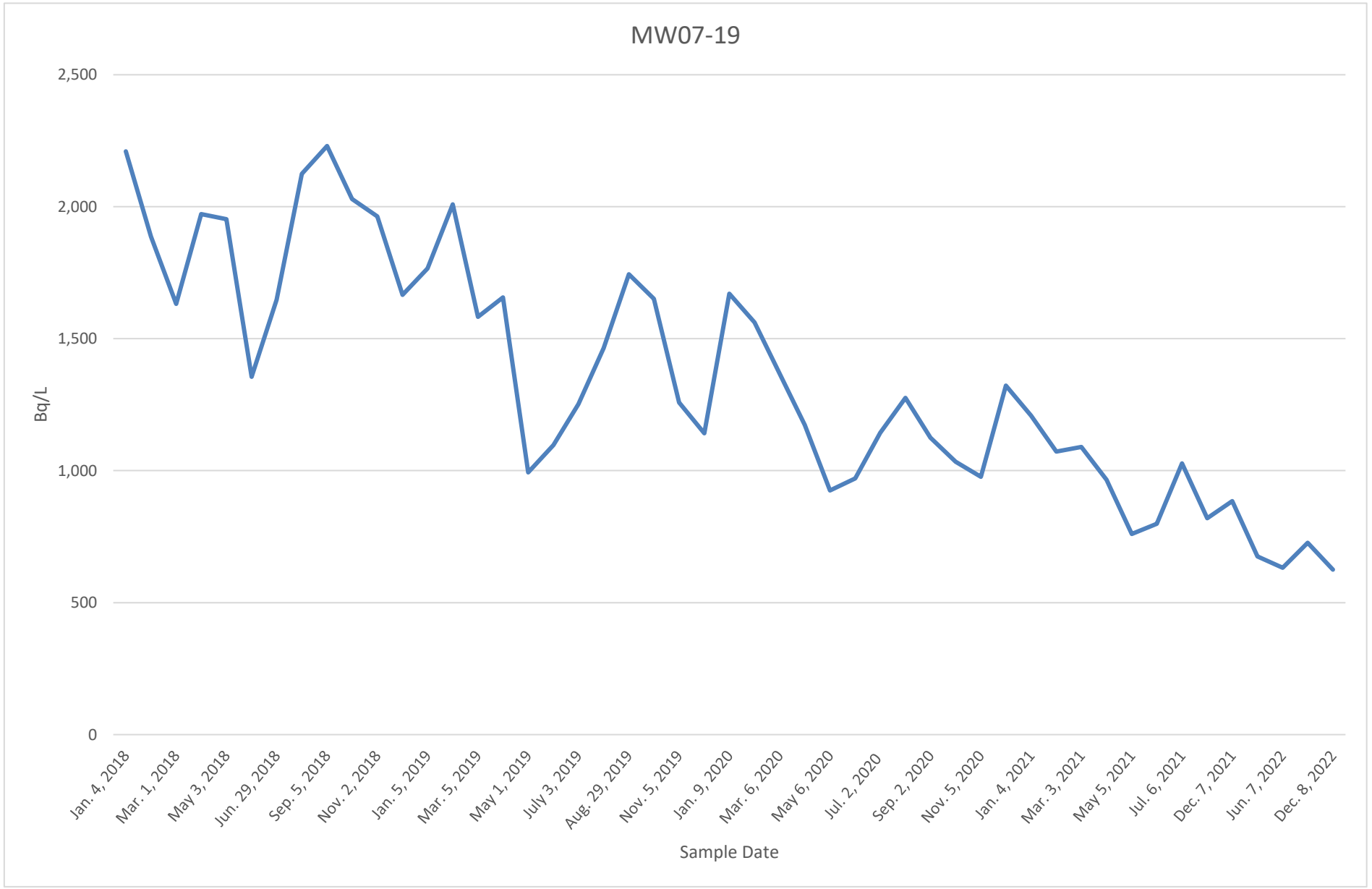

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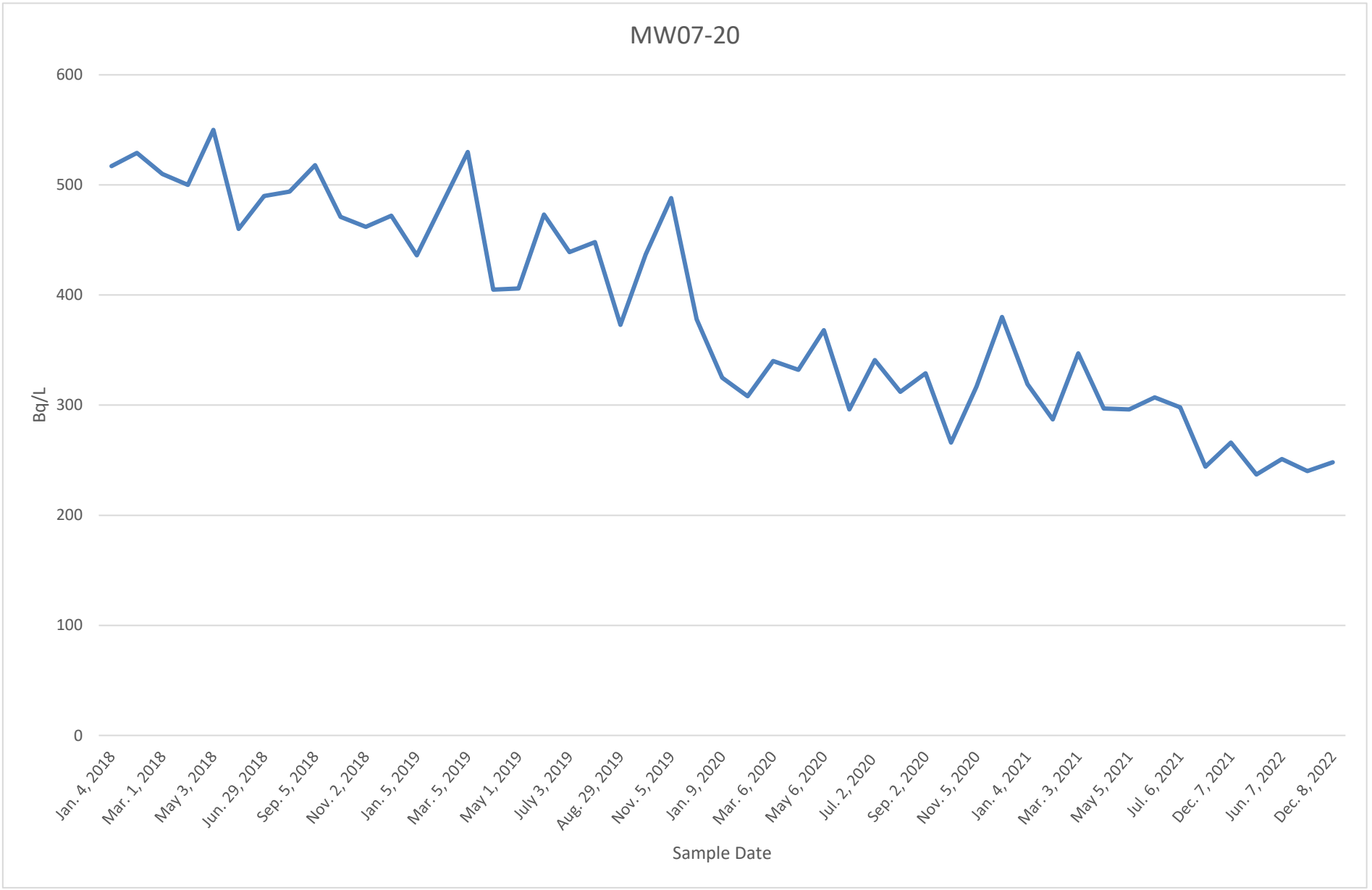
Groundwater Monitoring Data



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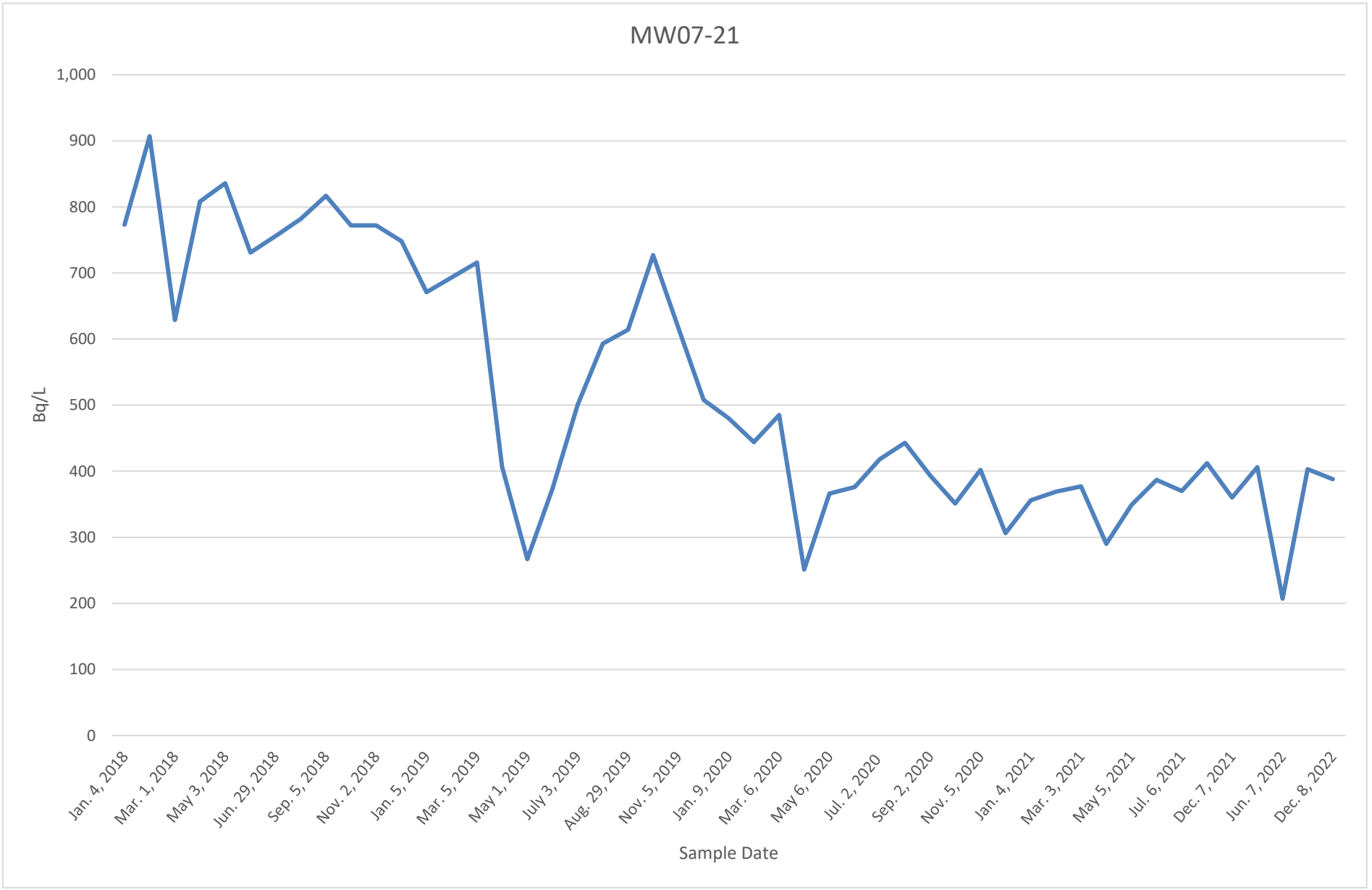

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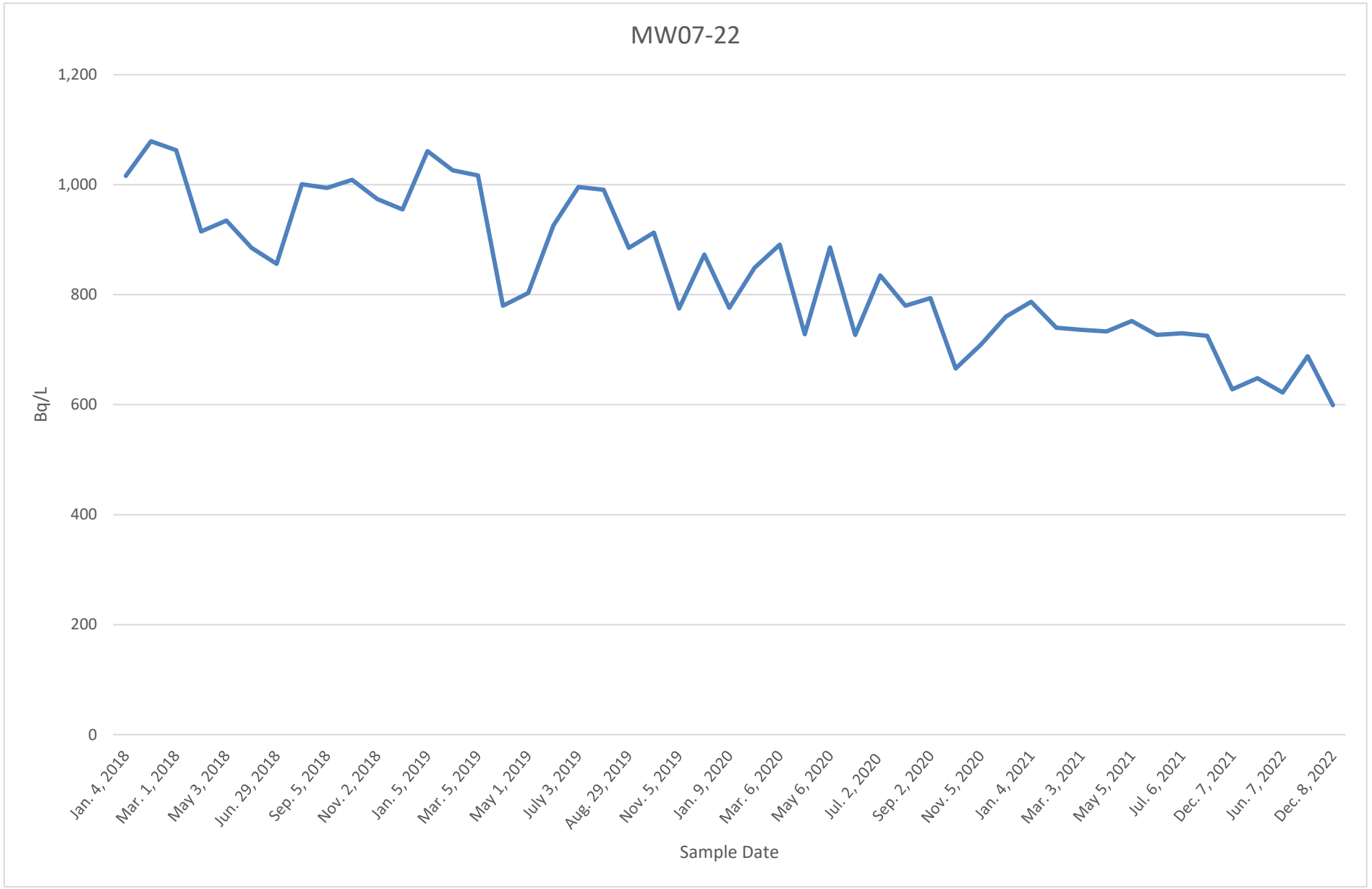

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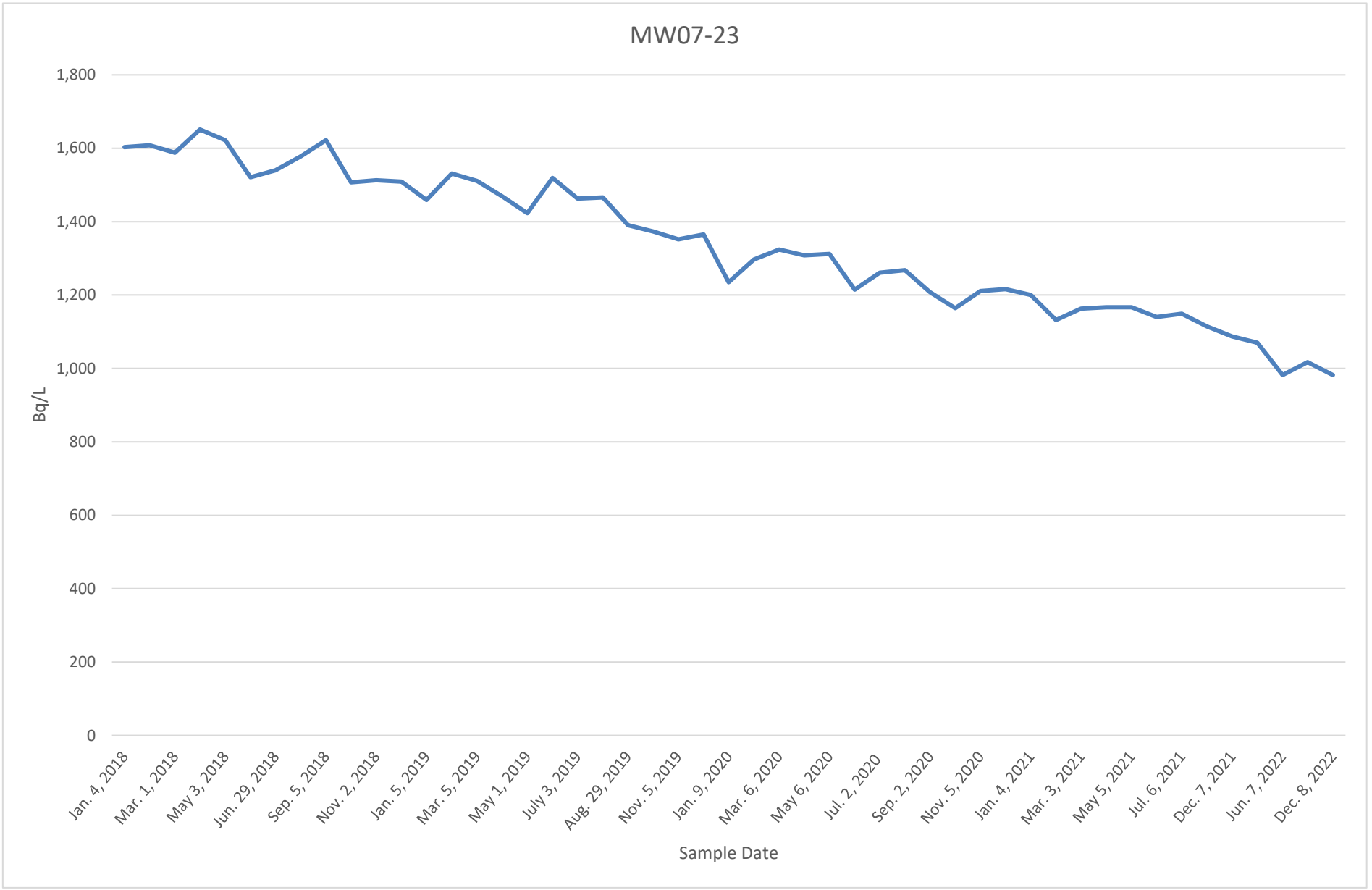

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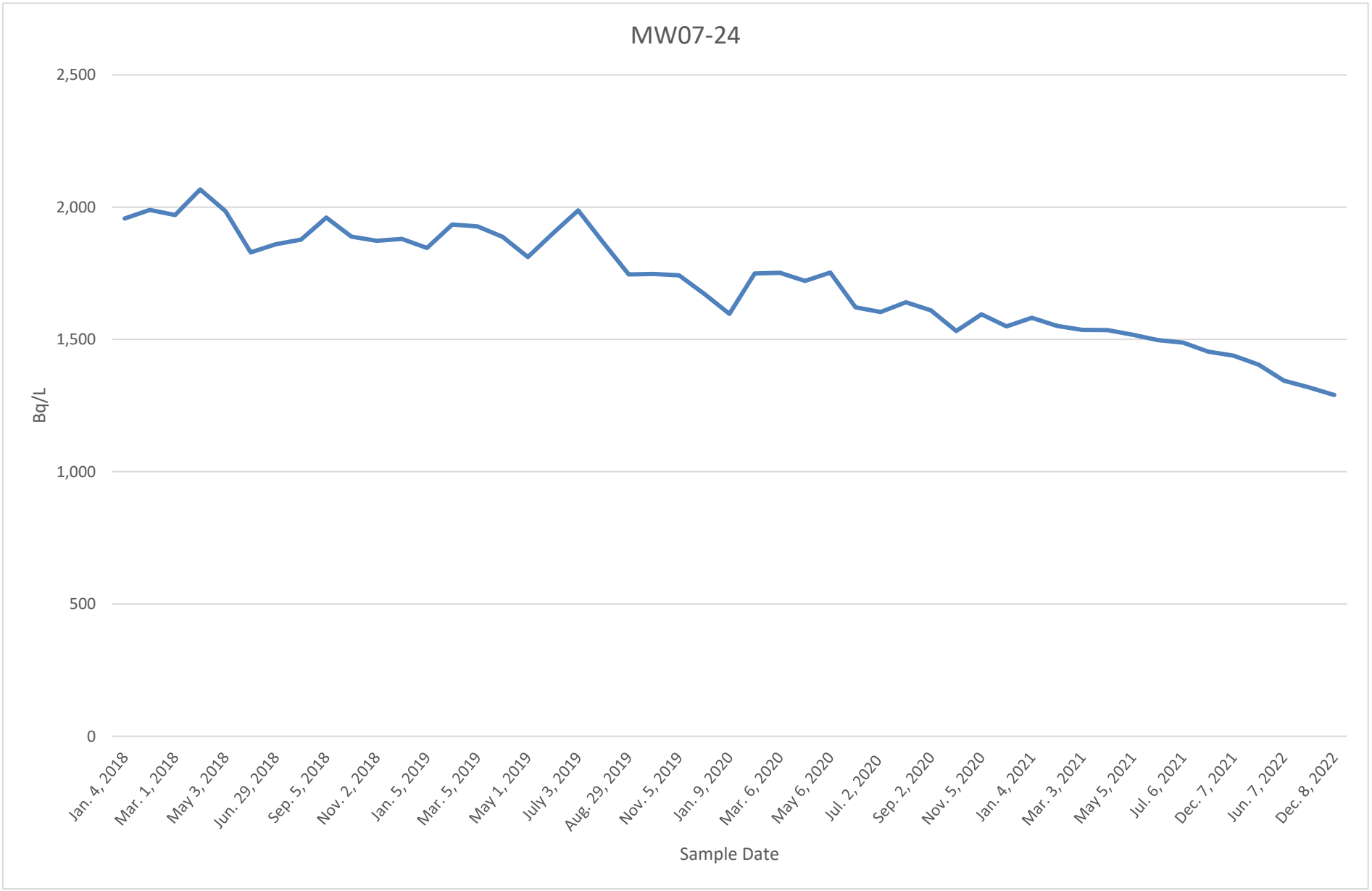
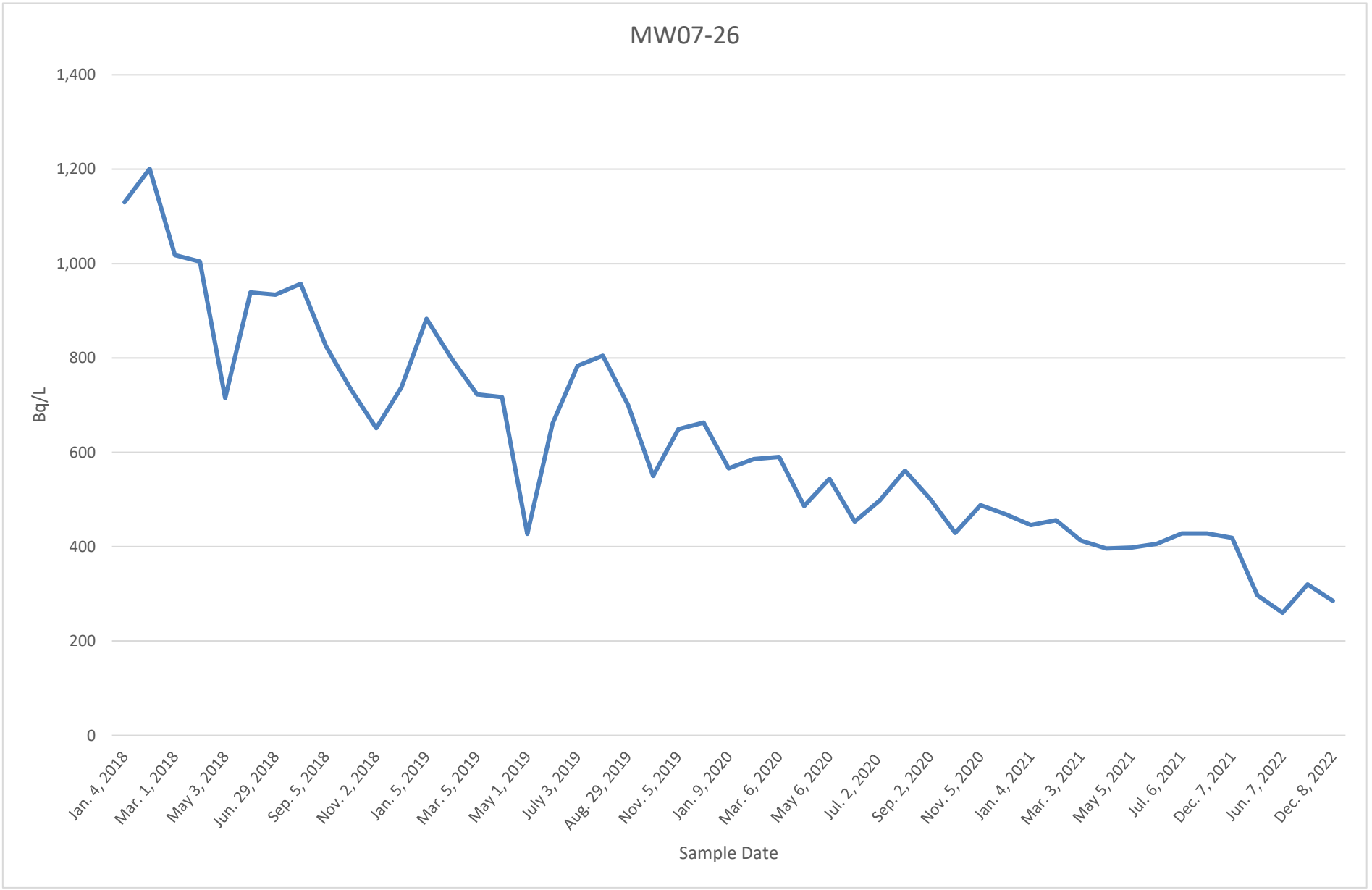


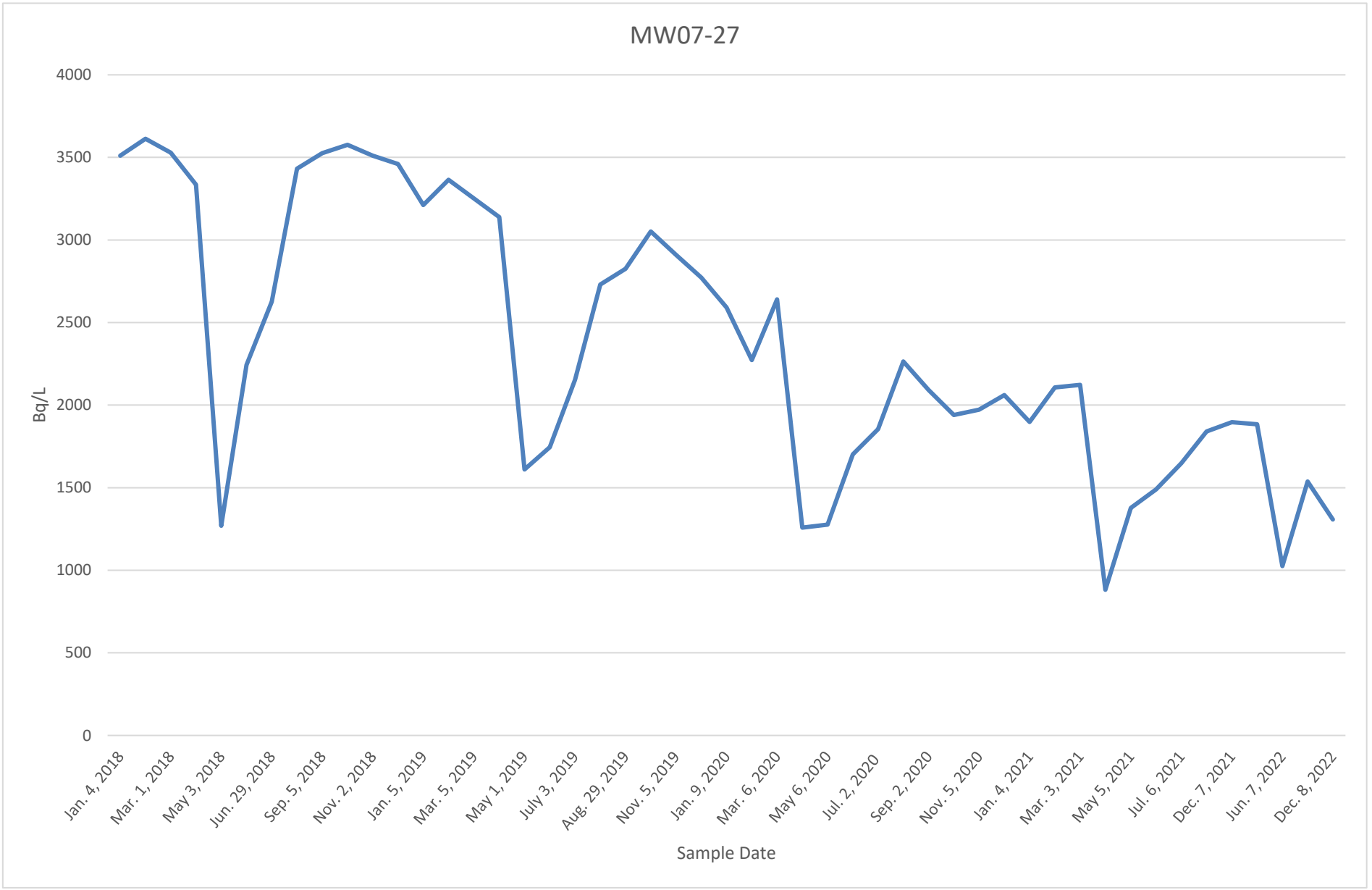
APPENDIX N

Groundwater Monitoring Data



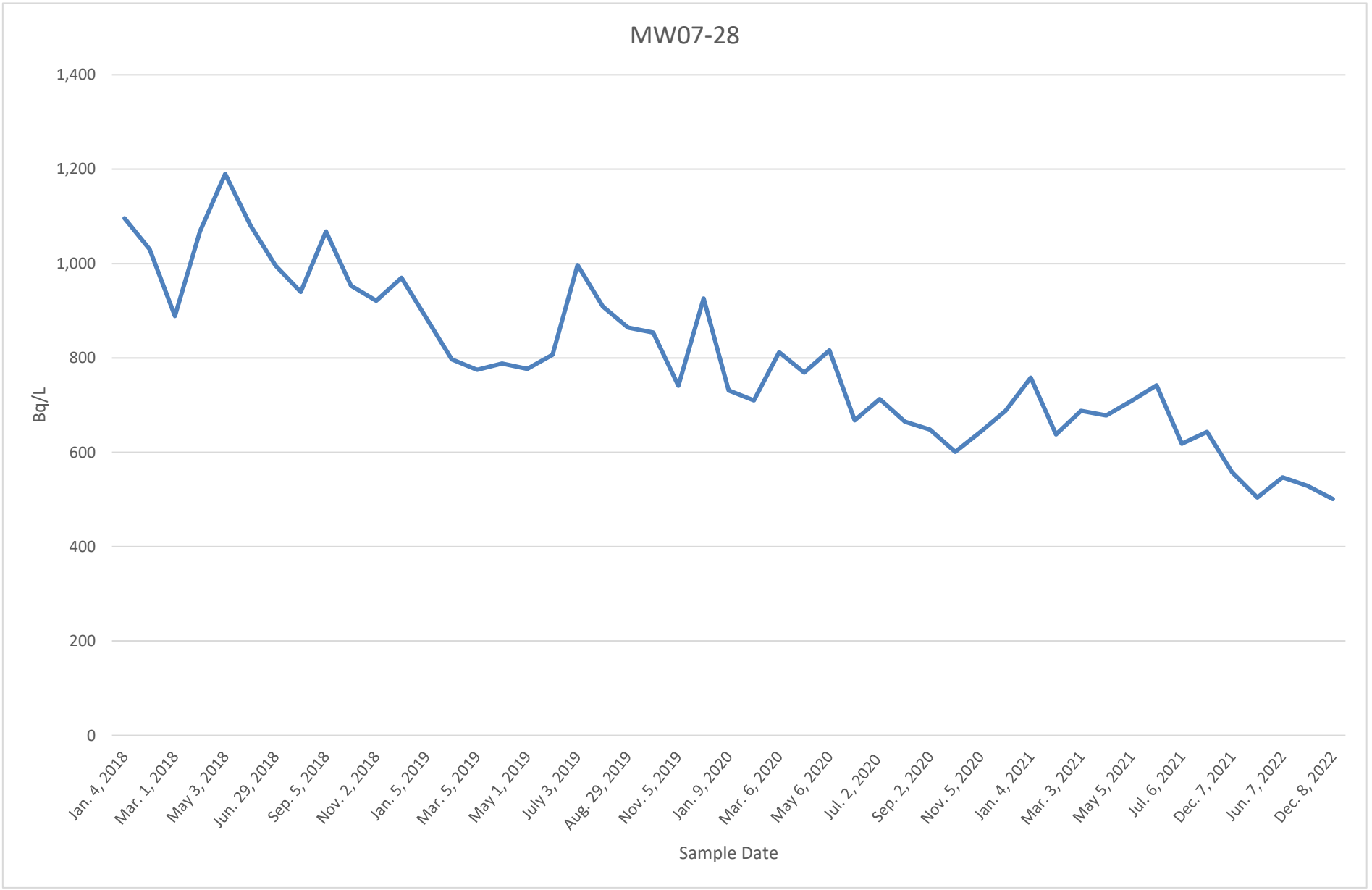
APPENDIX N

Groundwater Monitoring Data



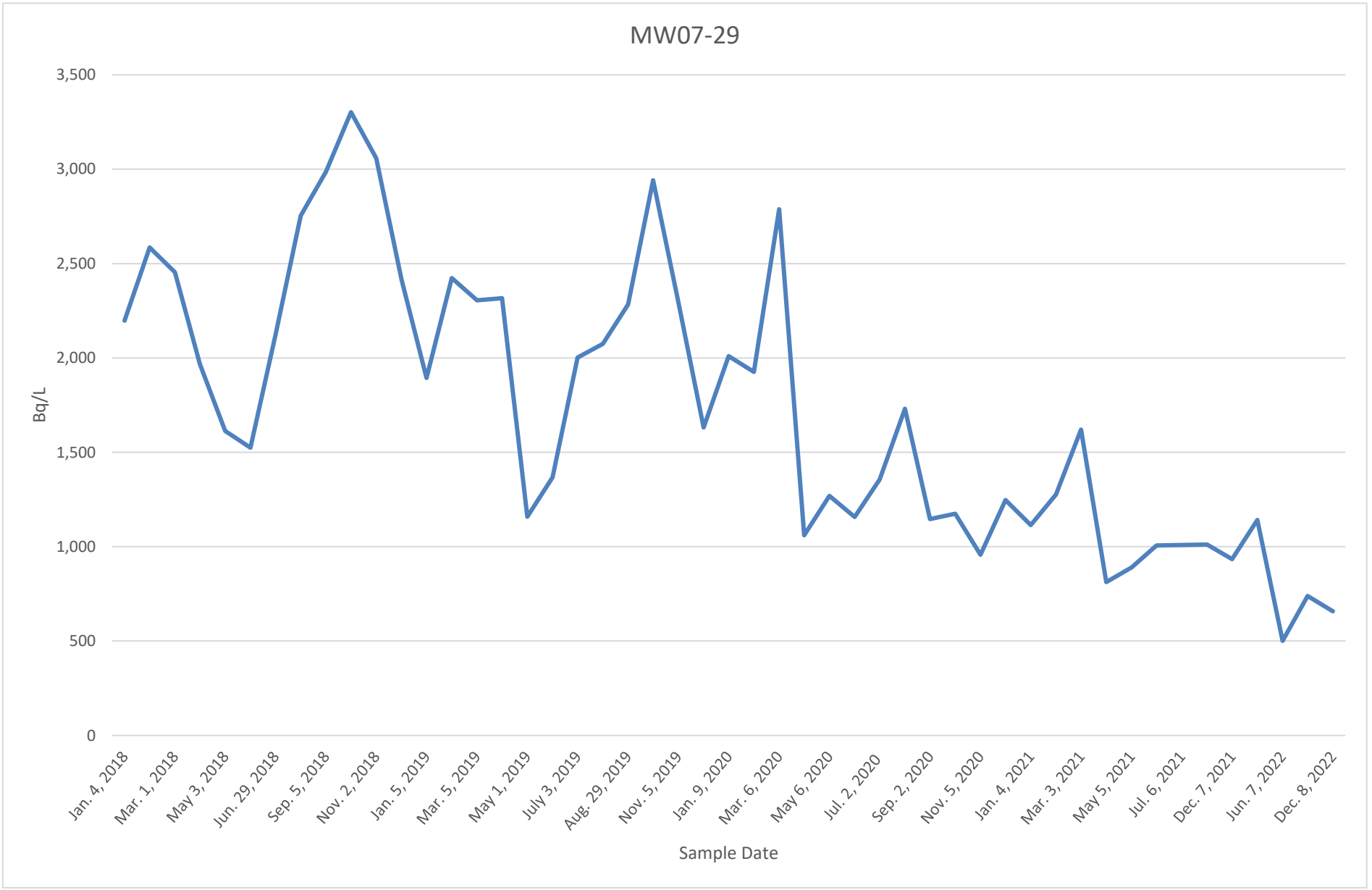
APPENDIX N

Groundwater Monitoring Data



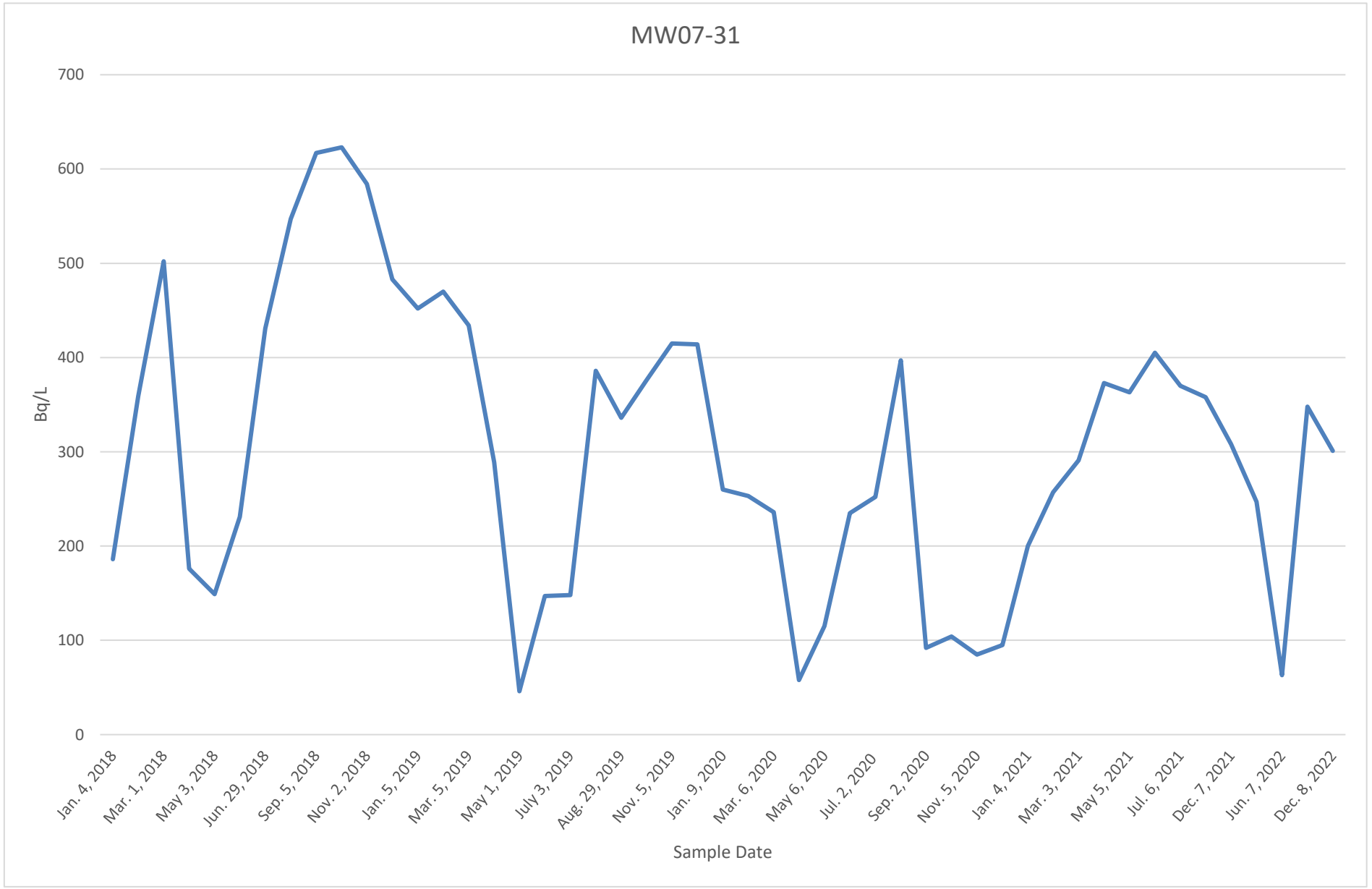
APPENDIX N

Groundwater Monitoring Data



APPENDIX N

Groundwater Monitoring Data



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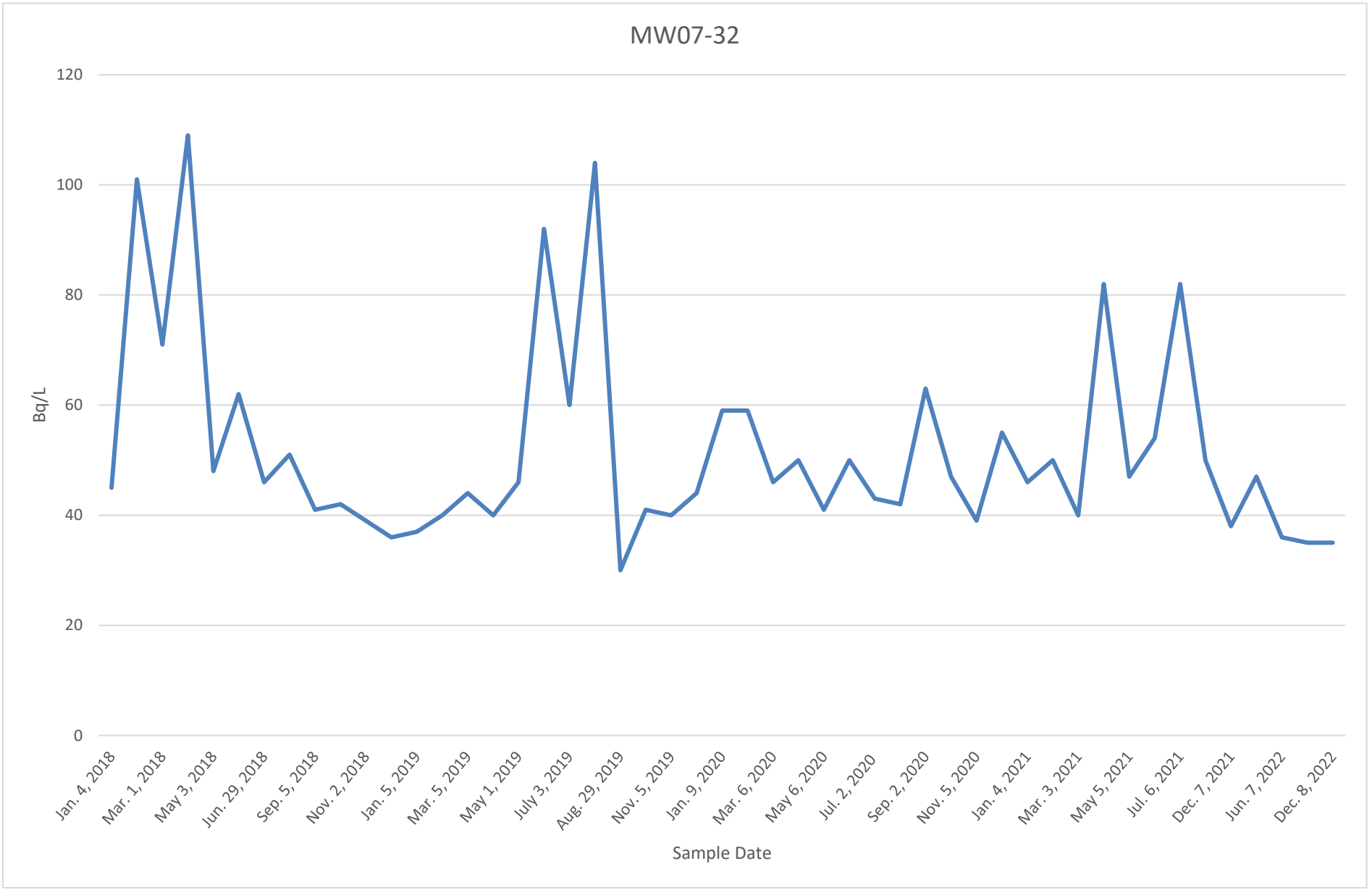
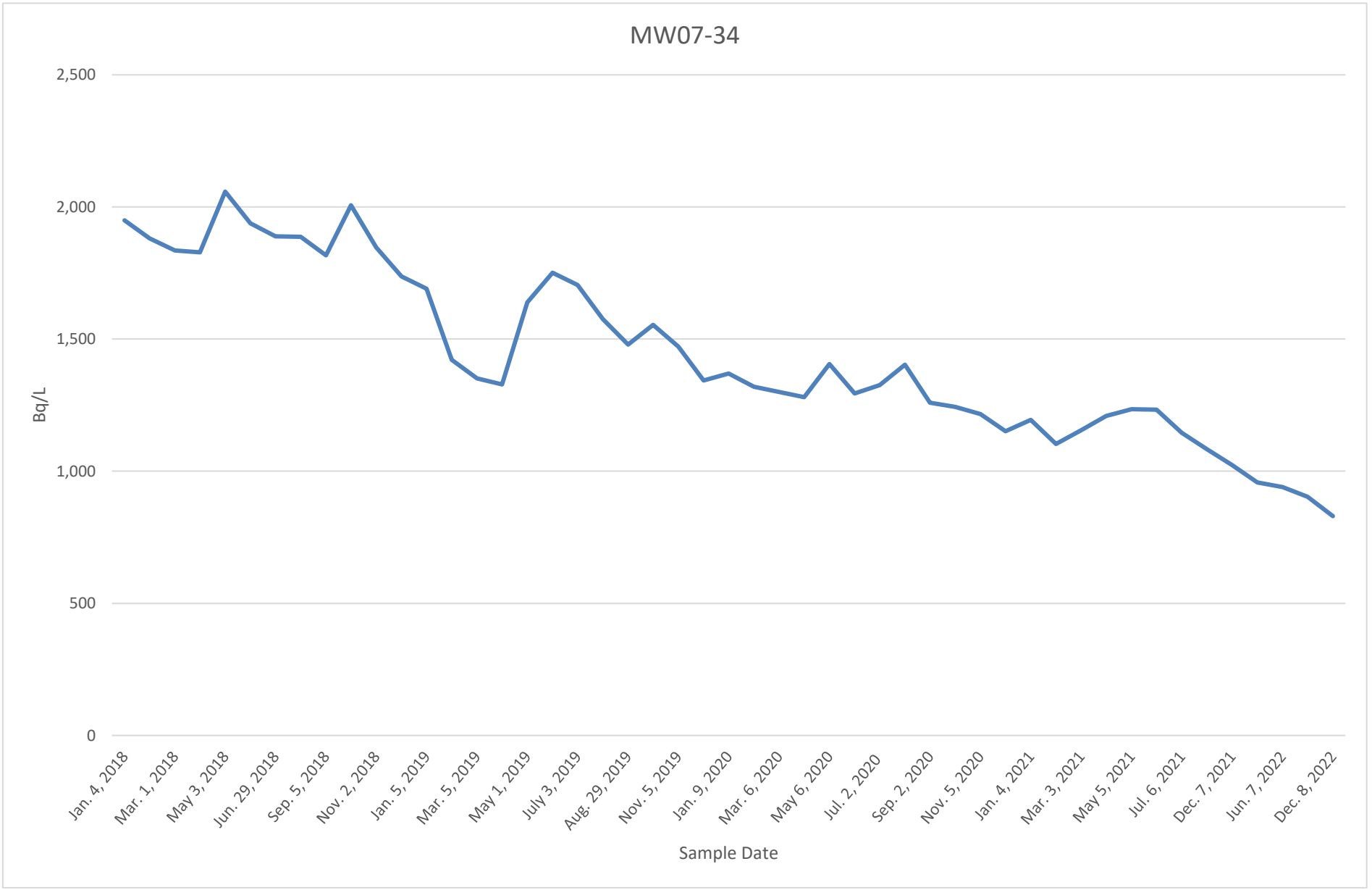
Groundwater Monitoring Data



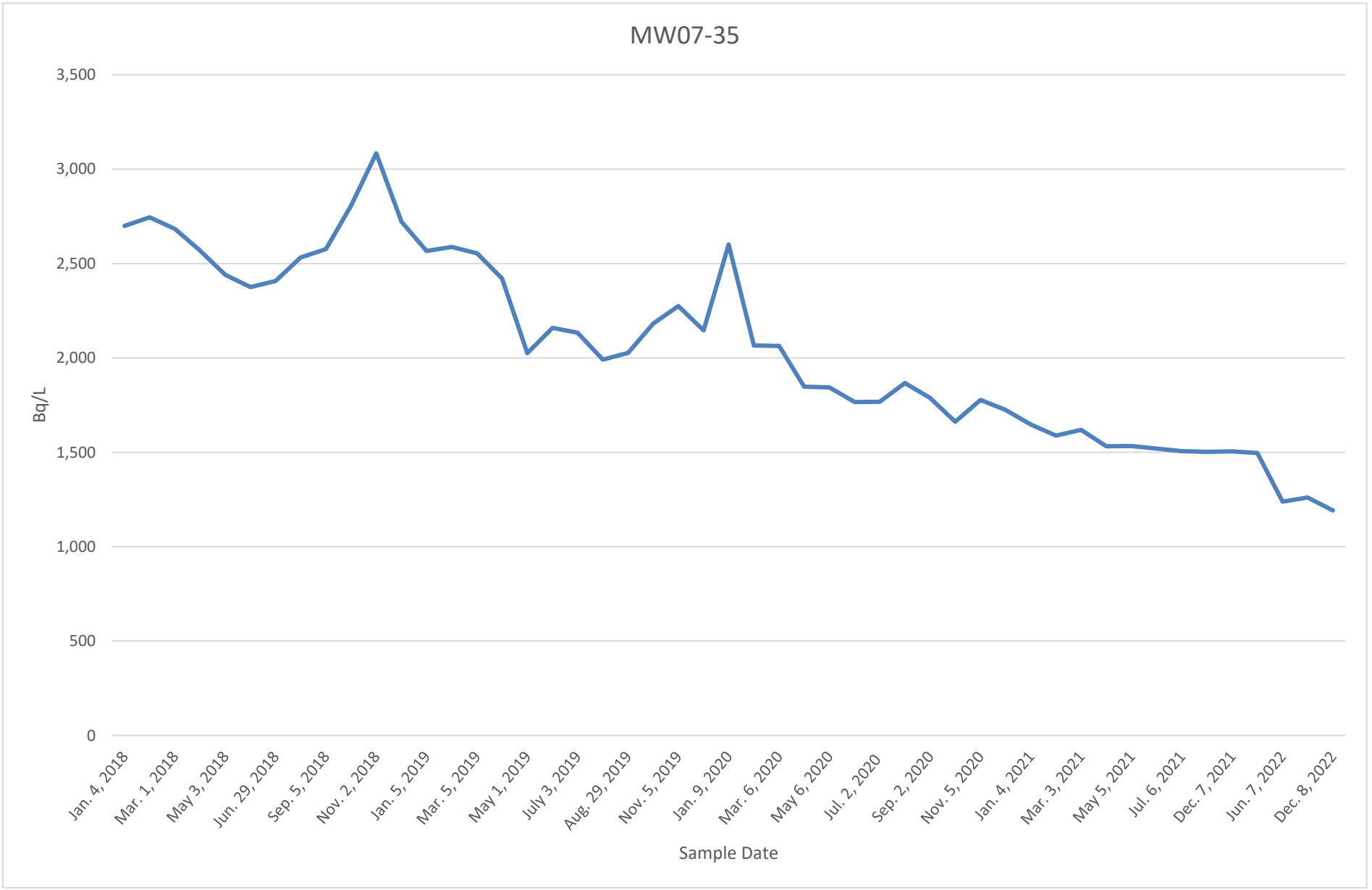
APPENDIX N

Groundwater Monitoring Data



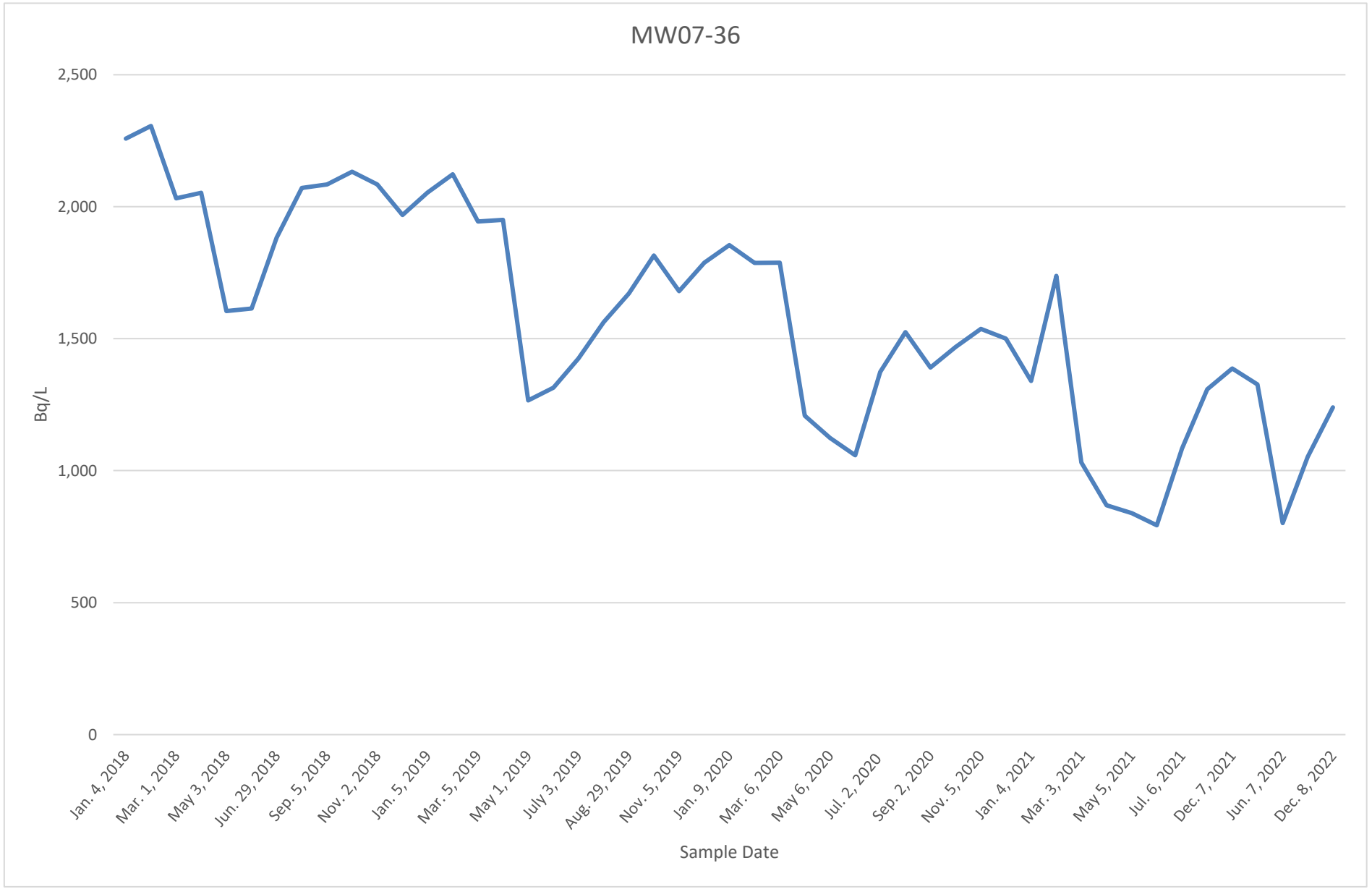
APPENDIX N

Groundwater Monitoring Data



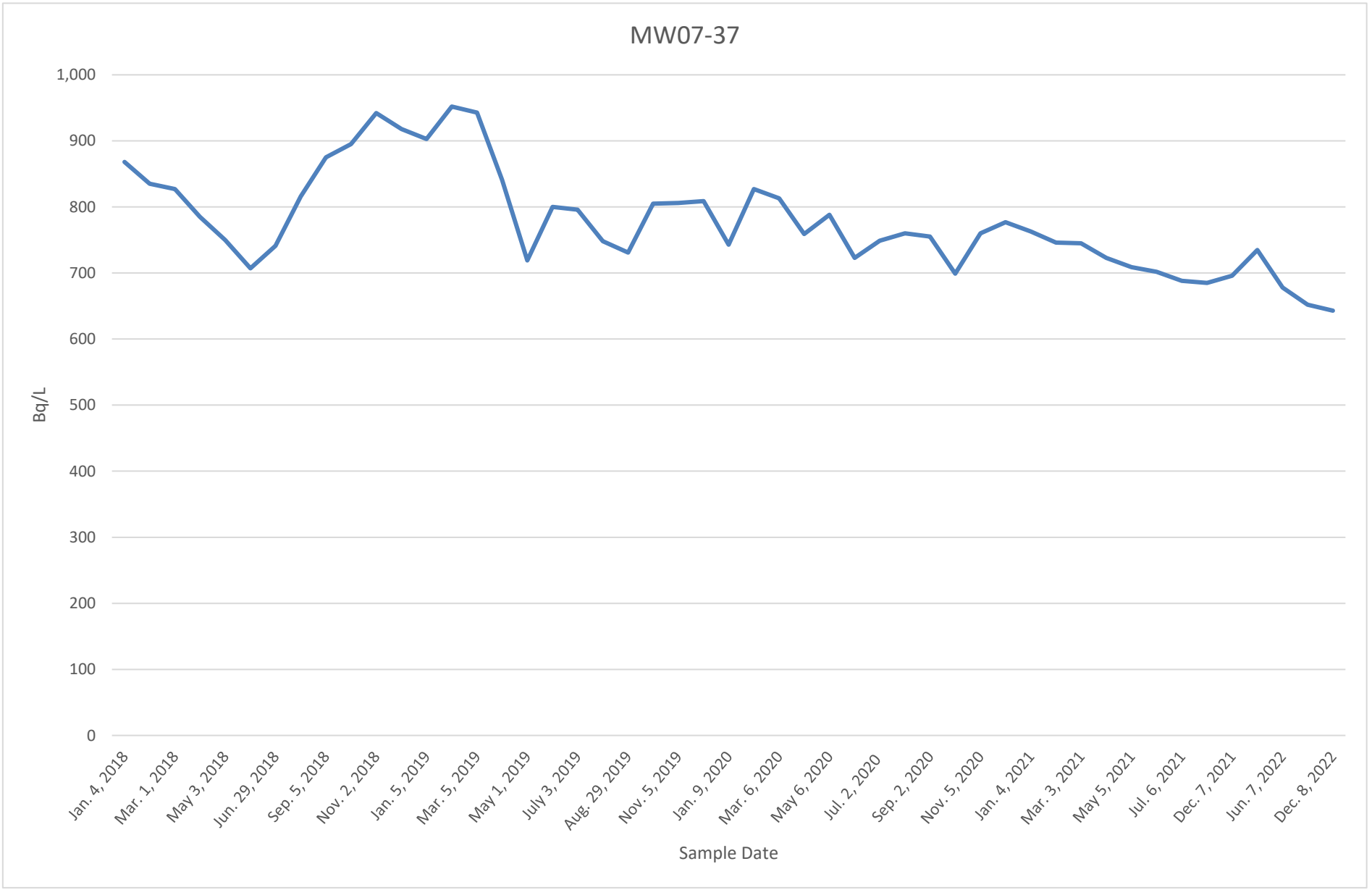
APPENDIX N

Groundwater Monitoring Data



APPENDIX N

Groundwater Monitoring Data



APPENDIX N

APPENDIX O

Gaseous Effluent Data

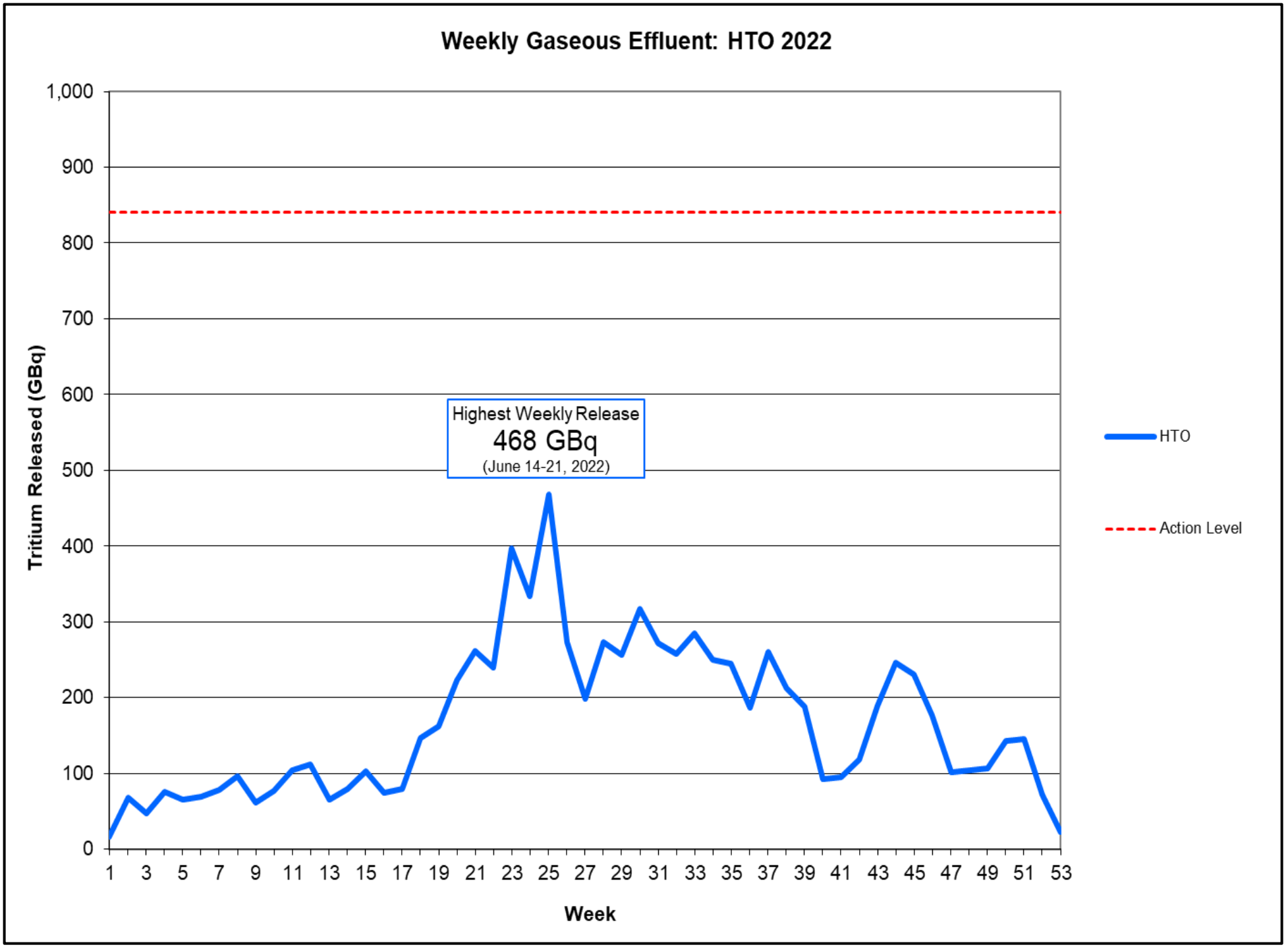
Gaseous Effluent Data

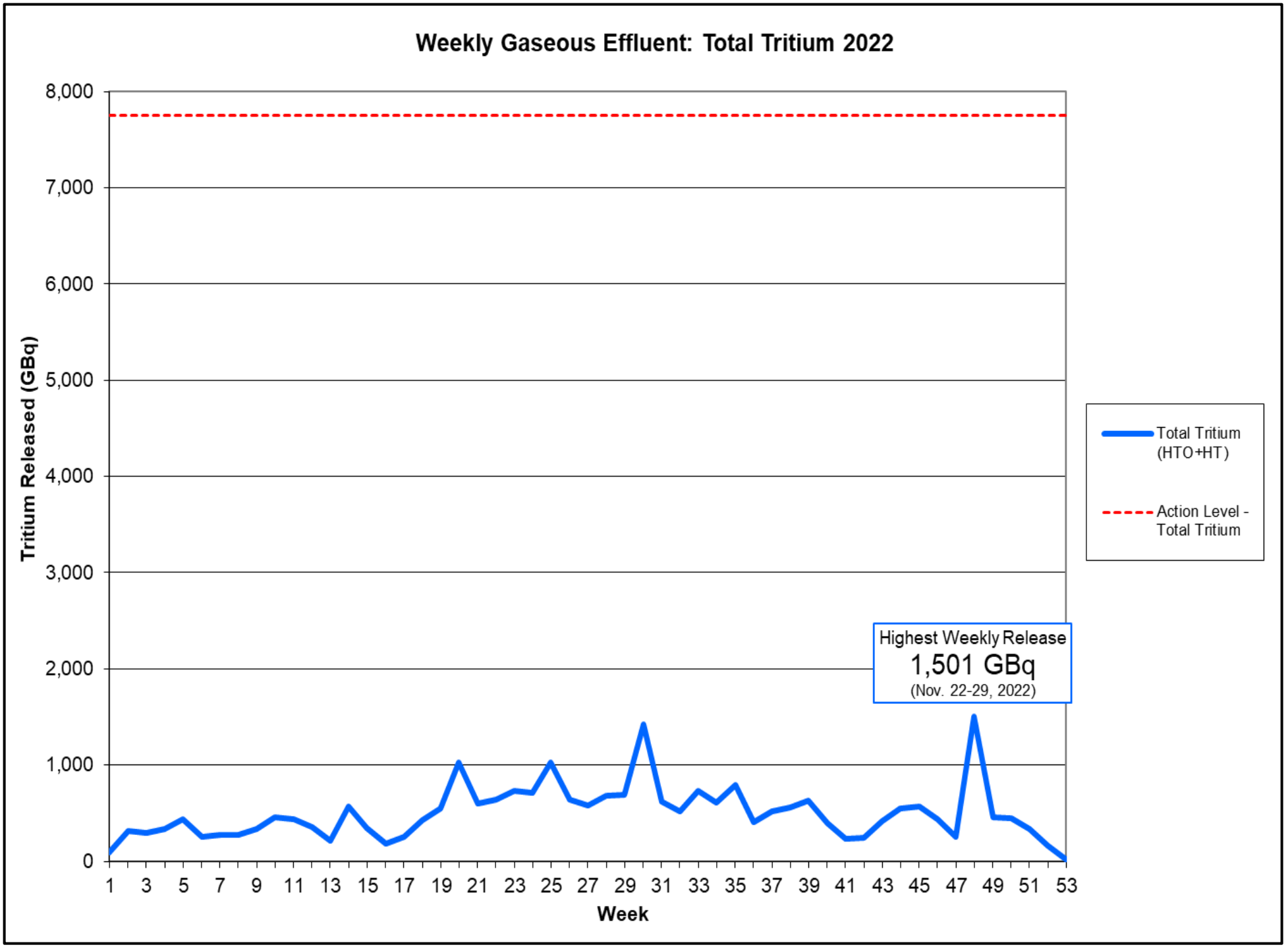
2022 Gaseous Effluent Data

Week	Date		H-3 in Air (GBq)			(GBq)		% 2021 SRBT DRL (12 hr. TJF Data)				Weekly Action Levels	
	Initial	Final	HTO	HT	Total	∑(HTO)	∑(HTO + HT)	1 year old	10 year old	Adult Resident	Adult Worker	HTO (840 GBq)	HTO+HT (7,753 GBq)
1	2021-12-28	2022-01-04	16.26	70.74	87.00	16.26	87.00	0.01	0.01	0.01	0.02	2%	1%
2	2022-01-04	2022-01-11	67.61	248.63	316.24	83.87	403.24	0.03	0.03	0.03	0.07	8%	4%
3	2022-01-11	2022-01-18	46.87	248.72	295.59	130.74	698.83	0.02	0.02	0.02	0.05	6%	4%
4	2022-01-18	2022-01-25	75.38	261.29	336.67	206.12	1035.50	0.03	0.03	0.03	0.08	9%	4%
5	2022-01-25	2022-02-01	65.00	371.48	436.48	271.12	1471.98	0.03	0.03	0.03	0.07	8%	6%
6	2022-02-01	2022-02-08	68.69	189.76	258.45	339.81	1730.43	0.03	0.03	0.03	0.07	8%	3%
7	2022-02-08	2022-02-15	78.63	199.98	278.61	418.44	2009.04	0.03	0.04	0.03	0.08	9%	4%
8	2022-02-15	2022-02-22	96.50	173.61	270.11	514.94	2279.15	0.04	0.04	0.04	0.09	11%	3%
9	2022-02-22	2022-03-01	60.81	270.04	330.85	575.75	2610.00	0.02	0.03	0.03	0.06	7%	4%
10	2022-03-01	2022-03-08	76.30	385.26	461.56	652.05	3071.56	0.03	0.04	0.03	0.08	9%	6%
11	2022-03-08	2022-03-15	104.60	329.33	433.93	756.65	3505.49	0.04	0.05	0.04	0.11	12%	6%
12	2022-03-15	2022-03-22	112.37	247.98	360.35	869.02	3865.84	0.04	0.05	0.05	0.11	13%	5%
13	2022-03-22	2022-03-29	64.86	147.77	212.63	933.88	4078.47	0.02	0.03	0.03	0.06	8%	3%
14	2022-03-29	2022-04-05	78.85	495.34	574.19	1012.73	4652.66	0.03	0.04	0.04	0.09	9%	7%
15	2022-04-05	2022-04-12	102.13	239.85	341.98	1114.86	4994.64	0.04	0.05	0.04	0.10	12%	4%
16	2022-04-12	2022-04-19	73.91	111.33	185.24	1188.77	5179.88	0.03	0.03	0.03	0.07	9%	2%
17	2022-04-19	2022-04-26	80.09	174.43	254.52	1268.86	5434.40	0.03	0.04	0.03	0.08	10%	3%
18	2022-04-26	2022-05-03	146.76	279.64	426.40	1415.62	5860.80	0.05	0.06	0.06	0.14	17%	5%
19	2022-05-03	2022-05-10	161.89	385.60	547.49	1577.51	6408.29	0.06	0.07	0.07	0.16	19%	7%
20	2022-05-10	2022-05-17	222.93	801.59	1024.52	1800.44	7432.81	0.09	0.10	0.09	0.23	27%	13%
21	2022-05-17	2022-05-24	262.08	341.83	603.91	2062.52	8036.72	0.10	0.11	0.10	0.25	31%	8%
22	2022-05-24	2022-05-31	239.81	396.31	636.12	2302.33	8672.84	0.09	0.10	0.09	0.23	29%	8%
23	2022-05-31	2022-06-07	396.90	334.92	731.82	2699.23	9404.66	0.14	0.17	0.15	0.38	47%	9%
24	2022-06-07	2022-06-14	333.70	375.81	709.51	3032.93	10114.17	0.12	0.14	0.13	0.32	40%	9%
25	2022-06-14	2022-06-21	468.37	553.54	1021.91	3501.30	11136.08	0.17	0.20	0.18	0.45	56%	13%
26	2022-06-21	2022-06-28	272.72	365.85	638.57	3774.02	11774.65	0.10	0.12	0.11	0.26	32%	8%
27	2022-06-28	2022-07-05	198.69	385.71	584.40	3972.71	12359.05	0.07	0.09	0.08	0.19	24%	8%
28	2022-07-05	2022-07-12	273.24	409.86	683.10	4245.95	13042.15	0.10	0.12	0.11	0.26	33%	9%
29	2022-07-12	2022-07-19	256.36	430.02	686.38	4502.31	13728.53	0.09	0.11	0.10	0.25	31%	9%
30	2022-07-19	2022-07-26	316.69	1103.23	1419.92	4819.00	15148.45	0.12	0.15	0.13	0.32	38%	18%
31	2022-07-26	2022-08-02	272.19	350.13	622.32	5091.19	15770.77	0.10	0.12	0.11	0.26	32%	8%
32	2022-08-02	2022-08-09	257.37	257.98	515.35	5348.56	16286.12	0.09	0.11	0.10	0.25	31%	7%
33	2022-08-09	2022-08-16	285.39	451.24	736.63	5633.95	17022.75	0.10	0.12	0.11	0.28	34%	10%
34	2022-08-16	2022-08-23	249.47	359.56	609.03	5883.42	17631.78	0.09	0.11	0.10	0.24	30%	8%
35	2022-08-23	2022-08-30	244.28	547.04	791.32	6127.70	18423.10	0.09	0.11	0.10	0.24	29%	10%
36	2022-08-30	2022-09-06	187.25	222.84	410.09	6314.95	18833.19	0.07	0.08	0.07	0.18	22%	5%
37	2022-09-06	2022-09-13	259.78	262.49	522.27	6574.73	19355.46	0.09	0.11	0.10	0.25	31%	7%
38	2022-09-13	2022-09-20	212.29	351.25	563.54	6787.02	19919.00	0.08	0.09	0.08	0.21	25%	7%
39	2022-09-20	2022-09-27	187.96	446.82	634.78	6974.98	20553.78	0.07	0.08	0.08	0.19	22%	8%
40	2022-09-27	2022-10-04	91.75	307.36	399.11	7066.73	20952.89	0.04	0.04	0.04	0.09	11%	5%
41	2022-10-04	2022-10-11	94.39	139.99	234.38	7161.12	21187.27	0.03	0.04	0.04	0.09	11%	3%
42	2022-10-11	2022-10-18	118.03	127.43	245.46	7279.15	21432.73	0.04	0.05	0.05	0.11	14%	3%
43	2022-10-18	2022-10-25	189.56	224.51	414.07	7468.71	21846.80	0.07	0.08	0.07	0.18	23%	5%
44	2022-10-25	2022-11-01	246.51	299.47	545.98	7715.22	22392.78	0.09	0.11	0.10	0.24	29%	7%
45	2022-11-01	2022-11-08	230.45	340.53	570.98	7945.67	22963.76	0.08	0.10	0.09	0.22	27%	7%
46	2022-11-08	2022-11-15	176.82	258.83	435.65	8122.49	23399.41	0.06	0.08	0.07	0.17	21%	6%
47	2022-11-15	2022-11-22	101.06	157.67	258.73	8223.55	23658.14	0.04	0.04	0.04	0.10	12%	3%
48	2022-11-22	2022-11-29	104.09	1397.17	1501.26	8327.64	25159.40	0.06	0.06	0.06	0.13	12%	19%
49	2022-11-29	2022-12-06	106.69	350.70	457.39	8434.33	25616.79	0.04	0.05	0.04	0.11	13%	6%
50	2022-12-06	2022-12-13	142.16	310.26	452.42	8576.49	26069.21	0.05	0.06	0.06	0.14	17%	6%
51	2022-12-13	2022-12-20	145.88	190.30	336.18	8722.37	26405.39	0.05	0.06	0.06	0.14	17%	4%
52	2022-12-20	2022-12-27	71.45	89.46	160.91	8793.82	26566.30	0.03	0.03	0.03	0.07	9%	2%
53	2022-12-27	2023-01-03	22.12	1.86	23.98	8815.94	26590.28	0.01	0.01	0.01	0.02	3%	0%
	Annual Total		8815.94	17774.34	26590.28								
	Weekly Average		166.34	335.36	501.70			0.06	0.07	0.07	0.16		

		Limit (Bq/a)	% Limit (2021)
% Annual Release Limit:	HTO	6.72E+13	13.12
	HTO + HT	4.48E+14	5.94

	Average % DRL			
	Projected Dose (uSv/a)			
	0.62	0.73	0.66	1.63
	1 year old	10 year old	Adult Resident	Adult Worker
Derived Weekly HTO Release/Emission Limit (GBq/week)	2.90E+05	2.45E+05	2.71E+05	1.08E+05
Derived Weekly HT Release/ Emission Limit (GBq/week)	7.24E+06	6.83E+06	6.90E+06	3.63E+06


Weekly Gaseous Effluent: HTO 2022
Tritium Released (GBq)
1,000
900
800
700
600
500
400
300
200
100
0
Highest Weekly Release
468 GBq
(June 14-21, 2022)
1 3 5 7 9 11 13 15 17 19 21 23 25 27 29 31 33 35 37 39 41 43 45 47 49 51 53
Week
HTO
Action Level


Weekly Gaseous Effluent: Total Tritium 2022
Tritium Released (GBq)
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
1 3 5 7 9 11 13 15 17 19 21 23 25 27 29 31 33 35 37 39 41 43 45 47 49 51 53
Week
Highest Weekly Release
1,501 GBq
(Nov. 22-29, 2022)
Total Tritium (HTO+HT)
Action Level - Total Tritium

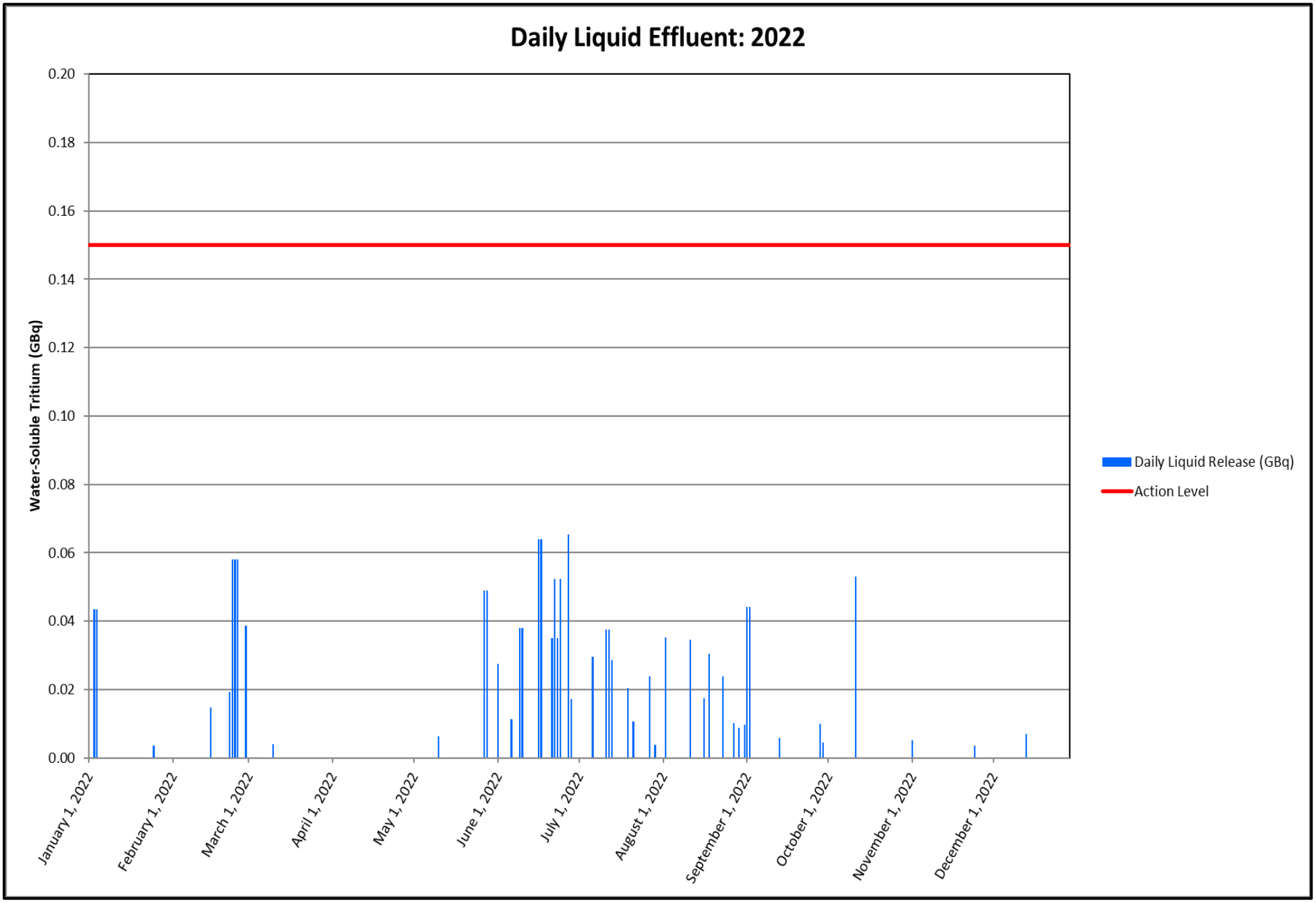
APPENDIX P

Liquid Effluent Data

Liquid Effluent Data

ANNUAL LIQUID EFFLUENT DATA		
2022		
WEEK ENDING	**WEEKLY RELEASE (Bq)**	**WEEK**
9-Jan-22	87,156,480	1
16-Jan-22	0	2
23-Jan-22	0	3
30-Jan-22	3,538,687	4
6-Feb-22	0	5
13-Feb-22	0	6
20-Feb-22	14,699,603	7
27-Feb-22	193,807,530	8
6-Mar-22	38,761,506	9
13-Mar-22	3,959,790	10
20-Mar-22	0	11
27-Mar-22	0	12
3-Apr-22	0	13
10-Apr-22	0	14
17-Apr-22	0	15
24-Apr-22	0	16
1-May-22	0	17
8-May-22	0	18
15-May-22	6,345,910	19
22-May-22	0	20
29-May-22	97,956,804	21
5-Jun-22	27,394,400	22
12-Jun-22	87,568,493	23
19-Jun-22	128,143,620	24
26-Jun-22	174,566,800	25
3-Jul-22	82,691,440	26
10-Jul-22	29,690,553	27
17-Jul-22	103,699,341	28
24-Jul-22	31,071,480	29
31-Jul-22	27,570,280	30
7-Aug-22	35,227,500	31
14-Aug-22	34,572,267	32
21-Aug-22	47,963,793	33
28-Aug-22	33,853,600	34
4-Sep-22	106,766,160	35
11-Sep-22	172,500	36
18-Sep-22	5,926,923	37
25-Sep-22	0	38
2-Oct-22	14,370,630	39
9-Oct-22	0	40
16-Oct-22	53,072,360	41
23-Oct-22	0	42
30-Oct-22	0	43
6-Nov-22	5,088,500	44
13-Nov-22	0	45
20-Nov-22	0	46
27-Nov-22	3,511,433	47
4-Dec-22	0	48
11-Dec-22	100,147	49
18-Dec-22	7,020,053	50
25-Dec-22	0	51
1-Jan-23	0	52
Annual Total (Bq)	1,486,268,583	
Annual Total (GBq)	1.49	
Licence Limit (GBq)	200	
% of limit	**0.74%**	

Liquid Effluent Data



APPENDIX P

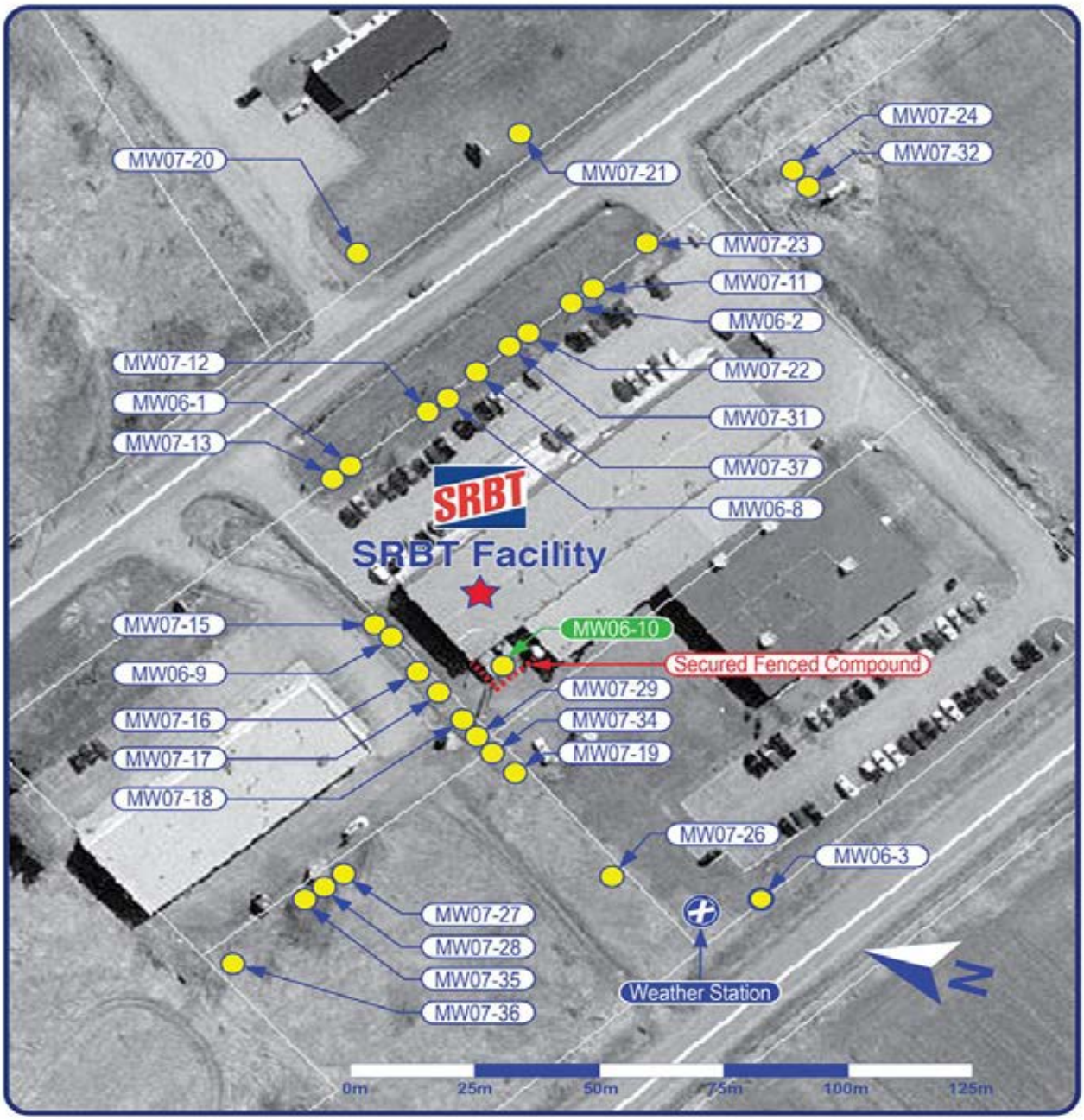
APPENDIX Q

Groundwater Monitoring Well Level Data

Groundwater Monitoring Well Level Data

Well ID	Well Location and Characteristics							2022 Well Level Measurements (masl)			
	Easting	Northing	TOP Elevation (m)	GS Elevation (m)	Well Diameter (m)	Well Depth (m)	Stick-up (m)	Mar. 8	Jun. 6	Sep. 6	Dec. 12
MW06-1	335449	5074615	130.99	130.17	0.051	5.165	0.820	127.61	128.99	128.74	128.55
MW06-2	335478	5074578	130.03	129.24	0.051	5.330	0.788	126.21	128.15	127.53	127.89
MW06-3	335363	5074535	133.09	132.32	0.051	6.130	0.767	127.03	130.11	128.70	128.19
MW06-8	335464	5074590	130.30	129.58	0.032	6.700	0.720	125.26	128.09	127.23	127.12
MW06-9	335401	5074605	131.15	129.86	0.032	5.930	1.290	126.13	129.39	128.67	128.31
MW06-10	335408	5074506	131.32	130.24	0.032	7.770	1.077	126.31	129.36	128.26	127.87
MW07-11	335478	5074576	130.06	129.15	0.032	7.215	0.905	125.44	128.08	127.26	127.17
MW07-12	335465	5074588	130.41	129.58	0.032	7.450	0.835	125.33	128.10	127.21	127.07
MW07-13	335448	5074616	130.92	130.03	0.032	6.615	0.893	125.40	128.27	127.14	126.92
MW07-15	335403	5074605	130.84	129.93	0.032	7.230	0.910	126.33	129.32	128.35	127.93
MW07-16	335393	5074599	130.98	130.16	0.032	7.050	0.822	126.21	129.30	128.25	127.73
MW07-17	335392	5074599	131.08	130.16	0.051	14.610	0.915	121.26	124.89	122.49	122.60
MW07-18	335387	5074595	131.23	130.37	0.032	7.250	0.868	126.22	129.51	128.20	127.78
MW07-19	335378	5074587	131.61	130.79	0.032	7.400	0.815	126.27	129.61	128.34	127.91
MW07-20	335296	5074616	130.70	129.85	0.032	7.820	0.850	123.85	127.54	126.41	126.01
MW07-21	335522	5074584	129.51	128.78	0.032	7.580	0.730	123.48	127.16	125.68	125.37
MW07-22	335472	5074584	130.25	129.05	0.032	7.465	1.200	125.14	127.97	127.08	126.96
MW07-23	335492	5074560	130.04	129.29	0.032	5.905	0.750	125.96	128.20	127.61	127.68
MW07-24	335519	5074530	129.03	128.22	0.032	6.525	0.810	125.48	127.27	126.70	126.76
MW07-26	335357	5074567	132.42	131.85	0.032	7.310	0.570	125.91	129.93	128.00	127.62
MW07-27	335354	5074611	132.89	132.02	0.032	8.330	0.870	125.59	129.36	127.49	127.03
MW07-28	335352	5074612	132.71	132.04	0.032	14.400	0.670	121.36	124.76	122.54	122.73
MW07-29	335384	5074592	131.09	130.57	0.032	13.000	0.520	121.24	124.73	122.44	122.73
MW07-31	335471	5074583	130.16	129.38	0.032	13.240	0.780	120.31	124.63	120.83	121.38
MW07-32	335517	5074530	128.86	128.23	0.032	13.090	0.630	120.32	124.62	120.81	121.36
MW07-34	335393	5074591	131.12	130.71	0.032	9.110	0.410	125.14	128.45	126.82	126.44
MW07-35	335354	5074613	132.89	132.16	0.032	9.390	0.730	125.26	129.00	127.04	126.69
MW07-36	335338	5074629	133.10	132.31	0.032	9.330	0.790	124.71	128.08	126.75	125.50
MW07-37	335468	5074589	130.06	129.47	0.032	8.590	0.590	125.47	128.23	127.34	127.22

Groundwater Monitoring Well Locations

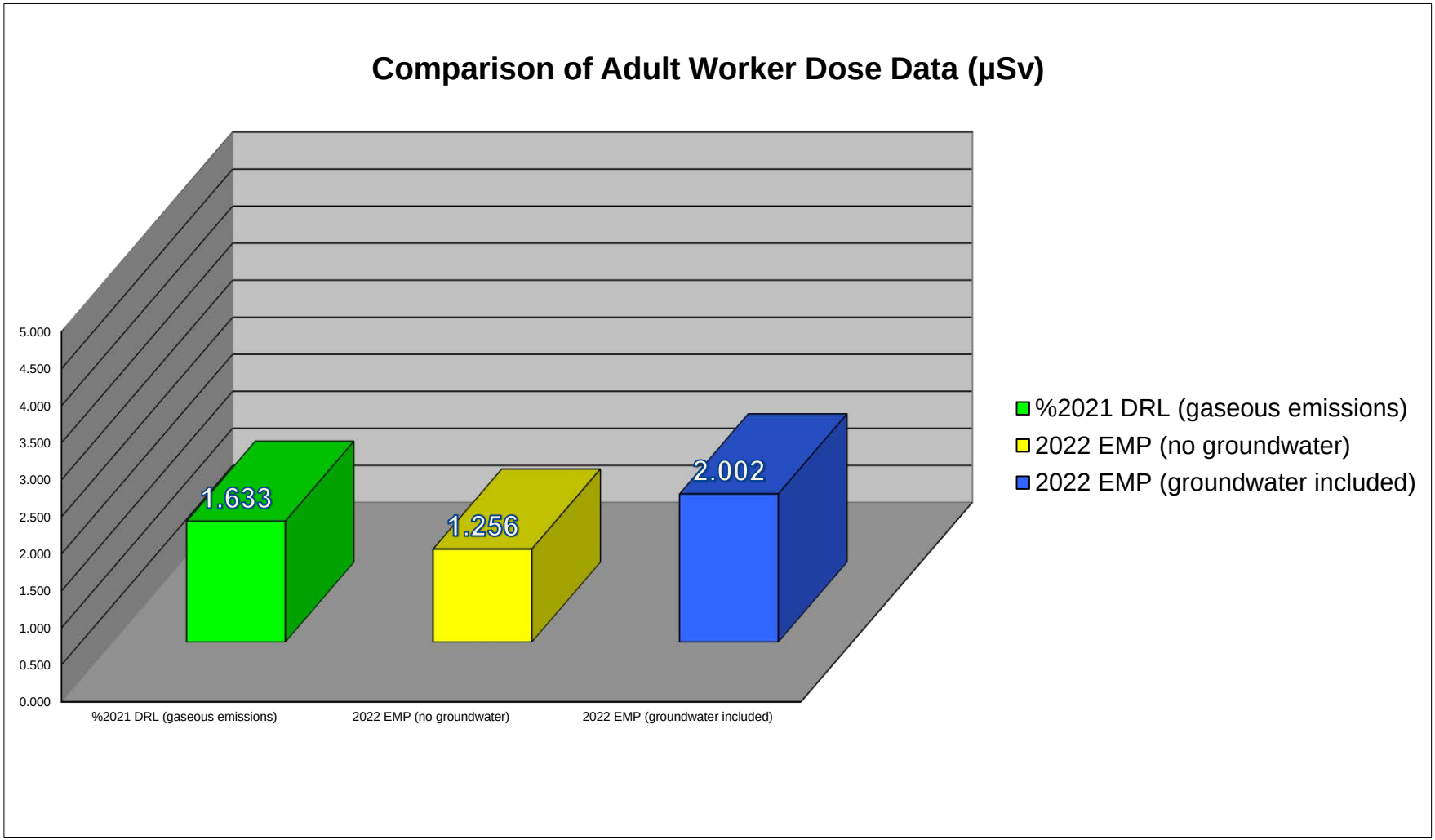


APPENDIX R

Public Dose Data

Public Dose Data
ADULT WORKER

Dose Calculation	2022 µSv
%2021 DRL (gaseous emissions)	1.633
2022 EMP (no groundwater)	1.256
2022 EMP (groundwater included)	2.002



Public Dose Data
ADULT WORKER

Stack Emissions

	2022 Emissions as %2021 SRBT DRL	
	ADULT WORKER	
Sample End	% weekly DRL	(uSv)
2022-01-04	0.02	0.0032
2022-01-11	0.07	0.0131
2022-01-18	0.05	0.0095
2022-01-25	0.08	0.0145
2022-02-01	0.07	0.0133
2022-02-08	0.07	0.0130
2022-02-15	0.08	0.0148
2022-02-22	0.09	0.0178
2022-03-01	0.06	0.0120
2022-03-08	0.08	0.0153
2022-03-15	0.11	0.0200
2022-03-22	0.11	0.0209
2022-03-29	0.06	0.0121
2022-04-05	0.09	0.0163
2022-04-12	0.10	0.0191
2022-04-19	0.07	0.0135
2022-04-26	0.08	0.0149
2022-05-03	0.14	0.0271
2022-05-10	0.16	0.0303
2022-05-17	0.23	0.0431
2022-05-24	0.25	0.0476
2022-05-31	0.23	0.0440
2022-06-07	0.38	0.0711
2022-06-14	0.32	0.0603
2022-06-21	0.45	0.0847
2022-06-28	0.26	0.0495
2022-07-05	0.19	0.0367
2022-07-12	0.26	0.0499
2022-07-19	0.25	0.0470
2022-07-26	0.32	0.0611
2022-08-02	0.26	0.0494
2022-08-09	0.25	0.0463
2022-08-16	0.28	0.0522
2022-08-23	0.24	0.0455
2022-08-30	0.24	0.0455
2022-09-06	0.18	0.0339
2022-09-13	0.25	0.0467
2022-09-20	0.21	0.0389
2022-09-27	0.19	0.0352
2022-10-04	0.09	0.0176
2022-10-11	0.09	0.0172
2022-10-18	0.11	0.0213
2022-10-25	0.18	0.0343
2022-11-01	0.24	0.0446
2022-11-08	0.22	0.0420
2022-11-15	0.17	0.0322
2022-11-22	0.10	0.0185
2022-11-29	0.13	0.0254
2022-12-06	0.11	0.0205
2022-12-13	0.14	0.0264
2022-12-20	0.14	0.0265
2022-12-27	0.07	0.0129
2023-01-03	0.02	0.0039
Sum (uSv)		**1.633**
Ave. (%DRL)	**0.16**	
Annual Dose Est.	**1.633 uSv/a**	

Public Dose Data
ADULT WORKER
EMP Factors for Dose

Pathways Analysis of Dose to the Public			
		per annum	
Atmospheric HTO inhalation, immersion	P(i)19, P(e)19	0.982	
Surface HTO ingestion	P(i)29	0.746	
Surface HTO immersion	P(e)29	0.000	
External soil exposure	P39	0.000	
Forage & crop ingestion	P49	0.259	
Animal produce ingestion	P59	0.015	
Aquatic animal ingestion	P69	0.000	
Aquatic plant ingestion	P79	0.000	
External sediment exposure	P89	0.000	
Total (uSv)		**2.002**	**uSv/a**
Total without P_{29} (uSv)		**1.256**	**uSv/a**

Public Dose Data
ADULT WORKER
EMP Factors for Dose P19

P19 is the transfer pathway of exposure to HTO from compartment 1 (Atmosphere) to 9 (dose)
P(i)19 is the pathway of exposure due to inhalation of HTO, and also implicitly captures skin absorption dose P(e)19 as per CSA N288.1-14 Table C.1.

Formula:
P(i)19 (uSv) = [HTO]air (Bq/m3) x Inhalation (m3) x DCF (uSv/Bq)

Calculation:

PAS # (#)	P(i)19 (uSv)	[HTO]air (Bq/m^3)	Volume (m^3)	(uSv/Bq)	(uSv/a)	(uSv/a)	(uSv/a)	Maximum (uSv/a)
1	0.344	5.750	1994.496	3.000E-05	0.344			
2	0.286	4.780	1994.496	3.000E-05		0.286		
3	0.000			3.000E-05				
4	0.638	3.320	6405.504	3.000E-05	0.638	0.638	0.638	
5	0.000			3.000E-05				
6	0.000			3.000E-05				
7	0.000			3.000E-05				
8	0.000			3.000E-05				
9	0.000			3.000E-05				
10	0.000			3.000E-05				
11	0.000			3.000E-05				
12	0.000			3.000E-05				
13	0.153	2.560	1994.496	3.000E-05			0.153	
			P(i)19	**Sum**	**0.982**	**0.924**	**0.791**	**0.982** **uSv/a**

Public Dose Data
ADULT WORKER
EMP Factors for Dose P29

P29 is the transfer pathway of exposure to HTO from compartment 2 (Surface Water) to 9 (Dose)
P(i)29 is the pathway of exposure due to ingestion of HTO
P(e)29 is the pathway of exposure due to immersion in HTO

Formula:
P(i)29 = [HTO] (Bq/L) x Ingestion (L) x DCF (uSv/Bq)

Well	P(i)29 (uSv/a)	[HTO]well (Bq/L)	Ingestion (L/a)	DCF (uSv/Bq)
2	0.681	31.5	1081.1	2.00E-05
3	0.746	34.5	1081.1	2.00E-05
5	0.130	6.0	1081.1	2.00E-05
6	0.097	4.5	1081.1	2.00E-05
7	0.086	4.0	1081.1	2.00E-05
Avg P(i)29	**0.348**	**uSv/annum**		

Date	Well 2 (Bq/L)	Well 3 (Bq/L)	Well 5 (Bq/L)	Well 6 (Bq/L)	Well 7 (Bq/L)
March 9, 2022	34	31	6	5	4
September 7, 2022	29	38	6	4	4
Average	**31.5**	**34.5**	**6.0**	**4.5**	**4.0**

Well 2	185 Mud Lake Road
Well 3	183 Mud Lake Road
Well 5	171 Sawmill Road
Well 6	40987 Highway 41
Well 7	40925 Highway 41

Well 3	**P(i)29**	**0.746**	**uSv/a**
	P(e)29	**0.000**	**uSv/a**
	P29	**0.746**	**uSv/a**

P(e)29 is the pathway of exposure to HTO due to immersion in surface water, and is negligible.

Public Dose Data
ADULT WORKER
EMP Factors for Dose P49

P49 is the pathway for exposure to HTO due to ingestion of forage and crops.

Produce Sample Results (Bq free water tritium / kg fresh weight)																		
Source	Farm Gate Market 11133 Round Lake Road						Residences											
Type	Tomato	Cucumber	Corn	Onion	Beet	Average	LOCATION	Tomato	Onion	Apple	Herb	Carrot	Bean	Cucumb.	Asparag.	Zucch.	Average
	3	3	3	3	3	3.0	408 BOUNDARY ROAD	99	44								71.5
							413 SWEEZEY COURT			63	21						42.0
							611 MOSS DRIVE	71				36					53.5
							171 SAWMILL ROAD	6				4	5	5			5.0
							632 JOHNSON CRES.	43							28	30	33.7
Average						3.0		55	44	63	21	20	5	5	28	30	17.0
Produce Sample Results (Bq organically bound tritium / kg fresh weight)																		
OBT	2					2.0	408 BOUNDARY ROAD	6		7								6.5

Produce Consumption						
100%=	413.300	kg/a	[HTO] (Bq/kg)	(Bq/a)	[OBT] (Bq/kg)	(Bq/a)
70%	289.310	kg/a	3.0	867.93	2.0	578.62
30%	123.990	kg/a	71.5	8865.29	6.5	805.94

P49 = [HTO or OBT]produce (Bq/kg) x Produce Ingested (kg/mo) x DCF (uSv/Bq)

P49 (uSv/a)	[HTO] pro (Bq/a)	DCF (uSv/Bq)	[OBT] pro (Bq/a)	DCF (uSv/Bq)
0.259	9733.22	2.00E-05	1384.56	4.60E-05

P49	0.259	uSv/a

Public Dose Data
ADULT WORKER
EMP Factors for Dose P59

P59 is the exposure to HTO due to ingestion of animal produce.

2022 Sample Results

Local Producer	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

Local Distributor	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

TOTAL AVERAGE	**4.00**	Bq/L

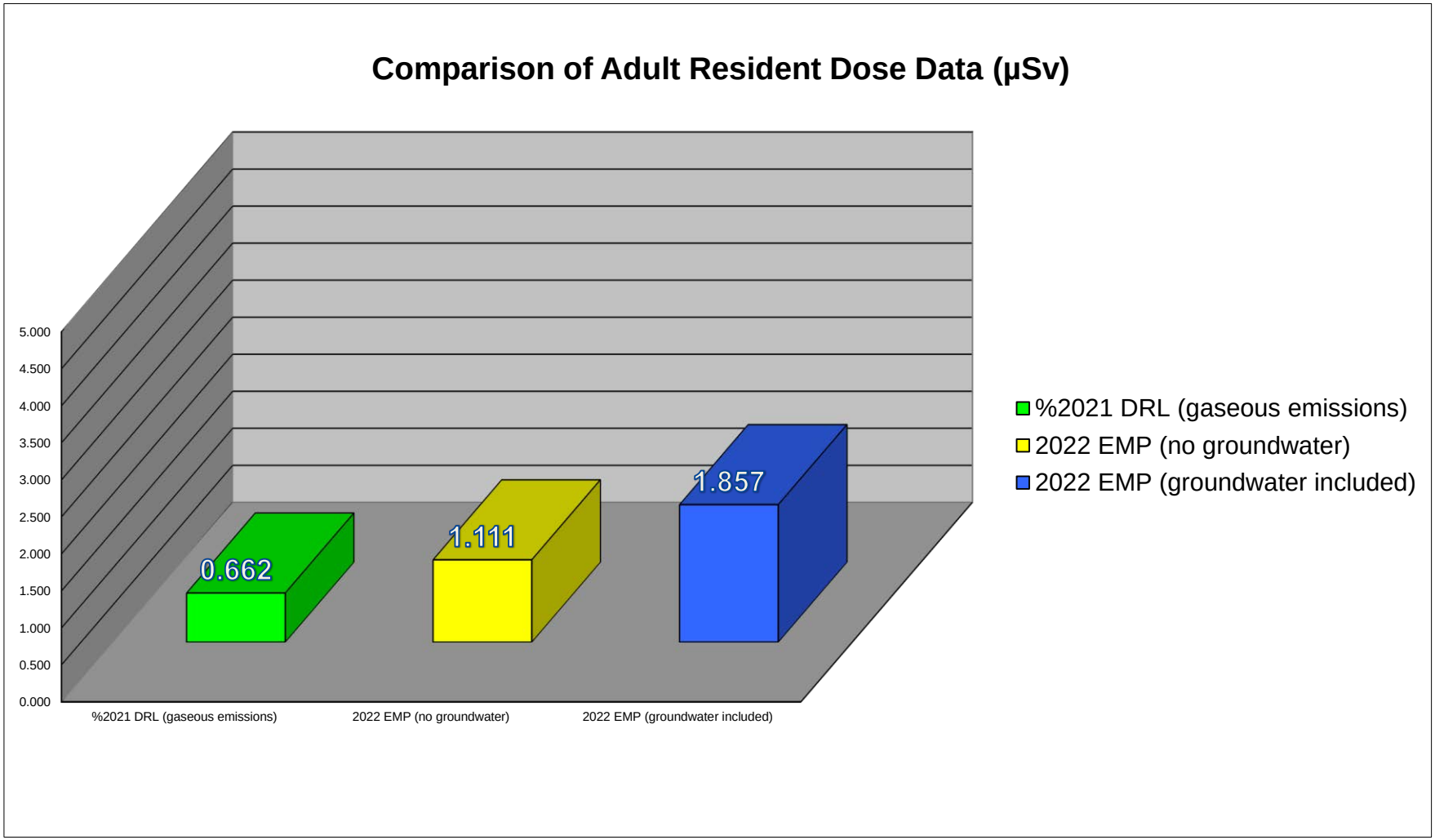
Milk Density Adjustment		
Milk Average (Bq/L) x Milk density (L/kg)		
Bq/L	**L/kg**	**Bq/kg**
4.00	0.97	**3.880**

Consumption		
kg/da x da/a = kg/a		
(kg/da)	**(da/a)**	**(kg/a)**
0.516	365.25	**188.5**

P59 = [HTO]animal produce (Bq/kg) x Ingestion (kg) x DCF			
P59	**[HTO]**	**Ingested**	**DCF**
(uSv/a)	**(Bq/kg)**	**(kg/a)**	**(uSv/Bq)**
0.015	**3.88**	**188.5**	2.00E-05

Public Dose Data
ADULT RESIDENT

Dose Calculation	2022 µSv
%2021 DRL (gaseous emissions)	0.662
2022 EMP (no groundwater)	1.111
2022 EMP (groundwater included)	1.857



Public Dose Data
ADULT RESIDENT

Stack Emissions

	2022 Emissions as %2021 SRBT DRL	
	ADULT RESIDENT	
Sample End	% weekly DRL	(uSv)
2022-01-04	0.01	0.0013
2022-01-11	0.03	0.0054
2022-01-18	0.02	0.0039
2022-01-25	0.03	0.0060
2022-02-01	0.03	0.0055
2022-02-08	0.03	0.0053
2022-02-15	0.03	0.0060
2022-02-22	0.04	0.0072
2022-03-01	0.03	0.0050
2022-03-08	0.03	0.0064
2022-03-15	0.04	0.0082
2022-03-22	0.05	0.0085
2022-03-29	0.03	0.0049
2022-04-05	0.04	0.0068
2022-04-12	0.04	0.0078
2022-04-19	0.03	0.0055
2022-04-26	0.03	0.0061
2022-05-03	0.06	0.0110
2022-05-10	0.07	0.0123
2022-05-17	0.09	0.0177
2022-05-24	0.10	0.0192
2022-05-31	0.09	0.0178
2022-06-07	0.15	0.0285
2022-06-14	0.13	0.0243
2022-06-21	0.18	0.0341
2022-06-28	0.11	0.0200
2022-07-05	0.08	0.0149
2022-07-12	0.11	0.0201
2022-07-19	0.10	0.0190
2022-07-26	0.13	0.0251
2022-08-02	0.11	0.0199
2022-08-09	0.10	0.0186
2022-08-16	0.11	0.0211
2022-08-23	0.10	0.0184
2022-08-30	0.10	0.0185
2022-09-06	0.07	0.0136
2022-09-13	0.10	0.0188
2022-09-20	0.08	0.0157
2022-09-27	0.08	0.0143
2022-10-04	0.04	0.0072
2022-10-11	0.04	0.0070
2022-10-18	0.05	0.0086
2022-10-25	0.07	0.0138
2022-11-01	0.10	0.0180
2022-11-08	0.09	0.0170
2022-11-15	0.07	0.0130
2022-11-22	0.04	0.0075
2022-11-29	0.06	0.0111
2022-12-06	0.04	0.0084
2022-12-13	0.06	0.0107
2022-12-20	0.06	0.0107
2022-12-27	0.03	0.0052
2023-01-03	0.01	0.0015
Sum (uSv)		**0.662**
Ave. (%DRL)	**0.07**	
Annual Dose Est.	**0.662 uSv/a**	

Public Dose Data
ADULT RESIDENT
EMP Factors for Dose

Pathways Analysis of Dose to the Public			
		per annum	
Atmospheric HTO inhalation, immersion	P(i)19, P(e)19	0.837	
Surface HTO ingestion	P(i)29	0.746	
Surface HTO immersion	P(e)29	0.000	
External soil exposure	P39	0.000	
Forage & crop ingestion	P49	0.259	
Animal produce ingestion	P59	0.015	
Aquatic animal ingestion	P69	0.000	
Aquatic plant ingestion	P79	0.000	
External sediment exposure	P89	0.000	
Total (uSv)		**1.857**	**uSv/a**
Total without P_{29} (uSv)		**1.111**	**uSv/a**

Public Dose Data
ADULT RESIDENT
EMP Factors for Dose P19

P19 is the transfer pathway of exposure to HTO from compartment 1 (Atmosphere) to 9 (dose)
P(i)19 is the pathway of exposure due to inhalation of HTO, and also implicitly captures skin absorption dose P(e)19 as per CSA N288.1-14 Table C.1.

Formula:
P(i)19 (uSv) = [HTO]air (Bq/m3) x Inhalation (m3) x DCF (uSv/Bq)

Calculation:

PAS # (#)	P(i)19 (uSv)	[HTO]air (Bq/m^3)	Volume (m^3)	(uSv/Bq)	(uSv/a)	(uSv/a)	(uSv/a)	Maximum (uSv/a)	
1	0.000			3.000E-05					
2	0.000			3.000E-05					
3	0.000			3.000E-05					
4	0.837	3.320	8400.000	3.000E-05	0.837	0.837	0.837		
5	0.000			3.000E-05					
6	0.000			3.000E-05					
7	0.000			3.000E-05					
8	0.000			3.000E-05					
9	0.000			3.000E-05					
10	0.000			3.000E-05					
11	0.000			3.000E-05					
12	0.000			3.000E-05					
13	0.000			3.000E-05					
			P(i)19	**Sum**	**0.837**	**0.837**	**0.837**	**0.837**	**uSv/a**

Public Dose Data
ADULT RESIDENT
EMP Factors for Dose P29

P29 is the transfer pathway of exposure to HTO from compartment 2 (Surface Water) to 9 (Dose)
P(i)29 is the pathway of exposure due to ingestion of HTO
P(e)29 is the pathway of exposure due to immersion in HTO

Formula:
P(i)29 = [HTO] (Bq/L) x Ingestion (L) x DCF (uSv/Bq)

Well	P(i)29 (uSv/a)	[HTO]well (Bq/L)	Ingestion (L/a)	DCF (uSv/Bq)
2	0.681	31.5	1081.1	2.00E-05
3	0.746	34.5	1081.1	2.00E-05
5	0.130	6.0	1081.1	2.00E-05
6	0.097	4.5	1081.1	2.00E-05
7	0.086	4.0	1081.1	2.00E-05
Avg P(i)29	**0.348**	**uSv/annum**		

Date	Well 2 (Bq/L)	Well 3 (Bq/L)	Well 5 (Bq/L)	Well 6 (Bq/L)	Well 7 (Bq/L)
March 9, 2022	34	31	6	5	4
September 7, 2022	29	38	6	4	4
Average	**31.5**	**34.5**	**6.0**	**4.5**	**4.0**

Well 2	185 Mud Lake Road
Well 3	183 Mud Lake Road
Well 5	171 Sawmill Road
Well 6	40987 Highway 41
Well 7	40925 Highway 41

Well 3	**P(i)29**	**0.746**	**uSv/a**
	P(e)29	**0.000**	**uSv/a**
	P29	**0.746**	**uSv/a**

P(e)29 is the pathway of exposure to HTO due to immersion in surface water, and is negligible.

Public Dose Data
ADULT RESIDENT
EMP Factors for Dose P49

P49 is the pathway for exposure to HTO due to ingestion of forage and crops.

Produce Sample Results (Bq free water tritium / kg fresh weight)																		
Source	**Farm Gate Market 11133 Round Lake Road**							**Residences**										
Type	**Tomato**	**Cucumber**	**Corn**	**Onion**	**Beet**	**Average**		**LOCATION**	**Tomato**	**Onion**	**Apple**	**Herb**	**Carrot**	**Bean**	**Cucumb.**	**Asparag.**	**Zucch.**	**Average**
	3	3	3	3	3	**3.0**		408 BOUNDARY ROAD	99	44								**71.5**
								413 SWEEZEY COURT			63	21						42.0
								611 MOSS DRIVE	71				36					53.5
								171 SAWMILL ROAD	6				4	5	5			5.0
								632 JOHNSON CRES.	43							28	30	33.7
Average						3.0			55	44	63	21	20	5	5	28	30	17.0
Produce Sample Results (Bq organically bound tritium / kg fresh weight)																		
OBT	2					**2.0**		408 BOUNDARY ROAD	6		7							**6.5**

Produce Consumption						
100%=	**413.300**	**kg/a**	**[HTO] (Bq/kg)**	**(Bq/a)**	**[OBT] (Bq/kg)**	**(Bq/a)**
70%	289.310	**kg/a**	3.0	867.93	2.0	578.62
30%	123.990	**kg/a**	71.5	8865.29	6.5	805.94

P49 = [HTO or OBT]produce (Bq/kg) x Produce Ingested (kg/mo) x DCF (uSv/Bq)

P49 (uSv/a)	**[HTO] pro (Bq/a)**	**DCF (uSv/Bq)**	**[OBT] pro (Bq/a)**	**DCF (uSv/Bq)**
0.259	**9733.22**	2.00E-05	**1384.56**	4.60E-05

P49	**0.259**	**uSv/a**

Public Dose Data
ADULT RESIDENT
EMP Factors for Dose P59

P59 is the exposure to HTO due to ingestion of animal produce.

2022 Sample Results

Local Producer	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

Local Distributor	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

TOTAL AVERAGE	**4.00**	Bq/L

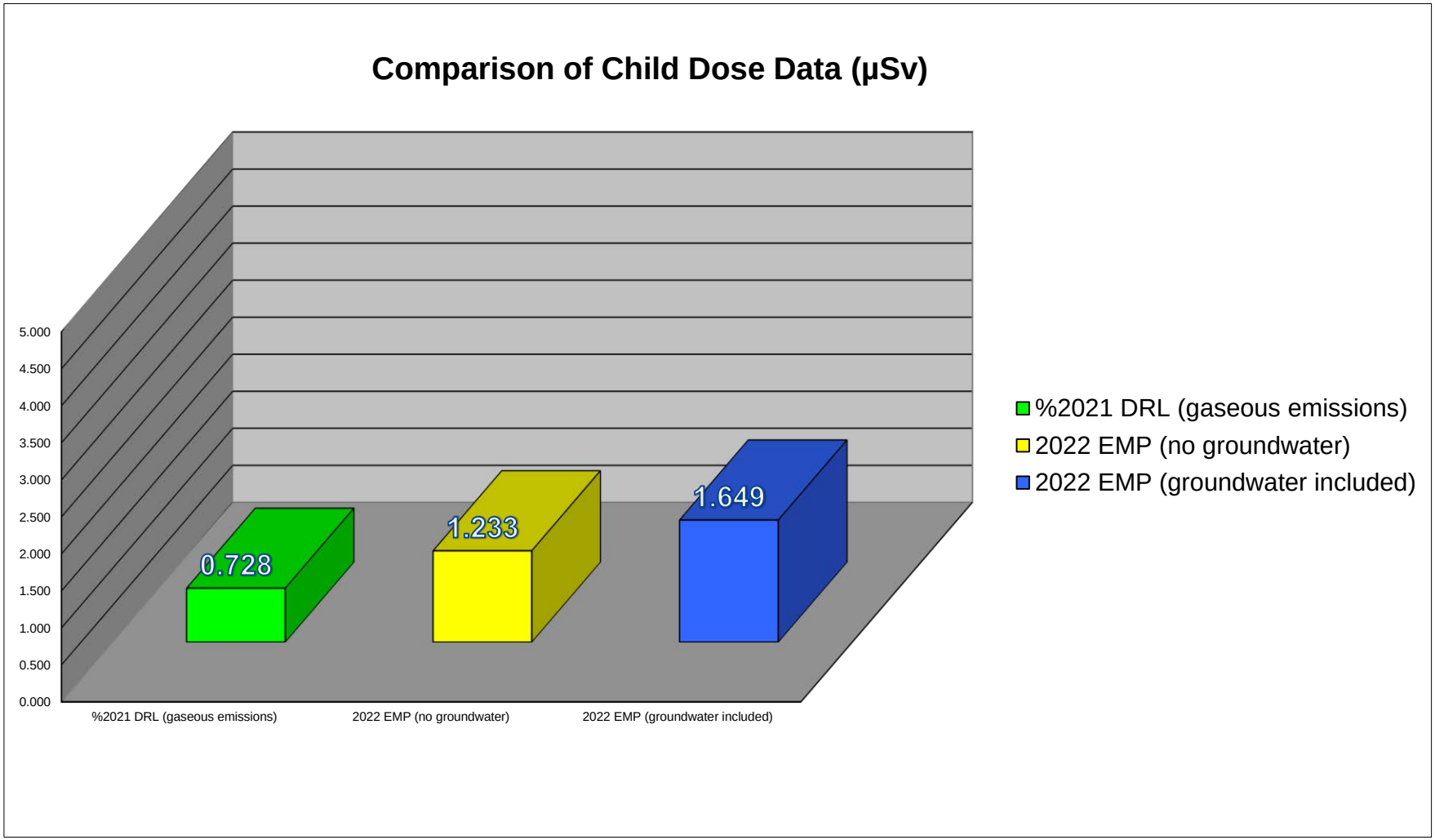
Milk Density Adjustment		
Milk Average (Bq/L) x Milk density (L/kg)		
Bq/L	**L/kg**	**Bq/kg**
4.00	0.97	**3.880**

Consumption		
kg/da x da/a = kg/a		
(kg/da)	**(da/a)**	**(kg/a)**
0.516	365.25	**188.5**

P59 = [HTO]animal produce (Bq/kg) x Ingestion (kg) x DCF			
P59	**[HTO]**	**Ingested**	**DCF**
(uSv/a)	**(Bq/kg)**	**(kg/a)**	**(uSv/Bq)**
0.015	**3.88**	**188.5**	2.00E-05

Public Dose Data
CHILD - 10 YEAR OLD

Dose Calculation	2022 µSv
%2021 DRL (gaseous emissions)	0.728
2022 EMP (no groundwater)	1.233
2022 EMP (groundwater included)	1.649



Public Dose Data
CHILD - 10 YEAR OLD

Stack Emissions

	2022 Emissions as %2021 SRBT DRL	
	CHILD - 10 YEAR OLD	
Sample End	% weekly DRL	(uSv)
2022-01-04	0.01	0.0014
2022-01-11	0.03	0.0059
2022-01-18	0.02	0.0043
2022-01-25	0.03	0.0065
2022-02-01	0.03	0.0060
2022-02-08	0.03	0.0058
2022-02-15	0.04	0.0066
2022-02-22	0.04	0.0079
2022-03-01	0.03	0.0054
2022-03-08	0.04	0.0069
2022-03-15	0.05	0.0090
2022-03-22	0.05	0.0093
2022-03-29	0.03	0.0054
2022-04-05	0.04	0.0074
2022-04-12	0.05	0.0085
2022-04-19	0.03	0.0060
2022-04-26	0.04	0.0066
2022-05-03	0.06	0.0121
2022-05-10	0.07	0.0135
2022-05-17	0.10	0.0194
2022-05-24	0.11	0.0211
2022-05-31	0.10	0.0196
2022-06-07	0.17	0.0315
2022-06-14	0.14	0.0267
2022-06-21	0.20	0.0376
2022-06-28	0.12	0.0220
2022-07-05	0.09	0.0164
2022-07-12	0.12	0.0222
2022-07-19	0.11	0.0209
2022-07-26	0.15	0.0274
2022-08-02	0.12	0.0219
2022-08-09	0.11	0.0205
2022-08-16	0.12	0.0232
2022-08-23	0.11	0.0202
2022-08-30	0.11	0.0203
2022-09-06	0.08	0.0150
2022-09-13	0.11	0.0207
2022-09-20	0.09	0.0173
2022-09-27	0.08	0.0157
2022-10-04	0.04	0.0079
2022-10-11	0.04	0.0077
2022-10-18	0.05	0.0094
2022-10-25	0.08	0.0152
2022-11-01	0.11	0.0198
2022-11-08	0.10	0.0187
2022-11-15	0.08	0.0143
2022-11-22	0.04	0.0082
2022-11-29	0.06	0.0119
2022-12-06	0.05	0.0092
2022-12-13	0.06	0.0118
2022-12-20	0.06	0.0118
2022-12-27	0.03	0.0057
2023-01-03	0.01	0.0017
Sum (uSv)		**0.728**
Ave. (%DRL)	**0.07**	
Annual Dose Est.	**0.728 uSv/a**	

Public Dose Data
CHILD - 10 YEAR OLD
EMP Factors for Dose

Pathways Analysis of Dose to the Public			
		per annum	
Atmospheric HTO inhalation, immersion	P(i)19, P(e)19	0.990	
Surface HTO ingestion	P(i)29	0.416	
Surface HTO immersion	P(e)29	0.000	
External soil exposure	P39	0.000	
Forage & crop ingestion	P49	0.212	
Animal produce ingestion	P59	0.031	
Aquatic animal ingestion	P69	0.000	
Aquatic plant ingestion	P79	0.000	
External sediment exposure	P89	0.000	
Total (uSv)		**1.649**	**uSv/a**
Total without P_{29} (uSv)		**1.233**	**uSv/a**

Public Dose Data
CHILD - 10 YEAR OLD
EMP Factors for Dose P19

P19 is the transfer pathway of exposure to HTO from compartment 1 (Atmosphere) to 9 (dose)
P(i)19 is the pathway of exposure due to inhalation of HTO, and also implicitly captures skin absorption dose P(e)19 as per CSA N288.1-14 Table C.1.

Formula:
P(i)19 (uSv) = [HTO]air (Bq/m3) x Inhalation (m3) x DCF (uSv/Bq)

Calculation:

PAS # (#)	P(i)19 (uSv)	[HTO]air (Bq/m^3)	Volume (m^3)	(uSv/Bq)	(uSv/a)	(uSv/a)	(uSv/a)	Maximum (uSv/a)	
1	0.000			3.800E-05					
2	0.000			3.800E-05					
3	0.000			3.800E-05					
4	0.990	3.320	7850.000	3.800E-05	0.990	0.990	0.990		
5	0.000			3.800E-05					
6	0.000			3.800E-05					
7	0.000			3.800E-05					
8	0.000			3.800E-05					
9	0.000			3.800E-05					
10	0.000			3.800E-05					
11	0.000			3.800E-05					
12	0.000			3.800E-05					
13	0.000			3.800E-05					
			P(i)19	Sum	0.990	0.990	0.990	0.990	uSv/a

Public Dose Data
CHILD - 10 YEAR OLD
EMP Factors for Dose P29

P29 is the transfer pathway of exposure to HTO from compartment 2 (Surface Water) to 9 (Dose)
P(i)29 is the pathway of exposure due to ingestion of HTO
P(e)29 is the pathway of exposure due to immersion in HTO

Formula:
P(i)29 = [HTO] (Bq/L) x Ingestion (L) x DCF (uSv/Bq)

Well	P(i)29 (uSv/a)	[HTO]well (Bq/L)	Ingestion (L/a)	DCF (uSv/Bq)
2	0.380	31.5	482.1	2.50E-05
3	0.416	34.5	482.1	2.50E-05
5	0.072	6.0	482.1	2.50E-05
6	0.054	4.5	482.1	2.50E-05
7	0.048	4.0	482.1	2.50E-05
Avg P(i)29	**0.194**	**uSv/annum**		

Date	Well 2 (Bq/L)	Well 3 (Bq/L)	Well 5 (Bq/L)	Well 6 (Bq/L)	Well 7 (Bq/L)
March 9, 2022	34	31	6	5	4
September 7, 2022	29	38	6	4	4
Average	**31.5**	**34.5**	**6.0**	**4.5**	**4.0**

Well 2	185 Mud Lake Road
Well 3	183 Mud Lake Road
Well 5	171 Sawmill Road
Well 6	40987 Highway 41
Well 7	40925 Highway 41

Well 3	**P(i)29**	**0.416**	**uSv/a**
	P(e)29	**0.000**	**uSv/a**
	P29	**0.416**	**uSv/a**

P(e)29 is the pathway of exposure to HTO due to immersion in surface water, and is negligible.

Public Dose Data
CHILD - 10 YEAR OLD
EMP Factors for Dose P49

P49 is the pathway for exposure to HTO due to ingestion of forage and crops.

Produce Sample Results (Bq free water tritium / kg fresh weight)

Source	Farm Gate Market 11133 Round Lake Road						Residences									
Type	Tomato	Cucumber	Corn	Onion	Beet	Average	LOCATION	Tomato	Onion	Apple	Herb	Carrot	Bean	Cucumb.	Asparag.	Zucch.	Average
	3	3	3	3	3	**3.0**	408 BOUNDARY ROAD	99	44								**71.5**
							413 SWEEZEY COURT			63	21						42.0
							611 MOSS DRIVE	71				36					53.5
							171 SAWMILL ROAD	6				4	5	5			5.0
							632 JOHNSON CRES.	43							28	30	33.7
Average						3.0		55	44	63	21	20	5	5	28	30	17.0

Produce Sample Results (Bq organically bound tritium / kg fresh weight)

OBT	2					**2.0**	408 BOUNDARY ROAD	6		7							**6.5**

Produce Consumption

100%=	**265.200**	**kg/a**	**[HTO] (Bq/kg)**	**(Bq/a)**	**[OBT] (Bq/kg)**	**(Bq/a)**
70%	185.640	**kg/a**	3.0	556.92	2.0	371.28
30%	79.560	**kg/a**	71.5	5688.54	6.5	517.14

P49 = [HTO or OBT]produce (Bq/kg) x Produce Ingested (kg/mo) x DCF (uSv/Bq)

P49 (uSv/a)	[HTO] pro (Bq/a)	DCF (uSv/Bq)	[OBT] pro (Bq/a)	DCF (uSv/Bq)
0.212	**6245.46**	2.50E-05	**888.42**	6.30E-05

P49	**0.212**	**uSv/a**

Public Dose Data
CHILD - 10 YEAR OLD
EMP Factors for Dose P59

P59 is the exposure to HTO due to ingestion of animal produce.

2022 Sample Results

Local Producer	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

Local Distributor	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

TOTAL AVERAGE	**4.00**	Bq/L

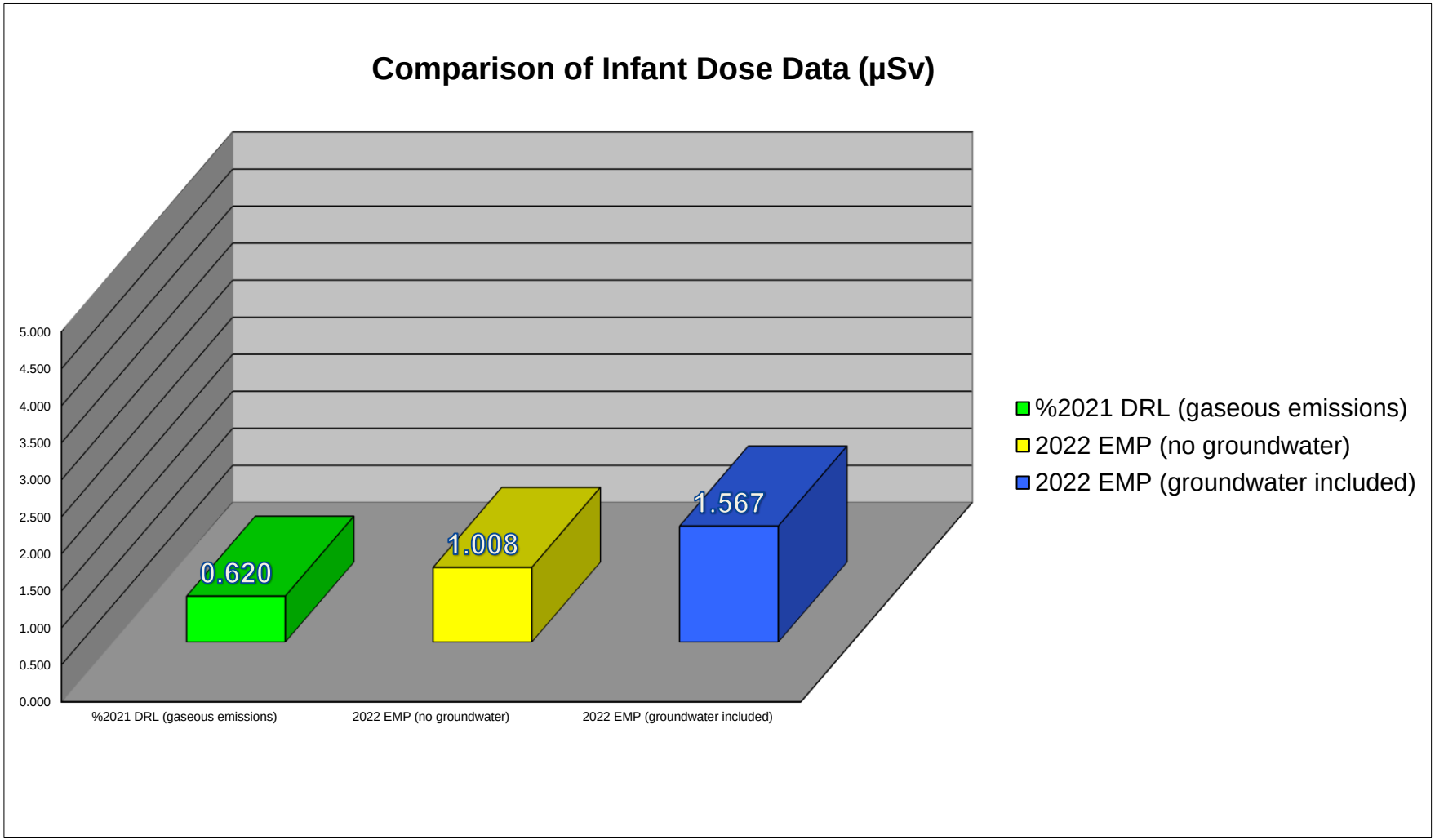
Milk Density Adjustment		
Milk Average (Bq/L) x Milk density (L/kg)		
Bq/L	**L/kg**	**Bq/kg**
4.00	0.97	**3.880**

Consumption		
kg/da x da/a = kg/a		
(kg/da)	**(da/a)**	**(kg/a)**
0.875	365.25	**319.6**

P59 = [HTO]animal produce (Bq/kg) x Ingestion (kg) x DCF			
P59	**[HTO]**	**Ingested**	**DCF**
(uSv/a)	**(Bq/kg)**	**(kg/a)**	**(uSv/Bq)**
0.031	**3.88**	**319.6**	2.50E-05

Public Dose Data
INFANT - 1 YEAR OLD

Dose Calculation	2022 µSv
%2021 DRL (gaseous emissions)	0.620
2022 EMP (no groundwater)	1.008
2022 EMP (groundwater included)	1.567



Public Dose Data
INFANT - 1 YEAR OLD

Stack Emissions

	2022 Emissions as %2021 SRBT DRL	
	INFANT - 1 YEAR OLD	
Sample End	% weekly DRL	(uSv)
2022-01-04	0.01	0.0012
2022-01-11	0.03	0.0050
2022-01-18	0.02	0.0037
2022-01-25	0.03	0.0056
2022-02-01	0.03	0.0052
2022-02-08	0.03	0.0050
2022-02-15	0.03	0.0056
2022-02-22	0.04	0.0067
2022-03-01	0.02	0.0047
2022-03-08	0.03	0.0060
2022-03-15	0.04	0.0077
2022-03-22	0.04	0.0080
2022-03-29	0.02	0.0046
2022-04-05	0.03	0.0064
2022-04-12	0.04	0.0073
2022-04-19	0.03	0.0051
2022-04-26	0.03	0.0057
2022-05-03	0.05	0.0103
2022-05-10	0.06	0.0115
2022-05-17	0.09	0.0166
2022-05-24	0.10	0.0179
2022-05-31	0.09	0.0166
2022-06-07	0.14	0.0267
2022-06-14	0.12	0.0227
2022-06-21	0.17	0.0319
2022-06-28	0.10	0.0187
2022-07-05	0.07	0.0139
2022-07-12	0.10	0.0188
2022-07-19	0.09	0.0178
2022-07-26	0.12	0.0235
2022-08-02	0.10	0.0186
2022-08-09	0.09	0.0174
2022-08-16	0.10	0.0197
2022-08-23	0.09	0.0172
2022-08-30	0.09	0.0173
2022-09-06	0.07	0.0128
2022-09-13	0.09	0.0176
2022-09-20	0.08	0.0147
2022-09-27	0.07	0.0134
2022-10-04	0.04	0.0068
2022-10-11	0.03	0.0065
2022-10-18	0.04	0.0080
2022-10-25	0.07	0.0129
2022-11-01	0.09	0.0168
2022-11-08	0.08	0.0159
2022-11-15	0.06	0.0122
2022-11-22	0.04	0.0070
2022-11-29	0.06	0.0104
2022-12-06	0.04	0.0079
2022-12-13	0.05	0.0101
2022-12-20	0.05	0.0100
2022-12-27	0.03	0.0049
2023-01-03	0.01	0.0014
Sum (uSv)		**0.620**
Ave. (%DRL)	**0.06**	
Annual Dose Est.	**0.620 uSv/a**	

Public Dose Data
INFANT - 1 YEAR OLD
EMP Factors for Dose

Pathways Analysis of Dose to the Public			
		per annum	
Atmospheric HTO inhalation, immersion	P(i)19, P(e)19	0.728	
Surface HTO ingestion	P(i)29	0.559	
Surface HTO immersion	P(e)29	0.000	
External soil exposure	P39	0.000	
Forage & crop ingestion	P49	0.210	
Animal produce ingestion	P59	0.070	
Aquatic animal ingestion	P69	0.000	
Aquatic plant ingestion	P79	0.000	
External sediment exposure	P89	0.000	
Total (uSv)		**1.567**	**uSv/a**
Total without P_{29} (uSv)		**1.008**	**uSv/a**

Public Dose Data
INFANT - 1 YEAR OLD
EMP Factors for Dose P19

P19 is the transfer pathway of exposure to HTO from compartment 1 (Atmosphere) to 9 (dose)
P(i)19 is the pathway of exposure due to inhalation of HTO, and also implicitly captures skin absorption dose P(e)19 as per CSA N288.1-14 Table C.1.

Formula:
P(i)19 (uSv) = [HTO]air (Bq/m3) x Inhalation (m3) x DCF (uSv/Bq)

Calculation:

PAS # (#)	P(i)19 (uSv)	[HTO]air (Bq/m^3)	Volume (m^3)	(uSv/Bq)	(uSv/a)	(uSv/a)	(uSv/a)	Maximum (uSv/a)	
1	0.000			8.000E-05					
2	0.000			8.000E-05					
3	0.000			8.000E-05					
4	0.728	3.320	2740.000	8.000E-05	0.728	0.728	0.728		
5	0.000			8.000E-05					
6	0.000			8.000E-05					
7	0.000			8.000E-05					
8	0.000			8.000E-05					
9	0.000			8.000E-05					
10	0.000			8.000E-05					
11	0.000			8.000E-05					
12	0.000			8.000E-05					
13	0.000			8.000E-05					
			P(i)19	**Sum**	**0.728**	**0.728**	**0.728**	**0.728**	**uSv/a**

Public Dose Data
INFANT - 1 YEAR OLD
EMP Factors for Dose P29

P29 is the transfer pathway of exposure to HTO from compartment 2 (Surface Water) to 9 (Dose)
P(i)29 is the pathway of exposure due to ingestion of HTO
P(e)29 is the pathway of exposure due to immersion in HTO

Formula:
P(i)29 = [HTO] (Bq/L) x Ingestion (L) x DCF (uSv/Bq)

Well	P(i)29 (uSv/a)	[HTO]well (Bq/L)	Ingestion (L/a)	DCF (uSv/Bq)
2	0.510	31.5	305.7	5.30E-05
3	0.559	34.5	305.7	5.30E-05
5	0.097	6.0	305.7	5.30E-05
6	0.073	4.5	305.7	5.30E-05
7	0.065	4.0	305.7	5.30E-05
Avg P(i)29	**0.261**	**uSv/annum**		

Date	Well 2 (Bq/L)	Well 3 (Bq/L)	Well 5 (Bq/L)	Well 6 (Bq/L)	Well 7 (Bq/L)
March 9, 2022	34	31	6	5	4
September 7, 2022	29	38	6	4	4
Average	**31.5**	**34.5**	**6.0**	**4.5**	**4.0**

Well 2	185 Mud Lake Road
Well 3	183 Mud Lake Road
Well 5	171 Sawmill Road
Well 6	40987 Highway 41
Well 7	40925 Highway 41

Well 3	**P(i)29**	**0.559**	**uSv/a**
	P(e)29	**0.000**	**uSv/a**
	P29	**0.559**	**uSv/a**

P(e)29 is the pathway of exposure to HTO due to immersion in surface water, and is negligible.

Public Dose Data
INFANT - 1 YEAR OLD
EMP Factors for Dose P49

P49 is the pathway for exposure to HTO due to ingestion of forage and crops.

Produce Sample Results (Bq free water tritium / kg fresh weight)

Source	Farm Gate Market 11133 Round Lake Road						Residences									
Type	Tomato	Cucumber	Corn	Onion	Beet	Average	LOCATION	Tomato	Onion	Apple	Herb	Carrot	Bean	Cucumb.	Asparag.	Zucch.	Average
	3	3	3	3	3	**3.0**	408 BOUNDARY ROAD	99	44								**71.5**
							413 SWEEZEY COURT			63	21						42.0
							611 MOSS DRIVE	71				36					53.5
							171 SAWMILL ROAD	6				4	5	5			5.0
							632 JOHNSON CRES.	43							28	30	33.7
Average						3.0		55	44	63	21	20	5	5	28	30	17.0

Produce Sample Results (Bq organically bound tritium / kg fresh weight)

OBT	2					**2.0**	408 BOUNDARY ROAD	6		7							**6.5**

Produce Consumption

100%=	**124.800**	**kg/a**	**[HTO] (Bq/kg)**	**(Bq/a)**	**[OBT] (Bq/kg)**	**(Bq/a)**
70%	87.360	**kg/a**	3.0	262.08	2.0	174.72
30%	37.440	**kg/a**	71.5	2676.96	6.5	243.36

P49 = [HTO or OBT]produce (Bq/kg) x Produce Ingested (kg/mo) x DCF (uSv/Bq)

P49 (uSv/a)	[HTO] pro (Bq/a)	DCF (uSv/Bq)	[OBT] pro (Bq/a)	DCF (uSv/Bq)
0.210	**2939.04**	5.30E-05	**418.08**	1.30E-04

P49	**0.210**	**uSv/a**

Public Dose Data
INFANT - 1 YEAR OLD
EMP Factors for Dose P59

P59 is the exposure to HTO due to ingestion of animal produce.

2022 Sample Results

Local Producer	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

Local Distributor	
	(Bq/L)
1	4.00
2	4.00
Average	**4.00**

TOTAL AVERAGE	**4.00**	Bq/L

Milk Density Adjustment		
Milk Average (Bq/L) x Milk density (L/kg)		
Bq/L	**L/kg**	**Bq/kg**
4.00	0.97	**3.880**

Consumption		
kg/da x da/a = kg/a		
(kg/da)	**(da/a)**	**(kg/a)**
0.931	365.25	**340.0**

P59 = [HTO]animal produce (Bq/kg) x Ingestion (kg) x DCF			
P59	**[HTO]**	**Ingested**	**DCF**
(uSv/a)	**(Bq/kg)**	**(kg/a)**	**(uSv/Bq)**
0.070	**3.88**	**340.0**	5.30E-05

APPENDIX S

Summary of Outgoing Shipments Containing Radioactive Material

Summary of Outgoing Shipments Containing Radioactive Material

Month	Number of Shipments
January	69
February	75
March	78
April	30
May	61
June	65
July	49
August	67
September	67
October	74
November	62
December	64
TOTAL	**761**
Average per month	*63*

Distribution of Outgoing Shipments

Country	Number of Shipments
United States	423
Canada	263
United Kingdom	20
Netherlands	8
Switzerland	8
South Korea	7
Israel	5
Bulgaria	4
Taiwan	4
Germany	3
Australia	2
France	2
Mexico	2
New Zealand	2
Singapore	2
Brazil	1
Denmark	1
Greece	1
India	1
Norway	1
Spain	1

APPENDIX T

Summary of Incoming Shipments Containing Radioactive Material

Summary of Incoming Shipments Containing Radioactive Material

Month	Number of Shipments
January	9
February	11
March	12
April	13
May	14
June	16
July	14
August	13
September	18
October	16
November	14
December	11
TOTAL	**161**
Average per month	*13*

Distribution of Incoming Shipments

Country	Number of Shipments
United States	136
Canada	11
Singapore	3
United Kingdom	3
China	2
France	2
Japan	2
Netherlands	1
Sweden	1