



# CNSC COMPLIANCE INSPECTION REPORT

**Inspection No.:** SRBT-2023-01

**Inspection Title:** Type II General Inspection

**Prepared by:** Lester Posada, Project Officer  
Nuclear Processing Facilities Division  
Directorate of Nuclear Cycle and Facilities Regulation

**Report Date:** May 9, 2023



**CANADIAN NUCLEAR SAFETY COMMISSION  
COMPLIANCE INSPECTION**

**Inspection No.: SRBT-2023-01**

**Licensee:** SRB Technologies (Canada) Inc.

**Licence No.:** NSPFL-13.00/2034

**Facility / Site Inspected:** SRBT Tritium Processing Facility

**Inspection Date(s):** March 14, 2023 – March 15, 2023

**Inspector:**

---

Aidan Leach,  
Lead Inspector, CNLRPD

**Approved by:**

---

Andrew McAllister  
Director, NPFD

**Safety and Control Area(s):** Human Performance Management,  
Operating Performance, Radiation Protection,  
Conventional Health and Safety, Environmental  
Protection, Waste Management

**Inspector Accompanied by:** Lester Posada – Project Officer  
Braedon Carr – Nuclear Facility Site Inspector

---

## EXECUTIVE SUMMARY

---

Pursuant to subsection 30(1) of the *Nuclear Safety and Control Act* (NSCA) Canadian Nuclear Safety Commission (CNSC) staff conducted an inspection at the SRB Technologies (Canada) Inc. facility from March 14, 2023, to March 15, 2023. The purpose of the inspection was to provide an overall assessment of compliance with specific clauses of the Nuclear Safety and Control Act and its Regulations, the operating licence NSPFL-13.00/2034 and its associated Licence Conditions Handbook (LCH), as well as SRBT's programs and procedures.

As this was a general inspection, there was no focus on a particular safety and control area (SCA). The scope of the inspection focused on the following SCAs:

- Human Performance Management
- Operating Performance
- Radiation Protection
- Conventional Health and Safety
- Environmental Protection
- Waste Management

CNSC inspectors' preliminary inspection facts and findings were discussed with licensee staff. A Preliminary Inspection Facts and Findings Report was tabled during the closing meeting held on March 15, 2023.

The inspection team found the licensee to be in compliance with the inspection criteria, and therefore no compliance actions or recommendations were raised as part of this inspection.

---

## Table of Contents

---

1. INTRODUCTION	1
2. PURPOSE AND SCOPE	1
3. DESCRIPTION OF INSPECTION METHODS	1
4. INSPECTION RESULTS	2
5. SUMMARY OF ENFORCEMENT ACTIONS AND RECOMMENDATIONS ISSUED	3
6. CONCLUDING STATEMENTS	3
7. REFERENCES	4
APPENDIX A: ACRONYMS AND ABBREVIATIONS	5
APPENDIX B: ATTENDANCE RECORD(S)	6
APPENDIX C: COMPLIANCE MATRIX	8

## 1. INTRODUCTION

---

An inspection at the SRB Technologies (Canada) Inc. (SRBT) facility was conducted from March 14, 2023 to March 15, 2023.

The licensee was assessed against provisions of the *Nuclear Safety and Control Act* (NSCA) and its associated Regulations, the conditions of the licence NSPFL-13.00/2034 [1] and the Licence Conditions Handbook (LCH) for SRBT [2], as well as applicable facility-specific and programmatic governing documentation.

Criteria for this inspection were derived directly from the set of documents described in the notification letter [3] and compiled into a Compliance Matrix (see Appendix C), which had been provided to SRBT staff prior to the inspection. Observations, interviews and records review were undertaken to assess compliance with regulatory expectations.

This report documents the findings and conclusions of the inspection, along with any enforcement actions or recommendations arising from the inspection. The results of this inspection activity will form part of CNSC staff's evaluation of the licensee's performance.

## 2. PURPOSE AND SCOPE

---

The purpose of the inspection was to provide an overall assessment of compliance with specific clauses of the NSCA and its Regulations, the operating licence NSPFL-13.00/2034 and its associated LCH, as well as SRBT's programs and procedures.

As this was a general inspection, there was no focus on a particular safety and control area (SCA). The scope of the inspection focused on the following SCAs:

- Human Performance Management
- Operating Performance
- Radiation Protection
- Conventional Health and Safety
- Environmental Protection
- Waste Management

## 3. DESCRIPTION OF INSPECTION METHODS

---

The NSCA, Canadian Nuclear Safety Commission (CNSC) Regulations, licence NSPFL-13.00/2034 licence conditions, and governing documents were reviewed as part of the preparation for the inspection. Various items were selected for verification and compiled into a Compliance Matrix. The inspection also included field observations and information provided by licensee staff.

Any number of the following method(s) of assessment were used during the inspection:

A. Documentation and record review

- Records were verified to be maintained as required by many of the outlined criteria, and a review of selected documents was performed to ensure their accuracy and completeness.

B. Visual assessment and verification

- A physical inspection of the facility with licensee staff was conducted. Observations based on identified compliance criteria were made for verification purposes.

C. Interviews and discussions with licensee staff

- Interviews and discussions with various licensee staff were conducted during the inspection. Questions were posed based on compliance criteria and responses documented for verification purposes.

Selected documentation and records were reviewed during the field verification component of the inspection. These were reviewed in order to determine whether the various records associated with the areas of the inspection are in compliance with associated regulatory and programmatic requirements.

As per the CNSC process, at the conclusion of the field verification portion of the inspection, a Preliminary Inspection Facts and Findings Report was provided to SRBT representatives [4]. This report was provided for purposes of outlining observations made by the inspection team at an overall level, based on a preliminary review of the criteria set identified in the Compliance Matrix and observations made.

#### **4. INSPECTION RESULTS**

---

The Compliance Matrix used for this inspection contains the compliance verification criteria (CVC) used to assess and evaluate compliance with regulatory and licensing requirements during this inspection. The criteria in the Compliance Matrix have been identified to have either “Met” or “Not Met” the applicable requirement.

The inspection team found the licensee to be in compliance with the inspection criteria, and therefore no compliance actions or recommendations were raised as part of this inspection.

## **5. SUMMARY OF ENFORCEMENT ACTIONS AND RECOMMENDATIONS ISSUED**

---

No compliance actions or recommendations were issued as part of this inspection.

## **6. CONCLUDING STATEMENTS**

---

CNSC staff performed an inspection of the SRBT in order to verify compliance with the NSCA, its associated Regulations, the conditions of the licence and the LCH.

The inspection team found the licensee to be in compliance with the inspection criteria, and therefore no compliance actions or recommendations were raised as part of this inspection.

CNSC staff extend their appreciation to SRBT for their assistance in conducting this inspection.

## 7. REFERENCES

---

- [1] SRB Technologies (Canada) Inc. Nuclear Substance Processing Facility Operating Licence, NSPFOL-13.00/2034, (e-Doc 6668491).
- [2] SRB Technologies (Canada) Inc. Licence Conditions Handbook, (e-Doc 6668496).
- [3] Letter from L. Posada (CNSC) to S. Levesque (SRBT), Notice of CNSC Type II Compliance Inspection of SRB Technologies (Canada) Inc. on March 14, 2023, to March 15, 2023, February 16, 2023 (e-Doc 6963041).
- [4] SRBT-2023-01 Preliminary Inspection Facts and Findings Report, March 15, 2023, (e-Doc 6924433)



---

**APPENDIX A: ACRONYMS AND ABBREVIATIONS**

---

CNLRPD	Canadian Nuclear Laboratories Regulatory Program Division
CNSC	Canadian Nuclear Safety Commission
DIF	Difficulty, importance, frequency
ESDC	Employment and Social Development Canada
GNSCR	<i>General Nuclear Safety and Control Regulations</i>
LCH	Licence Conditions Handbook
NEW	Nuclear Energy Worker
NPFD	Nuclear Processing Facilities Division
NSCA	<i>Nuclear Safety and Control Act</i>
NSRDR	<i>Nuclear Substances and Radiation Devices Regulations</i>
PPE	Personal protective equipment
RPR	<i>Radiation Protection Regulations</i>
SAT	Systematic Approach to Training
SDS	Safety Data Sheet
SRBT	SRB Technologies (Canada) Inc.
TNA	Training Needs Analysis
WHSC	Workplace Health and Safety Committee

APPENDIX B: ATTENDANCE RECORD(S)



Canadian Nuclear Safety Commission  
 Commission canadienne de sûreté nucléaire

Inspection Meeting Attendance Record  
 Directorate of Nuclear Cycle and Facilities Regulation

Unclassified



Canadian Nuclear Safety Commission  
 Commission canadienne de sûreté nucléaire

Inspection Meeting Attendance Record  
 Directorate of Nuclear Cycle and Facilities Regulation

Unclassified

6985969  
 e-Doc  
 Number

Licensee Name: SRB Technologies (Canada) Inc.  
 Licence Number: NSPFL-13.00/2034  
 Licensed Site: SRB Technologies Tritium Processing Facility (Pembroke, ON)  
 Facility / Program / Site: SRB Technologies Tritium Processing Facility  
 Title of Inspection: Type II General  
 Inspection Number: SRBT-2023-01  
 Inspection Date(s): March 14, 2023 to March 15, 2023  
 Lead Inspector: Aidan Leach, CNLRPD

Meeting Type: Opening

Name (print)	Role or Job Title	Signature
Lester Posada	Project Officer, CNSC	<i>[Signature]</i>
Aidan Leach	Inspector, CNSC	<i>[Signature]</i>
JAMIE MACDONALD	MANAGER HP+RA	<i>[Signature]</i>
Braeden Carr	Inspector, CNSC	<i>[Signature]</i>
Joshua Bull	Assistant Manager Health Physics	<i>[Signature]</i>
Darcy Gaudette	Logistics Manager	<i>[Signature]</i>
Paul Lavigne	Manager - Safety + Security	<i>[Signature]</i>

6985969



Canadian Nuclear Safety Commission  
 Commission canadienne de sûreté nucléaire

**Inspection Meeting Attendance Record**  
 Directorate of Nuclear Cycle and Facilities Regulation

**Unclassified**

6985969

e-Doc  
 Number

Licensee Name: SRB Technologies (Canada) Inc.  
 Licence Number: NSPFL-13.00/2034  
 Licensed Site: SRB Technologies Tritium Processing Facility (Pembroke, ON)  
 Facility / Program / Site: SRB Technologies Tritium Processing Facility  
 Title of Inspection: Type II General  
 Inspection Number: SRBT-2023-01  
 Inspection Date(s): March 14, 2023 to March 15, 2023  
 Lead Inspector: Aidan Leach, CNLRPD

Meeting Type: Closing

Name (print)	Role or Job Title	Signature
Lester Posada	Project Officer, CNSC	Remote
Aidan Leach	Lead Inspector, CNSC	Remote
Braedon Carr	Inspector, CNSC	Remote
Jamie MacDonald	Manager, Health Physics and Regulatory Affairs	Remote
Joshua Bull	Assistant Manager, Health Physics and Regulatory Affairs	Remote
Darci Gaudette	Logistics Manager	Remote
Paul Lavigne	Manager, Safety and Security	Remote



**Compliance Matrix**

**Unclassified**

**Directorate of Nuclear Cycle and Facilities Regulation**

Ref. Procedure *How to Conduct DNCFR Inspections*

**Lead Inspector:** Aidan Leach  
**Division:** CNLRPD

**APPENDIX C: COMPLIANCE MATRIX**

Licensee Name: SRB Technologies (Canada) Inc.  
 Licence Number: NSPFL-13.00/2034  
 Licensed Site: SRB Tritium Processing Facility (Pembroke, ON)  
 Facility / Program / Site: SRB Technologies Tritium Processing Facility  
 Title of Inspection: Type II General  
 Inspection Number: SRBT-2023-01  
 Inspection Date(s): March 14, 2023 to March 15, 2023  
 Lead Inspector: Aidan Leach, CNLRPD

**Inspection Safety and Control Area(s) and/or Other Matters of Regulatory Interest**

*Select all appropriate Safety and Control Area(s) for this Compliance Inspection here. If inspecting other matters of regulatory interest, select "Other," and specify.*

<input type="checkbox"/> Management System	<input checked="" type="checkbox"/> Environmental Protection	<input checked="" type="checkbox"/> Waste Management
<input type="checkbox"/> Fitness for Service	<input checked="" type="checkbox"/> Radiation Protection	<input type="checkbox"/> Security
<input checked="" type="checkbox"/> Operating Performance	<input checked="" type="checkbox"/> Conventional Health and Safety	<input type="checkbox"/> Safeguards and Non-Proliferation
<input type="checkbox"/> Safety Analysis	<input checked="" type="checkbox"/> Human Performance Management	<input type="checkbox"/> Packaging and Transport
<input type="checkbox"/> Physical Design	<input type="checkbox"/> Emergency Management & Fire Protection	<input type="checkbox"/> Other,

specify below

[Click here to enter text.](#)

Criteria	Compliance Expectation / Inspection Methods	Comments	Met/Not Met
<b>Safety and Control Area: Human Performance Management</b>			
<p><b>HPM01</b>                      Source: LCH                      REGDOC-2.2.2 Section 3 Requirement 6</p> <p>Licenses shall: implement a training change-management process that will systematically analyze procedural and equipment changes, changes in job descriptions, and operating experience feedback (including facility and industry-wide events), in order to identify changes to the tasks and task lists and to assess potential training implications leading to training modifications.</p>	<p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Verify that a training-change management process has been implemented including Training Needs Analysis.</li> <li>- Request and review a sample of Training Needs Analysis forms. Ensure that the training impact has been assessed.</li> <li>- Review a sample of change requests specific to changes to training material.</li> </ul> <p><b>Revision to Training Material/Document Review/Interview:</b></p> <ul style="list-style-type: none"> <li>- Verify version control process</li> <li>- Ensure old revisions shall be kept on file and identified as obsolete</li> </ul>	<p>SRBT noted that a Training Change Management Process is implemented as part of their Training Program. This is triggered by changes through the SRBT Change Control Process, which involves reviewing the change for human performance aspects such as training. SRBT uses a Training Needs Analysis (TNA) form to identify the scope of training required.</p> <p>SRBT keeps old revisions of their training materials within an “Obsolete” folder on their internal network. SRBT noted that physical copies of obsolete documents are shredded and disposed of.</p> <p><b>Documents Reviewed:</b>                      SRBT Training Program Manual, Rev. E, June 2020                      SAT-002-F-01 TNA Form, ECR for RSO-042 – Sep 2022</p> <ul style="list-style-type: none"> <li>- Implementation of new filters for tritium in air monitors will require training for staff</li> </ul> <p>SAT-002-F-01 TNA Form for ECR-1302 – Jan 2023</p> <ul style="list-style-type: none"> <li>- Implementation of formal “Hot Works” procedure will require new training for staff</li> </ul>	Met
<p><b>HPM02</b>                      Source: LCH                      REGDOC-2.2.2 Section 3, Requirement 7</p>	<p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Verify that licensee documentation describe the continuing training as applicable.</li> <li>- Request and review training analysis, continuing training material for refresher training for infrequent, abnormal and emergency operations tasks for the Rig Room (e.g. SAT-SHP-01: Import and Export Processes).</li> <li>- Verify that applicable training was implemented in alignment with the licensee’s continuing training procedures and training change control outputs.</li> </ul>	<p>The SRBT Training Program Manual incorporates refresher training as part of its program.</p> <p>SRBT provided a sample copy of Systematic Approach to Training (SAT) Annual Analysis Review. The review covered the analysis for all SAT-based training activities to ensure that the information remains valid and accurate.</p> <p>SRBT demonstrated implementation of periodic refresher training for tasks of low frequency but high difficulty/importance.</p>	Met

Criteria	Compliance Expectation / Inspection Methods	Comments	Met/Not Met
<p>Licenseses shall: ensure continuing training is provided to workers as deemed necessary through the job and task analyses processes, and that it includes updates to training programs stemming from the change-management process as identified through the training needs analysis process</p>	<ul style="list-style-type: none"> <li>- Request and review worker training records for associated continuing training.</li> </ul>	<p><b>Documents Reviewed:</b>                      SRBT Training Program Manual, Rev. E, June 2020                      SRBT Systematic Approach to Training – Annual Analysis Review, May 2020                      SRBT Systematic Approach to Training – Annual Analysis Review, May 2022                      SRBT Periodic Refresher Training Record – SAT-OP-01 Tritium Processing – Filling and Sealing Light Sources, Jan 2023</p> <ul style="list-style-type: none"> <li>- Activity: Steps for fixing a leak on a Filling Rig</li> </ul> <p>SRBT Refresher Training Records, Refresher Method: Review of procedure and conduct activities under observation of qualified trainer</p> <ul style="list-style-type: none"> <li>- SAT-OP-01 Tritium Processing – Filling and Sealing Light Sources, Nov 2022</li> <li>- SAT-OP-02 Bulk Splitter Operations, Nov 2022</li> <li>- SAT-OP-03 Handling PUTTs, Nov 2022</li> </ul>	
<p><b>HPM03</b>                      Source: Other                      SRBT-2020-01-AN02: SRBT shall implement a corrective action plan to ensure that refresher training is implemented based on the difficulty, importance and frequency (DIF) rating for infrequent, abnormal and emergency tasks.</p>	<p><b>Follow-up Document Review:</b>                      Verify development and implementation of refresher training strategies for SAT based training activities with subordinate tasks that are low frequency, yet high on the difficulty/importance scale (e.g., refresher training for infrequent, abnormal and emergency operations tasks for the Rig Room - SAT-SHP-01: Import and Export Processes, including refresher training if performance frequencies are not met).</p>	<p>SRBT demonstrated implementation of periodic refresher training for tasks of low frequency but high difficulty/importance.</p> <p><b>Documents Reviewed:</b>                      SRBT Training Program Manual, Rev. E, June 2020                      SRBT Systematic Approach to Training – Annual Analysis Review, May 2020                      SRBT Systematic Approach to Training – Annual Analysis Review, May 2022                      SRBT Periodic Refresher Training Record – SAT-OP-01 Tritium Processing – Filling and Sealing Light Sources, Jan 2023</p> <ul style="list-style-type: none"> <li>- Activity: Steps for fixing a leak on a Filling Rig</li> </ul> <p>SRBT Refresher Training Records, Refresher Method: Review of procedure and conduct activities under observation of qualified trainer</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met/Not Met
		<ul style="list-style-type: none"> <li>- SAT-OP-01 Tritium Processing – Filling and Sealing Light Sources, Nov 2022</li> <li>- SAT-OP-02 Bulk Splitter Operations, Nov 2022</li> <li>- SAT-OP-03 Handling PUTTs, Nov 2022</li> </ul>	
<p><b>HPM04</b>                      Source: Other                      SRBT-2020-01-AN03: SRBT shall implement a corrective action plan to ensure that a systematic and objective method (i.e., Training Needs Analysis) for assessing skills and knowledge gaps created by procedural and equipment changes, changes in job descriptions, operating experience feedback (including facility and industry-wide events) and modifications to regulatory requirements, is developed and implemented.</p>	<p><b>Follow-up Document Review:</b>                      Verify implementation of the Training Needs Analysis (TNA) tool that was created and described under process SAT-002, Analysis and within the SRBT Training Program Manual</p>	<p>SRBT has implemented the TNA form as part of their Training Program. SRBT noted that TNA helps clarify the specific needs to be addressed by any training, whether or not it is to be designed and developed systematically.</p> <p><b>Documents Reviewed:</b>                      SRBT Training Program Manual, Rev. E, June 2020                      SAT-002-F-01 TNA Form, ECR for RSO-042 – Sep 2022</p> <ul style="list-style-type: none"> <li>- Implementation of new filters for tritium in air monitors will require training for staff</li> </ul> <p>SAT-002-F-01 TNA Form for ECR-1302 – Jan 2023</p> <ul style="list-style-type: none"> <li>- Implementation of formal “Hot Works” procedure will require new training for staff</li> </ul>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<b>Safety and Control Area: Operating Performance</b>			
<p><b>OP01</b>                      Source: Other                      RSO-009 Tritium Inventory Management                      RSO-029 Nuclear Substances Inventory Management</p>	<p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Review tritium possession records</li> <li>- Review depleted uranium inventory records</li> </ul>	<p>CNSC staff confirmed that SRBT maintains an inventory of the amount of tritium possessed on site. CNSC staff reviewed the records and confirmed that SRBT maintains its inventory below its licence limit (6,000 TBq).</p> <p>CNSC staff also confirmed that SRBT maintains an inventory of depleted uranium on site, used as storage media for tritium. CNSC staff reviewed and confirmed that SRBT maintains an inventory below 10 kg of depleted uranium, which is below the exemption quantities as prescribed in the <i>Nuclear Substances and Radiation Devices Regulations</i>.</p> <p><b>Documents Reviewed:</b>                      Nuclear Substances Inventory Records – February 2023                      -1,953,246.34 GBq Tritium on site (32.55% of licence limit)                      - 8,721 g depleted uranium</p>	<p>Met</p>
<p><b>OP02</b>                      Source: Other                      SRBT Safety Analysis Report Section 10 – Operating Limits and Conditions</p>	<p><b>Document Review:</b></p> <p>Review records indicating operating hours and when operations have ceased due to precipitation events</p>	<p>CNSC staff confirmed that SRBT maintains a record log of operating hours for the Rig Room. CNSC staff reviewed a sample of the logs and confirmed that SRBT ceased operations during precipitation events.</p> <p>During the field walkdown portion of the inspection, CNSC staff confirmed that SRBT was not processing tritium due to precipitation at the time (snow).</p> <p><b>Documents Reviewed:</b>                      Rig Room Operations Log – September 2022</p>	<p>Met</p>




Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<b>Safety and Control Area: Radiation Protection</b>			
<p><b>RP01</b></p> <p>Source: Regulation  <i>Radiation Protection Regulations (RPR): 4(a), 5, 7, 10, 11</i></p>	<p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Observe the current listing of NEWs (including contractors).</li> <li>- Observe evidence of the provision of information to NEWs, including contractors.</li> <li>- Follow up on any recent pregnant NEWs and/or nursing NEWs (i.e., since January 1, 2022) and the process followed (including accommodations provided to ensure doses are kept ALARA), along with records associated.</li> </ul>	<p>SRBT noted that all of their workers are identified as Nuclear Energy Workers (NEWs). SRBT maintains a record of NEW Declaration Form for each worker.</p> <p>There were no pregnant NEWs declared in 2022.</p>	<p>Met</p>
<p><b>RP02</b></p> <p>Source: Regulation                      Details:                      RPR 4(a)  <i>General Nuclear Safety and Control Regulations (GNSCR): 12(1)(c)(d)(e) 17(a)(b)(d)(e)</i></p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Observe all persons on site wearing appropriate/required personal protective equipment (PPE).</li> <li>- Observe persons as they move through zone transitions throughout the facility.</li> <li>- Observe all persons following safe practices in line with ALARA/RP principles.</li> </ul> <p><b>Document Review:</b></p> <p>Review records of in-house RP inspections and/or self-assessments conducted at the facility for the 2022 calendar year. Note any areas of concern and determine if corrective actions were implemented and effective.</p>	<p>CNSC staff conducted a walkdown of the SRBT facility and noted that all workers were wearing the appropriate PPE in their respective departments.</p> <p>CNSC staff reviewed SRBT's internal audit report for its Radiation Protection and Dosimetry Service. Three opportunities for improvement were identified, with associated corrective actions and are being tracked to completion.</p> <p><b>Document Reviewed:</b></p> <p>SRBT 2022 RP Internal Audit Report – Radiation Protection and Dosimetry Service, December 2022</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>RP03</b>                      Source: Regulation                      Details: RPR 4(a)</p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Observe RP staff performing contamination monitoring if included in routines.</li> </ul> <p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Review records of routine contamination monitoring of areas.</li> <li>- Review records for recent exceedances of contamination monitoring “trigger” levels and follow up results/actions.</li> <li>- Review list of personal contamination incidents and events, for the 2022 calendar year, if any.</li> </ul>	<p>CNSC staff reviewed records associated with contamination monitoring at the SRBT facility. SRBT conducts contamination monitoring in Zone 3 on a daily basis, Zone 2 three times a week (Monday, Wednesday, Friday) and Zone 1 once a week (Tuesday).</p> <p>CNSC staff reviewed a sample of the routine contamination monitoring at the facility and confirmed that any exceedances of trigger levels were promptly addressed.</p> <p><b>Documents Reviewed:</b>                      SRBT Quarterly Zone 1 Contamination Assessment – Q2 2022                      SRBT Facility Contamination Monitoring Analysis &amp; Report (Zones 1 and 2) – April 2022</p> <ul style="list-style-type: none"> <li>- Disassembly Cabinet, April 5, 2022 reading of 5.61 Bq/cm<sup>2</sup> (above trigger level of 4 Bq/cm<sup>2</sup>/100cm<sup>2</sup>), area decontaminated and reassessed (re-swipe results are 0.16 Bq/cm<sup>2</sup>)</li> </ul>	<p>Met</p>
<p><b>RP04</b>                      Source: Regulation                      Details:                      RPR 4(b)                      GNSCR 12(1)(d)                      NSRDR 20</p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Observe radiation monitoring equipment and instrumentation in the field. Verify instrumentation has been calibrated and/or efficiency-checked within the last 12 months.</li> <li>- Observe appropriate placement and use of radiation monitoring equipment and instrumentation.</li> </ul> <p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Review equipment inventory list with location and status available.</li> <li>- Cross-reference select radiation monitoring equipment and instruments observed in the field with calibration certificates.</li> </ul>	<p>CNSC staff conducted a walkdown of the SRBT facility and noted that all observed radiation protection instrumentation were calibrated within the last 12 months. CNSC staff reviewed and confirmed that SRBT maintains calibration certificates for their radiation protection instruments.</p> <p><b>Documents reviewed:</b>                      SRBT Master List – Calibrated Equipment                      Instrument Calibration Record – Overhoff 357RM, February 9, 2023</p> <ul style="list-style-type: none"> <li>- S/N 2614</li> <li>- S/N 4641</li> </ul>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>RP05</b>                      Source: Regulation                      Details:                      RPR 4(a)                      GNSCR 12(1)(c), 17(b)                      Source: LCH                      Details: Radiation Safety Program</p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Observe compliance with the licensee’s RP program requirements and rules for personal hygiene, smoking, eating and drinking in zoned areas.</li> <li>- Observe correct practices followed by workers/contractors in zoned areas and in eating areas.</li> <li>- Question workers/contractors on the correct practices for eating, drinking and smoking in the workplace.</li> </ul> <p><b>Document Review:</b>                      Confirm that expectations for personal hygiene and smoking, eating and drinking restrictions (including chewing of gum) are documented.</p>	<p>CNSC staff conducted a walkdown of the SRBT facility and observed workers following the rules for personal hygiene, smoking, eating and drinking in zoned areas.</p> <p>Expectations for personal hygiene in zoned areas are documented in the SRBT Radiation Safety Program Manual, Section 6.2 <i>Requirements at Radiation Safety Zone Transition Points.</i></p> <p><b>Document Reviewed:</b>                      SRBT Radiation Safety Program Rev N, July 2021</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<b>Safety and Control Area: Conventional Health and Safety</b>			
<p><b>CHS01</b>                      Source: LCH                      SRBT Hazard Prevention Program Appendix A                      Instructions in Workplace Health and Safety and Hazard Identification</p>	<p><b>Field Check:</b>                      Safety glasses or regular prescription eyewear must be worn in each department (Glass Shop, Coating, Rig Room, Milling/Molding, Assembly) at all times.</p>	<p>CNSC staff conducted a walkdown of the SRBT facility and noted that all workers were wearing the appropriate PPE in their respective departments.</p>	<p>Met</p>


Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>CHS02</b>                      Source: LCH                      SRBT Hazard Prevention Program Appendix A                      Instructions in Workplace Health and Safety and Hazard Identification</p>	<p><b>Field Check:</b>                       Work area must be kept tidy and free of clutter to prevent injury.</p>	<p>CNSC staff conducted a walkdown of the SRBT facility and noted that the housekeeping at the facility was in a good condition.</p>	<p>Met</p>
<p><b>CHS03</b>                      Source: LCH                       SRBT Health &amp; Safety Policy Section 5 Workplace Health and Safety Committee</p>	<p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Verify records related to Workplace Health and Safety Committee (internal audits, self-assessments, meeting minutes, workplace inspections)</li> <li>- Note actions arising from Health and Safety Committee meetings/inspections and progress to closure</li> </ul>	<p>CNSC staff confirmed that SRBT maintains a Workplace Health and Safety Committee (WHSC) that meets regularly and follows up on any actions to closure. SRBT WHSC minutes includes items such as the status of workplace inspections, review of health and safety objectives, and a review and status of actions raise from previous WHSC meetings.                       CNSC staff reviewed a sample of WHSC meeting minutes, no issues were noted.</p> <p><b>Documents Reviewed:</b>                      SRBT WHSC Meeting Minutes – January 2023, December 2022</p>	<p>Met</p>
<p><b>CHS04</b>                       Source: LCH                       SRBT Hazard Prevention Program</p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Visual observations and record reviews of labels and safety data sheets to confirm status of compliance with WHMIS 2015.</li> </ul> <p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Verify that WHMIS training aligns with 2015 requirements and verify status of training for all workers.</li> </ul>	<p>CNSC staff conducted a walkdown of the SRBT facility and noted that all observed chemicals were labelled appropriately in accordance with WHMIS 2015.</p> <p>SRBT noted that they provide an annual refresher training for all workers, which includes a refresher on WHMIS 2015.</p> <p><b>Document Review:</b>                      SRBT Annual All-Staff Training Record – December 2022</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>CHS05</b>                      Source: Other                      SRBT Hazard Prevention Program</p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>- Verify location(s) for chemical storage and ensure that chemicals are safely stored according to procedure.</li> </ul> <p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>- Review records associated with inventory of hazardous substances in the workplace.</li> </ul>	<p>During the walkdown, CNSC staff observed that SRBT keeps hazardous substances in appropriate storage cabinets in the facility. Safety Data Sheets (SDS) are made available to all workers both electronically and in a centralized location.</p>  <p><b>Document Reviewed:</b>                      SRBT MSDS-SDS Index</p>	<p>Met</p>
<p><b>CHS06</b>                      Source: Other                      SRBT Hazard Prevention Program                      Details: Section 8.0 and 10.0.</p>	<p><b>Document Review:</b></p> <p>Verify training records and program review records are maintained per this program's requirements.</p>	<p>CNSC staff reviewed training records for SRBT staff as per the requirements of the Canada Labour Code and its regulations. CNSC staff confirmed that SRBT administers training and maintains records for their hazard prevention program as well as health and safety procedures.</p> <p><b>Documents Reviewed:</b>                      SRBT Hazard Prevention Program Training Record                      SRBT Health and Safety Procedures Training Record</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<b>CHS07</b> Source: Other SRBT Health & Safety Policy Section 6 Duties	<b>Document Review:</b> Verify records related to key performance indicators for safety <ul style="list-style-type: none"> <li>- Review records of OH&amp;S performance for 2022</li> <li>- Review records of OH&amp;S objectives and targets for 2022</li> <li>- Review recent Occupational Injuries, Minor Injuries, Hazardous Occurrence and Near Misses records</li> </ul>	SRBT noted that the WHSC reviews health and safety objectives and targets during their regular meetings. There were no injuries or accidents in January 2023. CNSC staff also reviewed the latest Employment and Social Development Canada (ESDC) Workplace Committee Report that SRBT is required to submit annually, no issues were noted.  <b>Documents Reviewed:</b> SRBT WHSC Meeting Minutes – January 2023, December 2022 ESDC Workplace Committee Report – March 2023	Met

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<b>Safety and Control Area: Environmental Protection</b>			
<b>EP01</b> Source: Regulation <u>Details:</u> <i>Class I Nuclear Facilities Regulations, Section 14 (1)</i>	<b>Document Review:</b> Records pertaining to the nature and amount of radiation, nuclear substance and hazardous substances.  Records pertaining to the results of effluent (airborne and liquid emissions), environmental, and groundwater monitoring programs. <ul style="list-style-type: none"> <li>- Review weekly stack monitoring record</li> <li>- Review liquid effluent monitoring record</li> <li>- Review sample analysis and reporting records of airborne and liquid effluent</li> <li>- Review environmental and groundwater monitoring records</li> </ul>	CNSC staff confirmed that SRBT maintains a record of airborne and liquid effluent releases from the facility. CNSC staff reviewed airborne and liquid effluent records and confirmed that emissions remained below licence limits. There were no action levels exceeded during the 2022 calendar year.  CNSC staff also confirmed that SRBT continues to maintain a network of groundwater monitoring wells around the facility. CNSC staff reviewed groundwater monitoring records, no issues were noted.  <b>Documents Reviewed:</b> Liquid Effluent Assessment – January 2023 Real-time Stack Monitoring Record (Bulk and Rig Stack)– Feb 7-14, 2023 EFF-001-F-02 Stack Monitoring Report form – Feb 6-14, 2023 Groundwater Monitoring Data – Dec 2022	Met

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>EP02</b>                      Source: Regulation  <i>General Nuclear Safety and Control Regulations, Section 12(1)(c)(f)</i></p>	<p><b>Field Check:</b></p> <ul style="list-style-type: none"> <li>Observe whether monitoring equipment for airborne and liquid emissions are functioning properly.</li> </ul> <p><b>Document Review:</b></p> <ul style="list-style-type: none"> <li>Review calibration records of the equipment used for the effluent monitoring program and compare it against manufacturer of equipment</li> </ul>	<p>CNSC staff verified that SRBT maintains monitoring equipment for airborne and liquid emissions from the facility. CNSC staff confirmed that the monitoring equipment is up-to-date and calibrated.</p> <p><b>Documents reviewed:</b>                      Instrument Calibration Record – Overhoff 357RM, November 18, 2022, S/N 4163, 4294</p>	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>Safety and Control Area: Waste Management</b></p>			
<p><b>WM01</b>                      Source: Other  <i>CSA N292.0-19, General principles for the management of radioactive waste and irradiated fuel:</i></p>	<p><b>Document Review:</b></p> <p>Section 4.7.4 b: Records, written in hard copy and/or stored in electronic format, shall track the waste inventory under the control of the waste management site</p>	<p>CNSC staff confirmed that SRBT maintains electronic records for their waste inventory on site.</p> <p>Spot Checked in the field - Container ID# 2023-030</p> 	<p>Met</p>

Criteria	Compliance Expectation / Inspection Methods	Comments	Met / Not Met
<p><b>WM02</b>                      Source: Other                      CSA N292.0-19, <i>General principles for the management of radioactive waste and irradiated fuel:</i></p>	<p><b>Document Review:</b>                      Section 4.7.8: Duplicate records shall be maintained at an alternate location to prevent inadvertent loss of the records in the event of an accident at the facility.</p>	<p>SRBT noted that they conduct a network backup once every 2 weeks, including all records generated. The backup is stored offsite, and hard copies of records are printed and kept as well.                      SRBT Procedure ENG-012 “Computer system, File Server Backup” outlines the process for the network backup.</p>	<p>Met</p>