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Ms. J. Campbell  
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Canadian Nuclear Safety Commission  
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**Subject: CNSC Staff Recommendations – AL Exceedance**

Dear Ms. Campbell,

Thank you for your letter [1] detailing CNSC Staff's acceptance of our final report on the action level exceedance for gaseous stack emissions during the week of October 28 – November 4, 2014.

We would like to take this opportunity to address both recommendations contained in the letter; these are repeated in *italics* below, with SRBT's response immediately following.

*Recommendation #1: SRBT should re-examine procedures for other potential incidents that may result in releases of tritium outside the 07:00 to 19:00 operating hours.*

We confirm that an internal review of our procedures did not uncover any potential incidents where releases of tritium would occur outside of operating hours.

Our processing policy is that any production activities with the potential for releases of tritium to the ventilation systems are not started if they cannot be reasonably expected to be completed by the end of the operating period of 1900h. As well, no processing operations are permitted in the morning prior to 0700h.

All processing equipment is required to be placed into a safe shutdown state at the conclusion of operations each day. Tritium containers are secured and contained, operating equipment is shut down and tritium light sources are placed in their storage areas.

Management has also reinforced to staff that even though tritium processing operations may only occur between 0700h and 1900h, in order to mitigate fugitive emissions due to leakage from light sources may be addressed outside of these times in a controlled and efficient fashion.

*Recommendation #2: SRBT should consider options for secondary isolation or entrapment of tritium related to the processes that led to the two releases out the stack ventilation, and inform CNSC of the outcome of these considerations.*

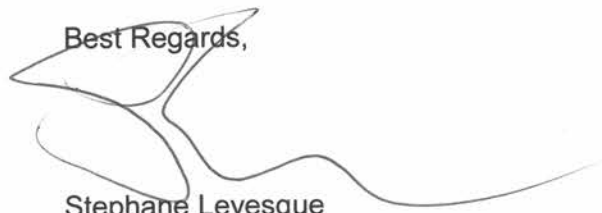
As indicated in previous correspondence [2], SRBT plans to allocate firm financial and management resources dedicated to finding ways to reduce tritium emissions from the facility. These resources will

focus on both process improvements, as well as research into emission reduction equipment and technologies.

Within the scope of this initiative, we will be investigating the potential for entrapment and / or secondary isolation of gaseous tritium released by our processing operations. As with any complex facility safety system modification, this process would likely require formal safety analysis, as well as Commission approval prior to implementation, and therefore SRBT expects that CNSC Staff will be engaged and informed of the outcome of this research once it begins.

We very much appreciate CNSC Staff recommendations on this subject. If you require any additional information or wish to discuss this matter further, please do not hesitate to contact Jamie MacDonald, Ross Fitzpatrick or myself at any time.

Best Regards,

A handwritten signature in black ink, appearing to read 'Stéphane Levesque', written in a cursive style.

Stéphane Levesque  
President  
SRB Technologies (Canada) Inc.

cc: R. Buhr, CNSC  
R. Fitzpatrick, SRBT  
K. Levesque, SRBT  
J. MacDonald, SRBT

**References:**

- [1] Letter from J. Campbell (CNSC) to S. Levesque (SRBT), *SRB Final Report on November 4, 2014 Action Level Exceedance*, dated January 23, 2015 (e-Doc 4609221)
- [2] Email from J. MacDonald (SRBT) to J. Campbell (CNSC), *Details on SRBT Emissions Reductions Initiatives over the Past Licence Term*, dated December 23, 2014