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ANNUAL COMPLIANCE MONITORING REPORT

January 1 to December 31
2022

The information contained in this report concerns the performance and operation of BWXT Medical Ltd. Class IB nuclear facility located in Ottawa, Ontario. This report is prepared to meet the requirements of the Class IB Nuclear Substance Processing Facility Licence, NSPFL-15.00/2031, specifically Licence Condition 3.2 regarding reporting requirements. The details provided in this report demonstrate BWXT Medical's commitment to operate a safe Nuclear Medicine Production Facility and to remain compliant with applicable regulatory requirements prescribed by the Canadian Nuclear Safety Commission.

Revision	Description	Prepared by Date	Reviewed by Date	Approved by Date
00	Initial Issue	N. Iannucci 2023-03-24	R. Decaire 2023-03-28	T. Mahilrajani 2023-03-30

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1. Executive Summary

BWXT Medical Ltd. is a respected supplier of nuclear medicine products used for the prevention, diagnosis and treatment of disease for the lives of millions of people in many countries around the world. Our products are used daily by pharmaceutical and biotechnology companies, medical-device manufacturers, hospitals, clinics and research laboratories. The scope of the manufacturing and product development activities at our site for Medical Isotopes includes: active pharmaceutical ingredients, finished pharmaceuticals, medical devices and contract manufacturing.

The purpose of this compliance report is to demonstrate that BWXT Medical has successfully met the requirements of the Nuclear Safety and Control Act, associated regulations and the Class IB Nuclear Substance Processing Facility Licence, NSPFL-15.00/2031 issued by the Canadian Nuclear Safety Commission (CNSC). This report was prepared based on 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*. Appendices containing confidential, proprietary or prescribed information are submitted to the CNSC separately.

BWXT Medical is committed to continuously improve systems to protect the environment as well as the health and safety of employees and our community. We work to implement programs and processes to prevent pollution and minimize waste. Maintaining a safe and healthy work environment for our employees is a top business priority. BWXT Medical has implemented a management system that includes quality assurance requirements for the licensed activities, which ensures structures, systems and components are designed, installed, operated and maintained in accordance with the Nuclear Safety and Control Act, associated regulations, codes and standards, jurisdictional requirements and best practices.

There were no significant changes to operations in 2022. Facility modifications for the future Tc-99m generator process are substantially complete; development work for the process continued in 2022 and is expected to be completed in 2023.

All radiation doses received by employees and contractors were below regulatory limits (50 mSv/yr for Nuclear Energy Workers and 1 mSv/yr for all other workers), action levels and internal administrative levels.

Releases of nuclear substances to the environment were prevented or controlled, resulting in a negligible estimated dose to members of the public, below 0.0005 mSv for the entire year.

There were four (4) medical treatment incidents and one (1) lost time incident in 2022. The majority of the incidents were strain injuries and initiatives are in place to reduce the likelihood and severity of strain injuries moving forward.

BWXT Medical places great importance on its relationships with all levels of local government and residents in the communities in which it operates and works to ensure there is open communication and awareness of BWXT Medical's operating activities. The Public Information and Disclosure Program defines the process for providing information about BWXT Medical operations.

Additionally, BWXT Medical has established an Indigenous Engagement program that ensures Indigenous Communities are informed and consulted for key developments. In 2022, BWXT Medical supported cultural protection programs and attended cultural awareness training. This successfully served as a good foundation on which to build meaningful engagement.

This compliance monitoring report demonstrates that BWXT Medical has successfully met the requirements of the Nuclear Safety and Control Act, associated regulations and Class IB Nuclear Substance Processing Facility Licence conditions.

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List of Acronyms

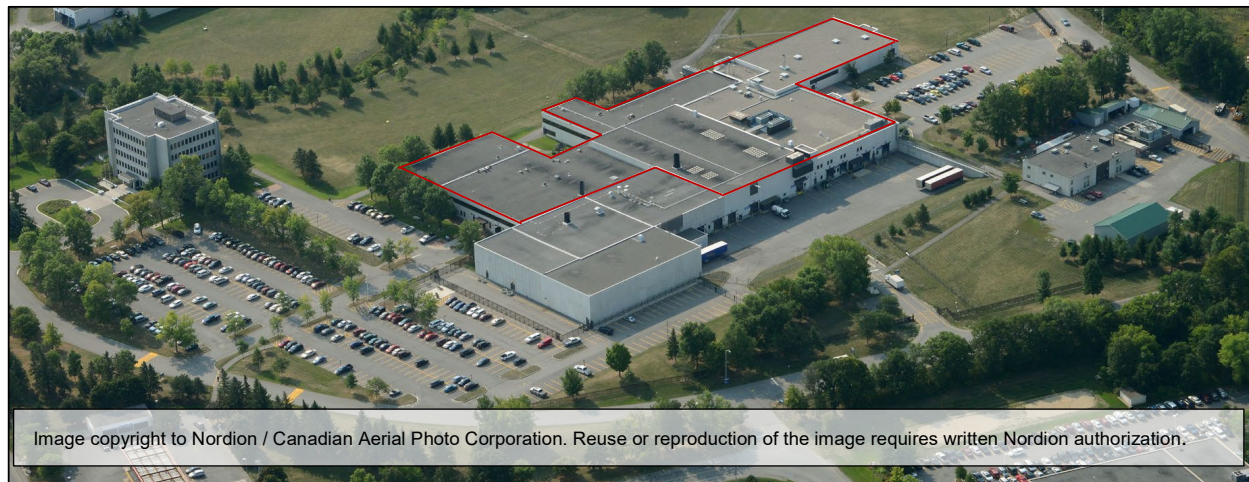
ALARA	As Low As Reasonably Achievable
AMMS	Advanced Maintenance Management System
BMS	Building Management System
CAD	Charcoal Adsorber
CAM	Continuous Air Monitor
CNSC	Canadian Nuclear Safety Commission
DRL	Derived Release Limit
ECA	Environmental Compliance Approval
EHS	Environment, Health and Safety
ERA	Environmental Risk Assessment
ERO	Emergency Response Organization
FSAR	Final Safety Analysis Report
HEPA	High Efficiency Particulate Air
INPO	Institute of Nuclear Power Operations
KOB	Kanata Operations Building
KRMF	Kanata Radiopharmaceutical Manufacturing Facility
MCA	Multi-Channel Analyzer
MDA	Minimum Detectable Activity
NEW	Nuclear Energy Worker
NMPF	Nuclear Medicine Production Facility
NPRMI	Non-Production Radioactive Material Inventory
NSPFL	Nuclear Substance Processing Facility Licence
NVS	Nuclear Ventilation System
PIDPIE	Public Information and Disclosure Program and Indigenous Engagement
RP	Radiation Protection
SSC	Systems, Structures and Components
TLD	Thermo-luminescent Dosimeter

2. Introduction

The purpose of the annual compliance monitoring report is to demonstrate that BWXT Medical Ltd. has successfully met the requirements of the Nuclear Safety and Control Act, associated regulations and the Class IB Nuclear Substance Processing Facility Licence, NSPFL-15.00/2031 issued by the Canadian Nuclear Safety Commission (CNSC). This report was prepared to meet the requirements of CNSC Regulatory Document 3.1.2: *Reporting Requirements, Volume I: Non-Power Reactor Class 1 Nuclear Facilities and Uranium Mines and Mills*.

The Nuclear Medicine Production Facility (NMPF) is comprised of a portion of the Kanata Operations Building (KOB) and the entire Kanata Radiopharmaceutical Manufacturing Facility (KRMF), both located on Nordion property situated on 447 March Road, Kanata, ON. The site is a parcel of 56.8 acres located to the southwest of the intersection of Carling Avenue and Solandt Road in the Kanata North Business Park.

Figure 1: 447 March Road – Aerial View (BWXT Medical leased area outlined in red)



2.1. Processes and Materials

In 2022, BWXT Medical manufactured two products using these radionuclides respectively: Yttrium-90 (Y-90) and Indium-111 (In-111). For both products, irradiated raw material is received, processed, dispensed, sterilized and packaged for shipment to customers.

The Y-90 product is a sterile, active implantable Class III medical device used to treat liver cancer. BWXT Medical is under contract to supply this product. The In-111 product is a diagnostic radiopharmaceutical used for the assessment of inflammation and infection within the body.

Additionally, BWXT Medical continued its development of the Technetium-99m (Tc-99m) generator program using its patent-pending innovative technology to generate Tc-99m from irradiated molybdenum targets. BWXT Medical seeks to furnish a stable North American-based supply of Tc-99m, the most widely sought-after medical isotope used in the diagnosis of serious illnesses, such as heart disease and cancer.

The facility comprises an administrative area known as the "Non-Active Area" and a controlled access production area known as the "Active Area". The Active Area encompasses the radiochemical and radiopharmaceutical facilities in the NMPF. The nuclear medicine products manufactured in this facility are used for diagnosis and treatment of disease, benefiting the lives of millions of people around the world.

The handling of radioisotopes takes place in processing containment units such as hot cells, glove boxes and fume hoods (See Figures 2 and 3). The hot cell wall shielding (e.g., lead wall, lead bricks, steel, concrete) is selected to minimize dose rates to the operator. The hot cells are typically grouped in banks which have a step down pressure differential to facilitate clean processing. While high radioactivity materials are handled in hot cells, lower activity amounts are handled in glove boxes where the level of radiation and the amount of required shielding is reduced. Glove boxes are typically constructed of Lucite and stainless steel. They are typically equipped with general and localized lead shielding of sufficient thickness to minimize occupational radiation exposure. Neoprene gloves are sealed in place over the flanges at the glove ports. Fume hoods are generally designed to handle low levels of radioactivity (e.g., Quality Control samples, decontamination of equipment, etc.) and allow easier unrestricted manipulation of parts and chemicals used by the operator while maintaining adequate ventilation to ensure contamination control. Fume hoods are constructed of stainless steel, inside and out, with service controls located on the exterior face. Localized shielding is used where required to minimize occupational radiation exposure.



Figure 2: A hot cell at BWXT Medical



Figure 3: A fume hood at BWXT Medical

3. Safety and Control Areas

3.1. Management System

3.1.1. Applicable Activities

The Management System for Safety is applicable to all CNSC licensed activities, which predominantly refers to the processing and manufacturing of nuclear substances used in health sciences. Other licensed activities include the possession, transfer, use, storage and disposal of nuclear substances and sealed sources.

3.1.2. Management System for Safety Program Effectiveness

Overall, the management system has proven to be effective as a set of processes to ensure the safety of workers and protection of the environment. This is largely based on the outcome of internal and external audits (Section 3.1.3) and Manager self-assessments, as well as the successful performance of each Safety and Control Area as described in the remainder of this report.

During the 2022 Annual Management Review of the Management System for Safety, the Leadership Team identified the following necessary improvements in 2023:

1. Further minimize the number of musculoskeletal injuries by reporting early discomfort and investigating modern manipulator components.
2. Implement improvement actions following the safety culture survey in 2022 and explore further improvements to the Human Performance Program.
3. Improve the reliability of compliance with training, PPE and machine guarding.
4. Define additional metrics to further assess the performance of safety programs and drive improvement.

3.1.3. Internal and External Audits

Internal and external audits are a key part of the Management System for Safety.

The internal audits that were completed in 2022, as per Table 1, included production areas and supporting functions as well as program audits.

Five non-conformances identified across all audits: deficient documented procedural requirements, a single waste container that was not appropriately labelled, inadequate identification of two low-activity waste sources, no record of emergency response steering committee meeting, and overdue training.

All of these findings were minor in nature, with no significant impact to the protection of health, safety and the environment. All findings have been appropriately actioned.

Table 1 - Internal audits

Scope	No. of non-conformances
Health and Safety Program	1
Emergency Preparedness	2
Fire Protection Program	0
Radiation Protection	1
Construction, Commissioning and Decommissioning	0
NPRMI (Non Production Radioactive Material Inventory)	1
Air Cargo	0
Suppliers	0
Total:	5

In addition to the internal audits listed above, a BWXT Corporate EHS audit was conducted in 2022. The scope of the audit was expansive, covering occupational health and safety, environmental protection, and emergency response. There were three non-conformances that were identified: insufficient machine guarding, confined space signage and safety eyewear compliance. Corrective actions for all three findings have been established.

The CNSC performed the following inspections in 2022:

1. Management System including the following Safety and Control Areas: Conventional Health and Safety, Operating Performance, Fitness for Services, Radiation Protection, Environmental Protection, Waste Management and Safety Culture.
2. Emergency Management including on-site observation and evaluation of the October Full-Scale Exercise.
3. Physical Inventory Verification of safeguarded material, with the IAEA.

Across all three CNSC inspections, there were no non-conformances and one recommendation relating to the timeliness of training completion.

The results of all audits and inspections demonstrate a high level of compliance with EHS programs. Internal and external audits remain a beneficial management system tool for monitoring and continuous improvement.

3.1.4. Management System for Safety Program Improvements

There were no changes to the core BWXT Medical management system processes.

3.1.5. Summary of Organizational Structure and Key EHS Personnel

Effective August 1, 2022, Jonathan Certain assumed the role of President for BWXT Medical. Subsequent changes were made to the reporting structure; the current organization chart is shown in Figure 4. None of the changes affect the core responsibilities of the leadership team as it relates to the Management System for Safety.

The President of BWXT Medical has the ultimate responsibility for the organization, ensuring adequate resources and support to deliver on all business, regulatory and community commitments. The leadership team for BWXT Medical directly reports to the President.

The President has appointed the Director, Nuclear Regulatory & EHS as the Management System representative, who has the responsibility and authority to ensure that the Management System is established, implemented and maintained.

Together the Director, Nuclear Regulatory & EHS and the Senior Manager, Radiation Safety are responsible for the protection of workers, public and the environment. They have the authority to cease operational activities that present unsafe or non-compliant situations.

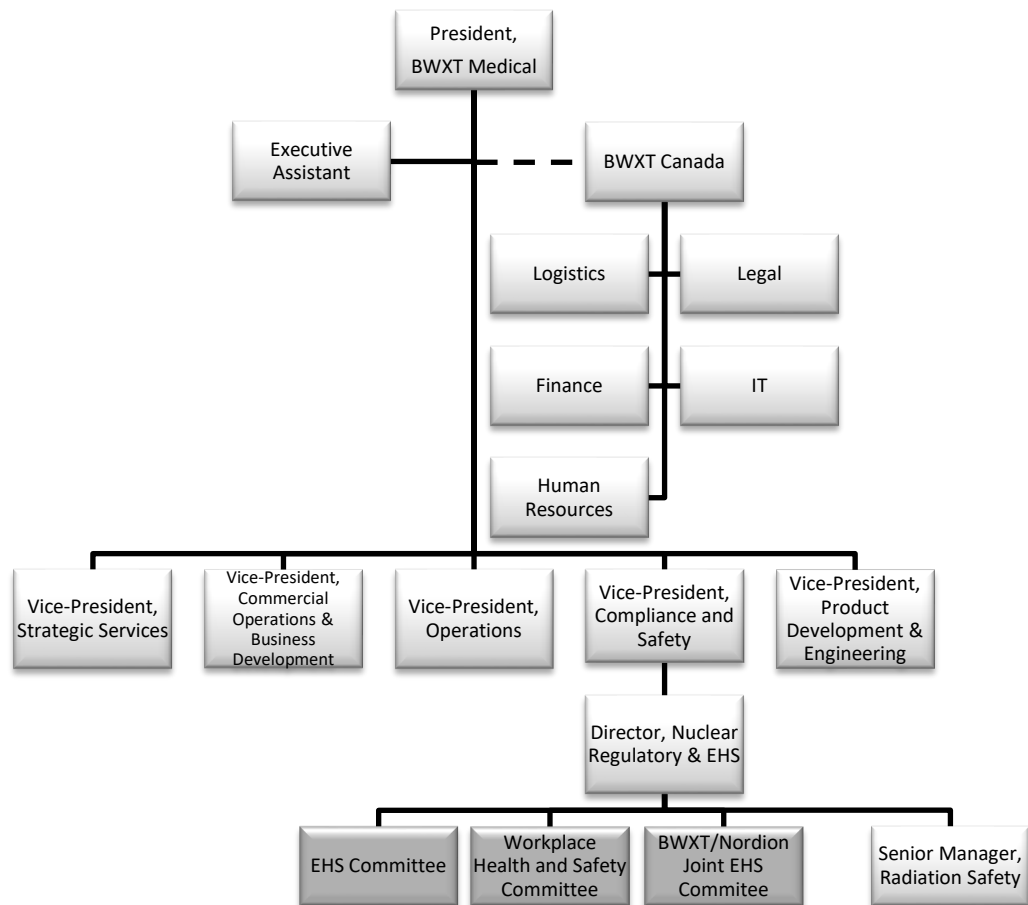


Figure 4: Leadership Organization Chart

3.2. Human Performance Management

The Human Performance Management Safety and Control Area covers activities that enable effective human performance through the development and implementation of processes that ensure BWXT Medical staff are sufficient in numbers in all relevant job areas and have the necessary knowledge, skills and tools in place to safely carry out their duties.

Qualifications and training requirements are identified and personnel are given the appropriate training to ensure they are competent at the work they do. This training includes courses related to EHS and radiation safety, as well as on-the-job training. Workers only perform tasks for which they are qualified.

As shown in Table 2, training associated with key safety programs were completed as required in 2022 with the following to note of the 21 training requirements not completed:

- 9 training requirements were assigned to employees who were on long-term leave.
- 8 training requirements associated with forklift operation, emergency response, fire watch and lockout tagout. Employees who did not complete this training did not perform any of the associated job tasks. There were sufficient alternatives to perform the same work.
- 4 training requirements were assigned to a single employee and were due at the end of December 2022 – the employee did not perform any of the associated job tasks.

The facility is staffed with a sufficient number of qualified workers to carry out licensed activities safely and in accordance with the Nuclear Safety and Control Act and associated regulations. EHS, Radiation Safety and other staff are available after business hours as needed.

The Human Performance Program has proven to be effective in ensuring that workers are adequately trained and prepared to perform work safely and in compliance with company policies and procedures.

Table 2 - Safety training

Program	Duration	Participants		
		No. required	No. completed	No. not completed
Nuclear Energy Worker (NEW) Indoctrination and NEW Refresher	4 Hours / Self Study	238	238	0
Radiation Instrumentation Workshop	3 Hours	238	237	1
Transport of Dangerous Goods Level III	1 Hour	46	44	2
Transport of Dangerous Goods – 4-year refresher	1 Hour	39	38	1
Working with BETA	1 Hour	124	121	3
Crane	Half Day	41	41	0
Working at Heights	Half Day	87	87	0
Confined Space	Half Day	113	112	1
Pallet Truck – Class III	Half Day	154	154	0
Forklift – Narrow Aisle	Half Day	21	19	2
Forklift – Counter Balance	Half Day	8	8	0
Emergency Response Part 1	2 Hours	29	27	2
Emergency Response Part 2	2 Hours	13	12	1
Emergency Response Part 3	2 Hours	8	6	2
Emergency Communication – 2 Way Radio	1 Hour	28	28	0
SCBA Part 1 – MSA AirHawk	1 Hour	8	7	1
SCBA Part 1 – Chemical Spill	1 Hour	15	14	1
First Aid	2 Day	11	11	0
WHMIS	1 Hour	295	294	1
Fire Watch	2 Hours	37	35	2
Lockout Tagout	2 Hours	99	98	1
TOTAL		1652	1631	21

3.3. Operating Performance

The Operating Performance Safety and Control Area covers an overall review of the licensed activities.

BWXT Medical has successfully implemented and maintained programs to ensure safe operation of the licensed activities within the facility as bounded by safety analysis. BWXT Medical has established essential documentation including standard operating procedures and work instructions prescribing the steps required to complete each task. This includes the written work instructions for handling of radioactive materials by workers to ensure activities are conducted in a manner that is protective of workers, the public and the environment; as well as full and accurate records to show the acquisition and inventory of nuclear substances for use or processed by BWXT Medical.

3.3.1. Effectiveness in Carrying out Licensed Activities

Licensed activities were carried out according to BWXT Medical's programs, policies and procedures resulting in no significant unplanned events.

BWXT Medical's programs that are in place for auditing and capturing non-conformances continue to identify issues in areas that require corrective actions. These processes functioned as expected.

The 2022 EHS program objectives and results are shown in Table 3.

There were four (4) medical treatment (only) injuries in 2022, which exceeded the target of two (2), and equalled the total in 2021. All four injuries were strain injuries, three resulting from lifting materials and one resulting from manipulator work.

There was one lost time injury when an employee was operating a hand drill to load a pail into a waste bunker. The drill kicked back and made contact with their head and fingers. The resulting lost time was 26 days. The 2022 severity rate was 9.65 and the frequency rate was 0.37. The waste bunker loading mechanism is being re-designed to minimize operator intervention and eliminate or mitigate the associated hazards.

Corrective actions to significantly improve occupational health and safety were the primary focus of the Annual Management Review (see Section 3.1.2).

There was one reportable release of a hazardous (non-radiological) substance to the sanitary sewer. An unmarked container with a small amount of left-over transparent mineral oil was used to collect a roof leak. The contents were incorrectly assumed to be solely water and were dumped directly down the drain. The release was reported to the City of Ottawa in accordance with the Sewer Use By-law.

There were no exceedances of the Sewer Use By-law during routine sampling of the sanitary sewer. It should be noted that composite sampling for most parameters began in 2022, in line with City recommendations.

The radiation safety objective was met. In 2023, the target maximum effective dose to employees will be reduced to 4.5 mSv.

Table 3 - 2022 EHS Program Objectives and Results

Objective	Measure/Target	Result
Minimize the number and extent of occupational injuries	<ul style="list-style-type: none"> The number of medical treatment incidents ≤ 2 Lost time incidents = 0 	<ul style="list-style-type: none"> The number of medical treatment incidents = 4 Lost time incidents = 1
Minimize the release of hazardous substances to the environment	<ul style="list-style-type: none"> Zero reportable releases of hazardous materials to the environment 	<ul style="list-style-type: none"> One reportable release to sanitary sewer
Maintain radiation doses to employees ALARA	<ul style="list-style-type: none"> Maximum annual employee dose ≤ 5 mSv 	<ul style="list-style-type: none"> Maximum annual employee dose = 3.1 mSv

3.3.2. Effectiveness in Implementing Operational Controls and Improving Safety Culture

EHS operational controls are documented in program documentation that employees read and understand. Safety critical steps are added into routine production procedures. These procedures are routinely updated using BWXT Medical's change control process when safety improvements are identified or during scheduled document periodic review.

Derived from safety analysis, the fundamental operational limit and condition is that all nuclear substances are processed in a hot cell, glove box or fume hood, which are exhausted to the Nuclear Ventilation System (NVS), and which have established limits for the activity of a given radionuclide. Nuclear substances must be transferred or stored in containers with the appropriate amount of shielding. In, 2022, BWXT Medical ensured that these limits and conditions were fully complied with.

In January 2022, BWXT Medical conducted a safety culture survey consisting of 65 questions derived from 10 Institute of Nuclear Power Operations (INPO) safety culture traits. Personal accountability scored was the highest scoring trait, and leadership safety values & actions and problem identification & resolution were identified as those that need improvement. Employee focus group sessions were conducted to further inform the appropriate follow-up actions. Senior Leadership owns the Safety Culture Improvement Plan, with all actions to be completed in 2023.

3.3.3. Reportable Events

There were seven (7) reportable events in 2022:

- Two (2) false fire alarms resulting in building evacuation (May and Sept);
- Three (3) incidents of Type A packages damaged in transit (May, Aug and Oct). In all cases, there was no impact to radioactive material and no risk to safety or the environment;
- One (1) serious injury resulting in lost time. See Section 3.3.1 for further details; and
- One (1) non-work related illness requiring paramedic response on-site.

The building fire protection system has been modified to reduce the likelihood of false fire alarms.

3.3.4. Sealed Source Tracking

There have been no receipts, transfers, exports or imports of sealed sources that require reporting.

3.3.5. Non-Production Sealed and Unsealed Source Inventory

BWXT Medical maintains a program to oversee the inventory of non-production radioactive material (i.e., sealed and unsealed sources). The effectiveness of the program is verified through routine inventory checks.

3.3.6. Annual Production

Activities relating to the procurement, possession, processing and shipping of radioactive materials were conducted under the Nuclear Substance Processing Facility Licence.

Data relating to the production of nuclear medicine products is attached in Appendix A.

3.4. Safety Analysis

The Safety Analysis Safety and Control Area covers the maintenance of the safety analysis which supports the overall safety case for the facility. The safety analysis is a systematic evaluation of the potential hazards associated with the conduct of an activity or facility, and considers the effectiveness of preventive measures and strategies in reducing the effects of such hazards. The safety analysis for the Nuclear Medicine Production Facility is documented in a Final Safety Analysis Report (FSAR) that describes the facility and operations, defines the safety requirements and details the hazard analysis. The conclusion of the FSAR is that all safety requirements are met during normal operations as well as during abnormal events.

The safety analysis is underpinned by a robust defence-in-depth strategy. Activity limits for each radionuclide are established based on the systematic evaluation of potential hazards to ensure that safety criteria will not be exceeded during normal operations and credible abnormal events. Passive engineered features such as the hot cells provide a reliable level of containment and shielding for radioactive and other types of hazardous material. Active engineered systems such as the Nuclear Ventilation System, radiation and contamination monitoring systems, and fire protection systems further ensure the protection of workers and the environment. Lastly, personal protective equipment and administrative controls provide a final safety barrier.

Modifications to the facility are made in accordance with the Change Control program, which requires review of EHS parameters for any addition to, or modification of existing processes or facility structures, systems or components. Under this process, a proposed modification is screened for potential impact on the facility safety analysis. Where screening identifies a potential impact, a more detailed review of the proposed modification is conducted to identify if the change impacts a safety system or the basis of the safety assessment (e.g. materials, quantities, locations, etc.).

During the reporting period, there were no changes to the FSAR, SSCs Important to Safety or the overall safety case for the operation of the NMPF.

3.5. Physical Design

The Physical Design Safety and Control Area relates to activities that impact on the ability of systems, structures and components (SSC) to meet and maintain their design basis, given new information arising over time and taking into account changes in the external environment.

Changes made to the physical facility, equipment, processes, procedures or practices that could adversely affect product quality, employee health and safety, the environment or the public as a result of the operation of BWXT Medical's facilities are assessed through the Change Control program.

During the reporting period, there were minor modifications to physical design related to the Tc-99m generator project. This included the modification of hot cells and supporting equipment for radiochemical processing, radiopharmaceutical production, and waste processing. Additionally, the final packaging system for Tc-99m generators was installed.

None of the modifications to the facility affected the ability of existing SSCs to function in accordance with their design intent. All modifications were designed in accordance with applicable building and fire codes and standards.

Commissioning of facility modifications and process validations are ongoing, and are expected to be completed in 2023.

3.6. Fitness for Service

The Fitness for Service Safety and Control Area covers activities that impact the physical condition of structures, systems and components to ensure that they remain effective over time. This area includes programs that ensure all equipment is available to perform its intended design function when called upon to do so.

3.6.1. Effectiveness of Maintenance and Testing Programs

BWXT Medical ensures fitness for service of facility systems and process equipment. As Landlord, Nordion carries out facility maintenance in accordance with the requirements of the BWXT Medical licence.

The maintenance program provides guidelines for the documentation and maintenance of the system to ensure responsibilities are identified, filing systems are maintained and all necessary controls are in place for facility maintenance and equipment calibration.

The Advanced Maintenance Management System (AMMS) is used to control maintenance and calibration activities. AMMS catalogues all systems and equipment requiring calibration or maintenance, records equipment information, schedules maintenance, issues work orders and retains records of inspections and tests.

Detailed processes and rules governing the preventative maintenance program are available in Facilities Master Plan documents.

The maintenance program continues to prove effective as during 2022, there were no systemic facility or equipment failures that affected BWXT Medical operations, safety or security.

3.6.2. Effectiveness of Aging Management Strategies

Aging of facility structures and systems is jointly monitored by senior leadership at BWXT Medical and Nordion. Where there are concerns, facility or equipment condition assessments are performed, and as necessary, improvement projects are developed and approved.

Aging management continues to prove effective as during 2022, there were no structural or system failures that affected BWXT Medical operations, safety or security.

3.7. Radiation Protection

The Radiation Protection Safety and Control Area covers the implementation of the radiation protection program, in accordance with the Radiation Protection Regulations. BWXT Medical has a well-established and effectively implemented radiation protection program, which includes a commitment to ALARA and continuous improvement. The program addresses the radiation hazards associated with manufacturing processes. This program ensures that surface and airborne contamination, as well as radiation doses to employees and the public are monitored and controlled.

3.7.1. Dose Control Data

Radiation dose refers to the energy deposited or absorbed in materials through which it passes. Equivalent dose is used to assess how much biological damage is expected from the absorbed dose. It takes the properties of different types of radiation into account. Effective dose is used to assess the potential for long-term effects that might occur in the future. It is a calculated value, measured in milliSieverts (mSv), which takes into account the absorbed dose to all organs of the body, the relative harm level of the type of radiation and the sensitivities of each organ to radiation. All radiation exposures received by employees in the reporting period were below Administrative Levels, Action Levels and regulatory limits. Action Levels are site specific and are accepted by the CNSC through the facility operating Licence Conditions Handbook. Regulatory limits are specified in the Radiation Protection Regulations.

3.7.1.1. Occupational External Dosimetry

Table 4 provides dosimetry data for employees grouped in various ranges of exposure.

Data on the minimum, maximum and average doses for all employees and contractors are shown in Tables 5, 6 and 7 for effective, skin and extremity doses respectively. Doses are presented since 2019, the first full year of BWXT Medical's operation following the acquisition of the medical isotope business from Nordion. In 2022, all contractors were deemed non-Nuclear Energy Workers (NEWs), subject to an effective dose limit of 1 mSv/yr and a skin or extremity dose limit of 50 mSv/yr.

Table 8 provides a summary of the dosimetry data for 2022.

Where average doses are calculated, doses of zero (0) mSv are included in the calculation unless otherwise noted.

The top 20 doses to employees shown in Appendix C account for 53% of the total collective dose to all employees in 2022.

Table 4 - Personnel Dosimetry

Number of Employees															
Dose range (mSv)	Effective					Lens of the Eye					Skin				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
0	38	63	36	65		37	57	36	64		33	64	39	65	
0.01-1.00	116	134	219	214		116	140	219	215		119	133	216	214	
1.01-5.00	8	7	11	12		9	7	11	12		10	7	11	12	
5.01-10.00	0	0	0	0		0	0	0	0		0	0	0	0	
10.01-20.00	0	0	0	0		0	0	0	0		0	0	0	0	
>20.00	0	0	0	0		0	0	0	0		0	0	0	0	
Number of Employees															
Dose range (mSv)	Extremity (Left Hand)					Extremity (Right Hand)									
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023					
0	42	49	65	60		40	50	71	65						
0.01-1.00	34	45	70	95		29	40	60	83						
1.01-5.00	18	17	21	29		25	21	25	39						
5.01-10.00	1	1	1	4		2	1	1	1						
10.01-20.00	1	1	1	0		0	1	1	0						
>20.00	0	0	0	0		0	0	0	0						

Table 5 - Average, Maximum, Minimum Effective Doses

Dose Range (mSv)	BWXT Medical Employees (mSv)				
	2019	2020	2021	2022	2023
Average	0.20	0.21	0.15	0.17	
Maximum	1.85	2.23	2.41	3.10	
Minimum	0	0	0	0	
# NEWs	162	204	266	291	
Dose Range (mSv)	BWXT Medical Contractors (mSv)				
	2019	2020	2021	2022	2023
Average	0.003	0.012	0.03	0.01	
Maximum	0.07	0.29	0.47	0.36	
Minimum	0	0	0	0	
# Non-NEWs	70	330	249	161	

Table 6 - Average, Maximum and Minimum Skin Doses

Dose Range (mSv)	BWXT Medical Employees (mSv)				
	2019	2020	2021	2022	2023
Average	0.21	0.15	0.15	0.17	
Maximum	1.90	2.28	2.44	3.13	
Minimum	0	0	0	0	
# NEWs	162	204	266	291	
Dose Range (mSv)	BWXT Medical Contractors (mSv)				
	2019	2020	2021	2022	2023
Average	0.004	0.014	0.04	0.01	
Maximum	0.08	0.31	0.95	0.37	
Minimum	0	0	0	0	
# Non-NEWs	70	330	249	161	

Table 7 - Average, Maximum, Minimum Extremity Doses

Dose Range (mSv)	BWXT Medical Employees (mSv) Left Hand				
	2019	2020	2021	2022	2023
Average	0.78	0.68	0.57	0.64	
Maximum	12.92	16.48	12.58	9.87	
Minimum	0	0	0	0	
# NEWs	96	113	158	188	
Dose Range (mSv)	BWXT Medical Employees (mSv) Right Hand				
	2019	2020	2021	2022	2023
Average	0.76	0.67	0.55	0.62	
Maximum	9.37	11.91	10.38	5.17	
Minimum	0	0	0	0	
# NEWs	96	113	158	188	

Table 8 - Summary of Employee Doses in 2022

Dose Range (mSv)	Effective Dose (mSv)	Lens of Eye (mSv)	Skin (mSv)	Left Hand (mSv)	Right Hand (mSv)
0	65	64	65	60	65
0.01-1.00	214	215	214	95	83
1.01-5.00	12	12	12	29	39
5.01 - 10.00	0	0	0	4	1
10.01 - 20.00	0	0	0	0	0
>20.00	0	0	0	0	0
	Effective Dose (mSv)	Lens of Eye (mSv)	Skin (mSv)	Left Hand (mSv)	Right Hand (mSv)
Average	0.17	0.17	0.17	0.64	0.62
Avg. Excl. Zeroes	0.22	0.22	0.22	0.91	0.95
Maximum	3.10	3.11	3.13	9.87	5.17
Minimum	0	0	0	0	0
# Monitored	291	291	291	188	188

3.7.2. Significance of Results for the Dose Control Data

Appendix C contains a trending analysis of doses to employees in each functional group.

3.7.3. Dose to the Public

Table 9 shows the maximum radiation dose to the public from 2022 based on releases to the environment as a percentage of the DRL (see Section 3.9.1). The total releases from the site correlate to a maximum dose to a member of the public of 1.56E-03 mSv in 2022. The dose specifically from operations at BWXT Medical and Nordion is 4.7E-04 mSv and 1.09E-03 respectively.

As described in Section 3.9.1, the releases to the environment are over-conservative estimates, largely based on assuming non-detects in liquid effluent have a concentration equivalent to the Minimum Detectable Activity (MDA). For comparison, the Environmental Risk Assessment (ERA) calculates the theoretical dose to public from current BWXT Medical operations (Y-90 and In-111) to be 6E-10 mSv.

Table 9 - Dose to the Public

Year	Maximum dose to the public from BWXT Medical releases (mSv)	Maximum dose to public from Nordion releases (mSv)	Total maximum dose (mSv)
2021	5.1E-04	1.35E-03	1.85E-03
2022	4.7E-04	1.09E-03	1.56E-03

3.7.4. Contamination Control Data

The contamination control program for the Active Area includes routine sampling and monitoring on a daily basis of the floors, benches, fume-hoods, gloveboxes, support/service areas, and on a weekly basis, change-rooms and inactive floors. Regular sampling, by wipe testing, of the corridors and office areas is conducted several times daily to ensure areas are maintained contamination free and, should contamination be found, to decontaminate immediately to the levels specified in the decontamination procedure. In addition, equipment and personnel leaving the Active Area are monitored for contamination.

The number of contamination incidents in 2022 are shown in Table 10, Table 11 and Figure 5. There was a large increase in the number of contamination incidents compared to last year, 86 in 2022 versus 22 in 2021.

This was almost entirely due to the Tc-99m generator development project which accounted for 63 of the incidents which debuted in February. The contamination incidents listed in Table 11 under Mo-99 include Tc-99m and associated impurities (Nb-92m, Co-60, etc.).

The other predominant radionuclides, Y-90 and In-111, are associated with the two commercial manufacturing processes at BWXT Medical. Other contamination incidents were associated with the preparation for disposal of legacy liquid waste.

Of the 86 contamination incidents, 24 involved skin contamination of personnel. The vast majority of contamination incidents involved personnel working at containment facilities (typically fume hoods, under cells or at cell doors – areas of known contamination). Many recorded incidents of contamination involve contamination of workers PPE or clothing, but not the skin. Skin doses varied between 2 µSv to 883 µSv, with an average of 80 µSv. If the duration of skin contamination is uncertain conservative values are applied.

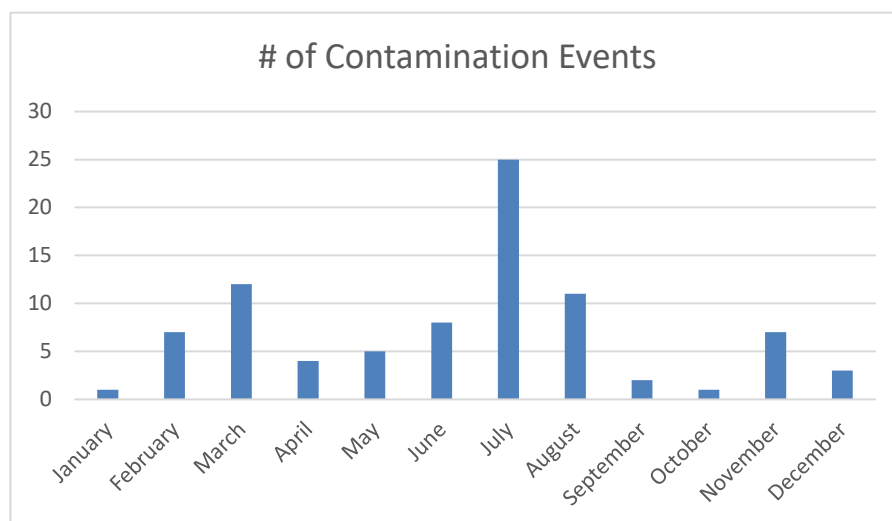
Table 10 - Contamination Incidents by Contamination Level

Year	Not recorded	<500 cpm	>500 cpm, <2,000 cpm	>2,000 cpm, <10,000 cpm	> 10,000 cpm, < 50,000 cpm	>50,000 cpm	Annual Total
2021	1	3	10	4	3	1	22
2022	0	34	22	21	7	2	86

Contamination of floors in Bq/cm² varied as follows: 2, 5, 5.1, 10, 11, 11, 13.9, and 44 Bq/cm². Only one instance was above the Active Area Contamination limits of 37 Bq/cm², so although only one of the floor contaminations is technically a contamination incident as defined by the Radiation Protection Manual it is standard practice to record the discovery of unexpected contamination.

Table 11 - Contamination Incidents by Radionuclide

Radionuclide	Number of incidents
Y-90	13
Mo-99	63
In-111	6
Legacy Waste	4
Total	86


Figure 5: Contamination Incidents by Month

The frequency of occurrence of contamination events by month closely follows the implementation of the Mo-99/Tc-99m generator process which began development runs with radioactive material in February. The process debuted only in the Radiochemical wing of the building and we see an increase in contamination events followed by a subsequent reduction. In the summer months these development activities were introduced into the Radiopharmaceutical wing. It is apparent that the number of contamination events is correlated to the newness of the various stages of the process as they are implemented across the facility. Mo-99 related contamination events were discussed at daily planning meetings and huddles for lessons learned. Development runs ended in August and some waste activities continued in November. For other processes there was a year over year difference of only 1 event (22 events in 2021 versus 23 unrelated to Mo-99 in 2022). Therefore, the only discernable trend is due to the introduction of a new process.

3.7.5. Facility Radiological Conditions

The radiation survey program involves radiation measurements within the Active Area, and on the perimeter and exterior of the KOB. Within the Active Area, radiation surveys are generally conducted daily, throughout all the labs and rooms. Areas where radiation fields are above 2.5 mrem/hr (0.025 mSv/hr) are posted with radiation warning signs, indicating the radiation fields. In addition, surveys are conducted at employee work areas, at cells, glove-boxes, and fume-hoods, during production and test operations, to ensure radiation fields during processing are within acceptable levels. Special surveys are conducted on new processes/equipment to provide information on the safety performance of new operations.

On a monthly basis, radiation surveys have been conducted on the perimeter of the Active Areas, and within the Inactive Office Areas. The monthly survey also includes measurement of radiation fields outside the KOB to ensure conditions have not changed in the operations that may impact the environment/exterior exposure. All the monthly surveys were conducted in 2022.

Breathing air was monitored using Continuous Air Monitor (CAM) and 24-hour air samplers. In addition to having the capability of alarming locally, CAMs are monitored and logged at the Surveyor's control panel and on the Building Management System (BMS). The 24-hour air filters are measured daily. In 2022, some 24-hour air filters could not be changed out routinely due to construction activities, but this was a smaller number than in 2021 as construction activities wound up in the various rooms. In all cases this was appropriate as there was no manipulation of radioactive material in the rooms at the time when there was no monitoring present.

For work known to have the possibility of creating radioactive contamination of the breathing air, a zone is demarcated, and signage is posted requiring respirators to be worn. There were three instances of airborne in 2022 associated with development runs of Mo-99, however signage was in place prior to the events and personnel were wearing respirators (no measurable inhalation occurred). The airborne concentrations were below investigation levels (<5% DAC). Although below formal investigation levels procedural changes were identified and implemented to correct the situation until the process was redesigned (process redesign has been completed).

Respirator requirements are removed only once air monitoring measurements are below the required levels. In 2022, all breathing air sampling was performed in accordance with procedures and results indicated that processes were controlled.

Facility radiological conditions were very stable and routine throughout the year.

3.7.6. Exceeding Regulatory Limits or Action Levels

In 2022, there were no exceedances of either regulatory limits or Action Levels.

3.7.7. Radiation Protection Program Effectiveness

The Radiation Protection (RP) Program is reviewed by conducting process audits and process safety audits. Data and performance of the RP Program is also reviewed regularly at EHS Committee meetings. The RP Protection program continued to operate effectively in 2022.

3.7.8. Radiation Protection Program Improvements

The RP Program continues to effectively ensure radiation safety for all workers. No significant improvements to RP processes were made in 2022.

3.7.9. Radiation Protection Program Performance

The objectives, goals and targets of the RP Program are shown in Section 3.3.1. The target for maximum NEW dose was met in 2022. These targets are tracked as key performance indicators at EHS Committee meetings and in Monthly Operational reports. The targets are reviewed yearly at the Annual Management System for Safety Review.

For 2023, the target maximum annual effective dose to an employee will be 4.5 mSv/yr, a decrease of 10% from the 2022 target.

3.7.10. Continuous Improvements under ALARA Performance

ALARA objectives and performance is reviewed at EHS Committee meetings. Safety is integrated into the design aspects of new builds, from design objectives, design review and to performing Hazard Risk Analysis of process flows.

As examples, two ALARA-based initiatives to reduce doses to workers that were identified and implemented were:

1. Combined packaging line for Y-90 and In-111
 - The handling of packages is known to be the predominant historical contributor to the highest doses to employees. Engineered features were added to the packaging line to automate much of the storage, retrieval and packaging of final product pots. With greater automation and less direct handling, it is expected that doses to employees will be lower during the packaging process. The optimization of this process is continuing in 2023 with the addition of localized shielding where packages accumulate.
2. Multiple improvements to Mo-99 process
 - Design review of process improvements to improve ergonomics and minimize the possibility of contamination began in the fall of 2022 and continues into 2023. Many process improvements have been implemented and all safety important items will be in place before returning to active processing in 2023.

3.7.11. Radiation Devices and Instruments Performance

As listed below, performance of radiation devices and instruments is checked at various frequencies throughout the year. If operating specifications are not met, corrective maintenance is performed and the device or instrument is verified again prior to its return to service.

The following have been verified on a routine basis:

- Existing NVS High Efficiency Particulate Air (HEPA) Filter and Charcoal Adsorber (CAD) Testing: all HEPA filters and CADs in the NVS required for operations were tested twice in 2022. Fifty (50) HEPA filters were installed and tested once in new ventilation systems in the KRMF wing for room and containment ventilation of new infrastructure for the Mo-99 project. Seven (7) of the new HEPA filters failed in-situ testing, were replaced, retested and passed before radioactive material was introduced into that part of the facility. The required specification for filtration efficiency was met in all cases.
- Back-up Power: emergency diesel generators were tested monthly and confirmed to be operational.
- Radiation Evacuation Alarms: the intermittent klaxon indicating a high radiation field from Cobalt Operations was tested weekly and confirmed to be operational.
- Radiation Alarms: local radiation alarms at various locations in the manufacturing area are tested on a weekly basis, including a verification of the alarms on the Building Management System (BMS).
- Fire Suppression Systems: sprinkler systems are tested monthly and confirmed to be operational.
- Fire Alarm Panels: fire alarm panels are tested monthly and confirmed to be operational.
- Contamination and Area Monitoring Equipment: preventive maintenance was performed on handheld contamination meters twice in 2022. Hand and foot monitors were calibrated twice in 2022 and tested weekly. Area radiation monitors are verified daily.
- Environmental Monitoring Equipment: air sampling pumps are tested on a weekly basis.
- Radiation Survey Instruments: survey meters are tested on a monthly, bi-annual or annual basis as required.

3.7.12. Radiation Protection Training Program and Effectiveness

Every employee and contractor who works in the Active Area are required to first pass a radiation protection course. The course provides each participant with a detailed description of radiation hazards, the associated potential consequences to human health and the control measures implemented in accordance with the ALARA principle.

All required radiation protection training was completed as required in 2022. Refresher training is provided on a 3-year cycle. Training has proven to be effective in ensuring workers understand the hazard and protect themselves and others accordingly.

3.8. Conventional Health and Safety

3.8.1. Conventional Health and Safety Program Effectiveness

The Conventional Health & Safety Program is reviewed by conducting program audits, process audits, regular inspections by both employees and management, and a review of revised safety programs is performed by the Workplace Health & Safety Committee. The Workplace Health & Safety Committee is also responsible for reviewing the Hazard Prevention Program. In addition, the EHS Committee sets targets each year that are used to monitor the effectiveness of the safety program.

Targets were established for medical treatment incidents (≤ 2) and zero lost time incidents. In addition, Near Miss Reports and Hazard Identification Reports are tracked and are reported monthly to senior management and are provided to the Workplace Health & Safety Committee for review.

Refer to Section 3.1.3 for a list of audits and inspections conducted in 2022.

Overall, the programmatic elements have proven to comprehensively ensure occupational health and safety. However, given the number of incidents in 2022, the effectiveness of implementation must be improved. A list of improvements initiated in 2022 is provided in Section 3.8.3 and further improvements will be considered in 2023 (see Section 3.1.2).

3.8.2. Conventional Health and Safety Committees

BWXT Medical's objective is to eliminate or minimize as low as reasonably achievable both known and potential environmental, safety and health hazards that could impact our employees and contractors.

BWXT Medical's Workplace Health and Safety Committee is comprised of union and management representatives, and typically meets monthly. Minutes of each meeting are distributed to all employees.

The committee met 10 times in 2022, and accomplished the following:

- Reviewed performance data related to occupational health and safety against objectives and targets (see Section 3.3.1);
- Performed workplace inspections;
- Procured equipment and materials to address identified hazards and concerns;
- Implemented administrative features such as signage and labelling to improve safety;
- Contributed to the development of company policies related to health and safety; and
- Ensured the completion of actions raised during committee meetings.

3.8.3. Conventional Health and Safety Improvements

The most significant improvements to health and safety will correspond to the elimination of hazards or the incorporation of engineered safety features to mitigate hazards. In 2022, this philosophy was executed in the operation of a combined packaging line for the Y-90 and In-111 manufacturing processes. This packaging line automates a number of the formerly manual activities associated with packaging including box erection and taping, and foam compression.

BWXT Medical is committed to the use of technology to further prevent or reduce the likelihood of injuries in the workplace. For example, the packaging line for the Tc-99m generator process was installed in 2022 and will be commissioned in 2023.

Based on the results of the 2022 Safety Culture Survey, actions have been established to improve safety culture across the organization. These actions predominantly address active leadership, communication, resource planning for large projects, and design review by end users. See Section 3.3.2 for further details.

3.8.4. Conventional Health and Safety Occurrences

There were four (4) medical treatment (only) injuries in 2022, which exceeded the target of two (2), an equalled the total in 2021. All four injuries were strain injuries, three resulting from lifting materials and one resulting from manipulator work.

There was one lost time injury when an employee was operating a hand drill to load a pail into a waste bunker. The drill kicked back and made contact with their head and fingers. The resulting lost time was 26 days. The 2022 severity rate was 9.65 and the frequency rate was 0.37. The waste bunker loading mechanism is being re-designed to minimize operator intervention and further mitigate the associated hazards.

3.9. Environmental Protection

The Environmental Protection Safety and Control Area covers programs that monitor and control all releases of nuclear and hazardous substances into the environment as well as their effects on the environment as a result of licensed activities.

BWXT Medical has an effective environmental protection program in place which identifies and controls environmental aspects and drives continuous improvement to enhance performance and minimize risk to employees and the public. The facilities have well-established environmental management systems to ensure effective monitoring programs are in place to achieve environmental goals and regulatory compliance.

3.9.1. Air and Water Release Monitoring

The environmental monitoring program is designed to monitor and measure effluent releases to the environment and to determine exterior radiation levels. The program includes the following elements:

- a) Continuous monitoring of process ventilation, exhausts ductwork and stack emissions by use of in-situ detectors and samplers and computerized recording
- b) Weekly air sampling and analyses for exhaust stack emissions
- c) Holding tanks for Active Area liquid effluent to allow sampling, analysis and authorized release of liquid effluent
- d) Environmental TLD program
- e) Soil sampling

Exhaust stack sampling is conducted by using particulate and/or activated charcoal filters depending on the physical and chemical nature of the radionuclide. Radioiodine sampling involves the use of activated charcoal filter cartridges and analyses by gamma measurement. Particulates are sampled by use of cellulose filter papers and analyzed by gamma measurement.

All production operations are contained within cells, gloveboxes and/or fume-hoods. Ventilated air from these containment systems is filtered through roughing and HEPA filters and, where appropriate, activated charcoal absorbers. These systems are designed with redundant fan/motor

and filtration units that include pre-filters, primary and secondary filtration units. The NVS has been designed and is maintained to prevent the unnecessary release of radioisotopes to the atmosphere.

There are a number of quality assurance and quality control processes to ensure that accuracy of effluent and environmental monitoring data. For air emissions this includes periodic duplicate analysis of stack air samples using independent methods, data entry verification procedures, and stack leak testing. For water effluent, this includes periodic duplicate analysis of samples using independent methods, data entry verification and approval prior to discharge, and trip blanks and replicate samples when samples are sent for independent analysis.

3.9.1.1. Airborne Emissions

Based on weekly air sampling of all exhaust stacks, there was one detectable airborne release of $1.7\text{E-}05$ GBq of Co-60, which is near the detection limit, to the environment from the BWXT Medical facility in 2022. This occurred during the early development phase of Mo-99 during planned rework of the ventilation system and as such is unlikely to recur. The contribution to DRL from this one-time air release was $6.7\text{E-}6\%$ of the DRL (resulting in a theoretical dose to public of $6.7\text{E-}8$ mSv).

For non-radiological, hazardous substances, BWXT Medical operations were well below the production limits specified in the BWXT Medical Environmental Compliance Approval (ECA) from the Ministry of the Environment, Conservation and Parks.

3.9.1.2. Liquid Effluent

Wastewater from the Active Area that could have low-level radioactivity (Emergency showers, Active Area personnel wash sinks, etc.) is collected in underground delay tanks. The wastewater in the tanks is sampled, analyzed and compared to internal administrative levels. All results are reviewed and must be approved by Radiation Safety prior to discharge into the city sewer system. The City of Ottawa is informed whenever a release to the sanitary sewer takes place. In addition, a monthly summary report of the activity levels released is submitted to the city.

In 2022, eight measurements out of 318 of liquid effluent resulted in a concentration above the Minimum Detectable Activity (MDA); 97.5% of the measurements of liquid effluent had no detectable radioactivity. These eight measurements were all less than an order of magnitude above the MDA. BWXT Medical employs a conservative practice of assuming the concentration is equal to the MDA for non-detects in liquid effluent. Therefore, the total activity in liquid releases closely followed release volumes.

The liquid effluent monitoring results indicate a dose to the public that is based on activity values which were over-estimated by a factor of ten (10) at a minimum. Due to the conservative approach, the estimated dose to the public from liquid effluent is greatly over estimated.

There was one reportable release of a hazardous (non-radiological) substance to the sanitary sewer. An unmarked container with a small amount of left-over transparent mineral oil was used to collect a roof leak. The contents was incorrectly assumed to be solely water and was dumped directly down the drain. The release was reported to the City of Ottawa in accordance with the Sewer Use By-law.

Table 12 - Liquid Releases (GBq)

Liters	$\beta < 1\text{MeV}^*$	$\beta > 1\text{MeV}^*$	I-125	I-131	Mo-99	Co-60
414163	0.202	0.039	0.026	0.005	0.035	0.006

DRL (GBq/yr)	763	35,000	1,190	389	10,200	35.4
% DRL	2.64E-02	1.12E-04	2.22E-03	1.22E-03	3.43E-04	1.64E-02
* $\beta < 1\text{MeV}$ Ni-63 DRL value used, $\beta > 1\text{MeV}$ Y-90 DRL used						

3.9.1.3. Environmental TLDs

Radiation fields at exterior locations both within and beyond the site boundaries, as well as in certain locations inside the KOB are measured using environmental TLDs.

All environmental TLD measurements were well below the annual public limit of 1 mSv. The similarity in the recorded dose in these locations year over year, taken with the absence of any contamination found in soil illustrates that the variation between locations is due to variations in natural background radiation at these locations.

Table 13 - Environmental TLDs

Location		2022 (mSv)
16	RE Building	0.135
17	Pole, North Corner	0.137
18	Heating Plant Roof	0.358
19	Hydro Pole, South West	0.08
20	Local Business	0.088
32	Residence	0.105
33	Residence	0.044
38	Residence	-0.053
57	Residence	0.07
58	Local Business	0.084

3.9.2. Exceeding Regulatory Limits or Action Levels

There were no instances of exceeding CNSC environmental regulatory limits or action levels in 2022.

3.9.3. Spills to the Environment

There were no spills to the environment in 2022.

3.9.4. Environmental Protection Program Effectiveness

Based on the negligible risk to the environment as justified in the BWXT Medical Environmental Risk Assessment (ERA) and confirmed through measurements of nuclear substances in effluent and environmental monitoring, the Environmental Protection Program is effective at preventing pollution and protecting members of the public.

3.9.5. Environmental Protection Program Activities

Routine environmental inspections were conducted and any concerns were identified and resolved.

3.9.6. Environmental Protection Program Improvements

Composite sampling of sanitary sewer discharges for most parameters began in 2022. This was an identified improvement initiative to ensure that representative samples were analyzed and compared against the City of Ottawa Sewer Use By-law. This method of sampling is in line with City of Ottawa recommendations. There were no exceedances of the By-law during routine sanitary sewer monitoring.

3.9.7. Environmental Protection Program Performance

The key metrics for the performance of the Environmental Protection Program are presented in Section 3.3.1.

3.9.8. Soil Sampling

Soil samples are regularly taken and analyzed from various locations on the property to test for the presence of radioisotopes and to detect potential soil contamination.

Soil samples were taken at 19 locations around the site in October 2022. Samples were placed in plastic bags, labeled with the site location and analyzed on the Multi-channel Analyzer (MCA) for 8 hours. Background measurements (no sample, empty chamber) were also taken for reference. There were no gamma-emitting radionuclides detected in any soil samples associated with BWXT Medical operations.

3.10. Emergency Management and Fire Protection

3.10.1. Emergency Preparedness Program Effectiveness

As evidenced by the exercises and drills conducted in 2022, the Emergency Preparedness Program continues to be effective in ensuring that the joint emergency response capability of BWXT Medical and Nordion protects workers, the public, the environment and as much as practicable the facility in the event of an emergency. Further details regarding drills and exercises are provided in the next section.

3.10.2. Emergency Preparedness Program Activities

BWXT Medical has implemented and maintains an Emergency Management Program to meet regulatory requirements. Each drill and exercise is planned with defined objectives, and outcomes are assessed and considered for continual improvement.

As part of the Emergency Management Program, there is an onsite emergency plan and established organizational structure for clear allocation of responsibilities, authorities, and arrangements for coordinating onsite activities and cooperating with external response organizations throughout all phases of an emergency.

A triennial full-scale exercise was conducted in October 2022, which tested the fire and radiation emergency response plans and capabilities. The exercise included participation by first responders and confirmed that the emergency response organization is qualified and prepared for large-scale facility emergencies. The exercise was observed by the CNSC as part of an on-site inspection.

The Emergency Preparedness Program was audited externally (by the CNSC) and internally. Audit results are summarized in Section 3.1.3. Overall, the program was found to be compliant with regulatory requirements.

Additionally, a chemical spill response drill was conducted to test on-site response by qualified employees.

3.10.3. Emergency Preparedness Program Improvements

There have not been any recent changes to the Emergency Preparedness Program. One recommendation raised from the CNSC inspection and internal audits was to ensure that training is completed on time. Overall, training completion improved over 2022 and is a focus area for 2023.

3.10.4. Fire Protection Program Effectiveness

The Fire Protection Program, specifically the elements of fire prevention, proved to be effective as there were no fire incidents in 2022.

Additionally, as described in the following section, independent third party assessments of the existing facility concluded that fire hazards are adequately mitigated by the existing fire protection systems.

3.10.5. Fire Protection Program Activities

BWXT Medical maintains a Fire Protection Program to meet regulatory requirements. The Fire Protection Program is implemented and integrated into facility operation in a controlled and coordinated manner to ensure that BWXT Medical is able to respond efficiently and effectively to emergency fire situations.

The objective of the Fire Protection Program is to minimize the probability and consequences of a fire and to promote life safety, the conservation of property and essential equipment, the protection of the environment and the continuity of operations through provisions of fire prevention and fire protection measures. This is achieved through appropriate fire protection system design, fire safety analysis, fire safe operation and fire prevention.

Supplementing the Fire Protection Program is a Fire Safety Plan which describes emergency procedures and the Emergency Response Organization (ERO) in the event of a fire.

Under the lease agreement, Nordion maintains all fire protection systems within the BWXT Medical facility. BWXT Medical employees are responsible for following all fire protection procedures.

Fire Inspections for all areas of the leased BWXT Medical spaces are done at least twice a year.

3.10.6. Fire Protection Program Improvements

There were no changes to the overall Fire Protection Program in 2022. To address the two false fire alarms in 2022, specific components in the fire suppression and alarm systems were replaced to minimize the likelihood of a false alarm.

3.11. Waste Management

The Waste Management Safety and Control Area covers management of radioactive, hazardous and non-hazardous waste as part of facility operations, up to the point where the waste is removed from the facility to an approved waste management facility.

Radioactive wastes are any materials that contain a nuclear substance and which have been declared to be waste. BWXT Medical has an effective radioactive waste disposal program that ensures all radioactive waste disposals are compliant with the Nuclear Safety and Control Act and associated regulations and the facility licence conditions.

3.11.1. Effectiveness of Waste Segregation and Minimization

BWXT Medical's production facilities have been designed and operated in a manner to prevent radioactive waste being released to municipal garbage or the environment as airborne emissions or waterborne effluent. All radioactive waste that is generated through production operations is collected and sent to a CNSC-approved radioactive waste management facility.

BWXT Medical has designated space and processes to store and segregate radioactive waste. Long term decay storage areas are located in the KOB active shipping/receiving facility. Space is also designated for storage of containers and management of waste being prepared for shipment to approved waste management facilities.

BWXT Medical's non-hazardous waste diversion rate in 2022 was 70.1%.

3.11.2. Waste Shipments

Appendix B provides a summary of solid waste material for each of the major radioisotope waste streams and liquid waste shipped to a licensed waste management facility in 2022.

3.11.3. Waste Management Program Performance

Overall waste is well managed by diverting the majority of waste from landfills, and by characterizing and segregating hazardous and radioactive waste to support optimal disposal methods. Legacy solid wastes have been transferred to a licensed waste management facility in 2022, supporting initiatives to minimize waste stored in the facility.

3.11.4. Waste Management Program Improvements

BWXT Medical is in the process of further compacting waste where practicable to support radioactive waste volume reduction. Additional compacting is expected to begin in 2023.

3.12. Security

The Security Safety and Control Area covers the programs required to implement and support the security requirements stipulated in the regulations and in the facility licence.

The facility maintains a security program in accordance with the General Nuclear Safety and Control Regulations, Class I Nuclear Facilities Regulations, and the Nuclear Security Regulations. The Security Plan outlines the systems, processes and responsibilities for performing security operations with the objective of maintaining safe and secure facilities. The Security Plan describes the physical security features and details the individual roles and responsibilities for implementation and maintenance of the program. The Security Plan is Prescribed Information and confidential and was submitted to the CNSC.

3.13. Safeguards and Non-Proliferation

BWXT Medical has a safeguards program that meets the safeguards requirements of the CNSC regulatory document REGDOC 2.13.1-Safeguards and Nuclear Material Accountancy, CNSC Nuclear Non-Proliferation Import and Export Control Regulations, Nuclear Safety and Control Act and General Nuclear Safety and Control Regulations.

3.13.1. Safeguards Program Effectiveness and Performance

In 2022, BWXT Medical did not have non-conformances related to safeguarded material after conducting a physical inventory.

3.13.2. Safeguards Program Improvements

There were no significant improvements to the safeguards program in 2022.

3.13.3. Safeguards Inspections

In 2022, BWXT Medical was selected for the IAEA Physical Inventory Verification. The IAEA concluded that all declared nuclear material was accounted for and that there were no indications of the undeclared presence, production or processing of nuclear material.

3.14. Packaging and Transport of Nuclear Substances

BWXT Medical has a packaging and transport of radioactive materials program that is applicable to the packaging and transport of nuclear substances and radiation devices to and from the licensed facility.

BWXT Medical routinely ships nuclear medicine products in Type A packages. BWXT Medical also ships waste materials in either Type A or Type B packages, and empty containers as Excepted packages. Shipments of BWXT Medical products are made via road and air. Shipments of waste are routinely made via road transport.

The program applies to design, production, use, inspection, maintenance and repair of packages, and the preparation, consigning, handling, loading, carriage, storage during transport, receipt at final destination, and unloading of packages. It applies to various types of packages including Type A, Type B, and Excepted packages. The program meets the regulatory requirements from the CNSC, IAEA, US Department of Transportation, and US Nuclear Regulatory Commission.

There were three (3) incidents of Type A packages damaged in transit (May, Aug and Oct 2022). In all cases, there was no impact to radioactive material and no risk to safety or the environment. All incidents were reported to the CNSC as required.

4. Other Matters of Regulatory Interest

4.1. Public Information Program

Throughout 2022, BWXT Medical carried out the activities listed in the Public Information and Disclosure Program and Indigenous Engagement (PIDPIE) to meet the engagement needs of the community.

4.1.1. Website

BWXT Medical regularly updates its public website (medical.bwxt.com) to ensure current information is made available to the public.

The following items were updated/added to the website in 2022:

- 2021 Annual Compliance Report;
- Disclosure of packaging incidents and building evacuations due to false alarms;
- November 2022 community newsletter; and
- Community Webinar.

4.1.2. Engagement

Keeping Indigenous communities, elected officials, community members and stakeholders informed is a priority at BWXT Medical. Throughout 2022, efforts were made to ensure that information was made available to interested parties and that there were opportunities for two-way dialogue.

BWXT Medical maintains its contact list, which is used to share regular email updates. Community members and other interested groups can sign up to join these email updates anytime by contacting the company at isotopequestions@bwxt.com.

In November 2022, BWXT Medical held a Community Webinar. Invitations to the webinar were sent via email updates and targeted Facebook advertising. The webinar was attended by a few individuals and no concerns were raised. The recording is available on BWXT Medical's public website (medical.bwxt.com) through YouTube.

4.1.2.1. Indigenous Engagement

Given the operations in the Kanata facility are conducted on the traditional unceded territory of the Anishinaabe Algonquin People, BWXT Medical is committed to communicating and engaging with local, interested Indigenous communities in a timely, transparent and meaningful way.

Throughout the licence application process in 2021, there were two Indigenous Communities that expressed interest in BWXT Medical: Algonquins of Pikwàkanagàn First Nation (AOPFN) and Kebaowek First Nation (KFN).

In 2022, BWXT Medical representatives met with AOPFN multiple times in person and by video conference. These meetings served as valuable opportunities to establish a meaningful dialogue. Additional engagement activities with AOPFN included:

1. Senior Leadership attending Cultural Awareness Training at AOPFN;
2. Supporting multiple cultural protection initiatives;
3. Attending a workshop chaired by AOPFN regarding the future of radioactive waste disposal in Canada; and
4. Attending the annual Pow Wow at AOPFN.

In 2022, BWXT Medical had E-mail communication with KFN, established the point of contact, and addressed the need for transparency by sharing EHS program documents as discussed during the licence hearing in 2021.

4.1.2.2. Government Engagement

BWXT Medical engages with all levels of government in the Kanata area to ensure open communication and awareness of the operations in their ridings.

In 2022, BWXT Medical contacted all elected officials to inform them of the newly appointed President for the company and to provide an update on the Tc-99m generator project.

4.1.2.3. Community Engagement

Throughout 2022, BWXT Medical utilized a variety of communication channels to provide information to its neighbours, including emails to its contact list (which includes interested members of the public who have signed up for updates), a community newsletter, social media, and Facebook targeted advertising. Links, invitations and attachments were included in these updates to make sure information was readily available.

In 2023, BWXT Medical plans to conduct a community survey to be better informed of the knowledge and perceptions of its neighbours.

4.1.3. Public Advertisements & Social Media

BWXT Medical uses a variety of communications tools and methods to ensure information is available to a wide audience. In advance of BWXT Medical's Community Webinar in November 2022, Facebook targeted advertising was used to promote the event.

Social media is another tool used by BWXT Medical. In 2022, multiple posts were shared on BWX Technologies platforms: changes to the BWXT Medical Leadership Team, updates on the Tc-99m generator project, recent announcements, YouTube videos, news releases and more.

4.1.4. Community Volunteerism & Investment

In June 2022, a group of BWXT Medical employees volunteered their time to support Kanata Race Day, with proceeds going towards a local recreation complex.

Additionally, BWXT Medical provides funding to local organizations in the community. In 2022, bursary awards were created at Algonquin College for students in the Biotechnology – Advanced Diploma program and at University of Ottawa to support students in Mechanical Engineering and Science, Technology, Engineering and Math (STEM) programs.

4.1.5. Inquiries

BWXT Medical's PIDPIE representatives can be reached via a variety of methods. These methods include the company's toll-free telephone number (1.833.657.4565), designated email address (isotopequestions@bwxt.com), website (medical.bwxt.com), traditional mail, and in person (when applicable). Contact information is included on all communications.

BWXT Medical did not receive any inquiries from the public in 2022.

4.2. Cost Recovery

The CNSC recovers the cost of regulating from applicants and licensees through the CNSC Cost Recovery Fees Regulations. BWXT Medical is current on its cost recovery payments to the CNSC.

4.3. Financial Guarantees

CNSC staff have confirmed that BWXT Medical's proposed financial guarantee instruments are acceptable and meet the expectations set out in G-206, Financial Guarantees for the Decommissioning of Licensed Activities. The financial guarantee is distributed in the form of a Letter of Credit and a Surety Bond. The CNSC confirmed receipt of both financial guarantee instruments on November 18, 2021.

BWXT Medical attests that the financial guarantee remains valid, in effect and adequate to fund the full decommissioning of the facility.

4.4. Improvement Plans and Future Outlook

BWXT Medical remains committed to continuously improving its EHS programs to minimize risk to employees, the public and the environment. Overall, commercial operations are projected to remain consistent in 2023, with modest growth.

The primary EHS area for improvement is conventional health and safety, particularly to prevent musculoskeletal injuries. Key actions include emphasizing the need for employees to report early discomfort and re-assessing the manipulator components to determine if more ergonomic alternatives are feasible. Concurrent with these initiatives is the implementation of improvement actions to augment the safety culture throughout the organization.

In 2023, BWXT Medical plans to complete validation of the process to manufacture Tc-99m generators and intends on beginning commercial production in 2024. The operation of this new manufacturing process has been confirmed to be within the existing licensing basis; and therefore, there will be no significant changes to EHS programs.

5. Concluding Remarks

BWXT Medical is committed to the establishment and continuous improvement of a healthy safety culture. Safety culture refers to the core values and behaviours resulting from a collective commitment by our company's leaders and individuals to emphasize safety, quality, ethics and security over competing goals to ensure protection of employees, the public and the environment. It is a top business priority to continuously improve our EHS systems to protect fellow employees, the environment, and our communities against environmental, health and safety hazards. BWXT Medical management recognizes, reviews, prioritizes and controls workplace hazards and ensures compliance with applicable regulatory requirements, applicable codes and company policies.

Governed by an integrated management system, conventional health and safety, radiation protection and environmental protection programs are well implemented. All radiation dose measurement results were below internal administrative levels and regulatory limits. Environmental protection programs are well implemented, continuing to ensure negligible risk to the environment and members of the public from BWXT Medical operations.

All production and possession limits were respected. Transportation of dangerous goods was conducted safely between suppliers, customers and waste vendors without risk to workers, the public or the environment.

This annual compliance monitoring and operational performance report demonstrates that BWXT Medical has successfully met the requirements of the Nuclear Safety and Control Act, its regulations and BWXT Medical's CNSC Class IB Nuclear Substance Processing Facility Licence requirements.