Nuclear Energy Canada Inc.

1160 Monaghan Rd.
Peterborough, Ontario Canada

ANNUAL COMPLIANCE MONITORING REPORT

January 1- December 31 2025

The information contained in this report concerns the performance and operation of BWXT Nuclear Energy Canada Inc.'s (BWXT NEC) Class IB nuclear fuel facility located in Peterborough, Ontario. This report is prepared to meet nuclear fuel facility licence FFL-3620.00/2030 condition 3.2. The content demonstrates adherence to the BWXT NEC commitment to operate a safe Class IB nuclear fuel facility, as well as demonstrate compliance with applicable regulations and licence conditions specified by the Canadian Nuclear Safety Commission.

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1 EXECUTIVE SUMMARY

BWXT Nuclear Energy Canada Inc. (BWXT NEC) is a leading supplier of nuclear fuel and services to the Canada Deuterium Uranium (CANDU®) industry. BWXT NEC produces nuclear fuel bundles used by the CANDU fleet to generate clean electricity that powers homes, business, and the Canadian economy. BWXT NEC operates in three plant locations: Arnprior, Toronto and Peterborough, Ontario. BWXT NEC's Toronto and Peterborough facilities are Class IB nuclear facility operations. The Licence issued by the Canadian Nuclear Safety Commission (CNSC) authorizes BWXT NEC to operate and modify its nuclear fuel facility to produce natural and depleted uranium dioxide (UO_2) pellets and to produce and test fuel bundles in Peterborough at 1160 Monaghan Rd. The facility is additionally authorized to receive, repair, modify and return contaminated equipment from off-site nuclear facilities.

The purpose of this annual compliance report is to demonstrate that BWXT NEC Peterborough has successfully met the requirements of the *Nuclear Safety and Control Act*, associated regulations, and the Class IB Nuclear Fuel Facility Licence FFL-3620.00/2030 issued by the CNSC on January 1, 2021, and expiring on December 31, 2030. This report is prepared based on the CNSC's regulatory document REGDOC-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 NEC is committed to continuously improving systems to protect employees, the environment, and communities against environmental, health and safety hazards. We work to implement programs to conserve natural resources, prevent pollution and minimize waste. Maintaining a safe and healthy work environment for our employees is a top business priority. BWXT NEC has implemented a business management system that defines the requirements of the Quality Assurance (QA) program for the licensed activity, which ensures applicable buildings and facilities, equipment, and processes used in support of licensed activities are conducted in accordance with the *Nuclear Safety and Control Act*, associated regulations, applicable CNSC requirements, jurisdictional requirements, and best practices.

No significant operational changes occurred. Upgrades were made to programs with the objective of achieving continuous improvement and environmental health and safety excellence. Details are provided in the main sections of this report. Changes made to the physical facilities, equipment, processes, procedures, or practices that could impact employee health and safety, the environment, or the public as a result of the operation of the facility are assessed through the business-wide Change Control program.

BWXT NEC has established CNSC accepted Action Levels for various radiological and environmental parameters. An Action Level is defined in the *Radiation Protection Regulations* as "a specific dose of radiation or other parameter that, if reached, may indicate a loss of control of part of a licensee's Radiation Protection Program, and triggers a requirement for specific action to be taken." Action Levels are also applied to environmental protection. Action Levels are facility-specific and set below regulatory limits; however, exceedances are CNSC reportable events. Accordingly, BWXT NEC has established Internal Control Levels for various radiological and environmental parameters that are set even lower than Action Levels to act as an early warning system. Internal Control Level exceedances result in internal investigation and correction and are not CNSC reportable events.

Employee workplace radiation exposures are measured by CNSC approved methods and systems. Overall, dose trends have remained steady over a five-year period. Dose reduction remains a priority, with continued efforts focused on shielding improvements, material movement practices, strengthening ALARA awareness (e.g., ALARA training), and ensuring Thermoluminescent

Dosimeter (TLD) wear and storage compliance. All measured personnel radiation exposures during the reporting period were within regulatory limits and Action Levels. One Internal Control Level exceedance for whole body dose occurred in Q1; the event was documented and investigated, and corrective actions were assigned and implemented.

BWXT NEC has established conventional health and safety programs to manage the non-radiological workplace safety hazards to protect personnel. Key performance indicators are used to measure the success of the programs throughout the year. During the reporting period, one lost time injury occurred.

BWXT NEC recognizes that an effective way of maintaining public trust is to maintain environmental excellence. This requires a demonstrated commitment to operating in accordance with the highest environment, health, and safety standards. The facility maintains an effective environmental management system to achieve environmental goals and objectives and keep all environmental impacts well within applicable standards and as low as reasonably achievable. This program demonstrates compliance with relevant provincial and federal legislation. The environmental protection program is also compliant with the following standards:

- Canadian Standards Association (CSA) N288.6-12 (R2017), *Environmental risk assessments at Class I nuclear facilities and uranium mines and mills.*
- CSA N288.5:22, *Effluent and emissions monitoring programs at nuclear facilities.*
- CSA N288.4:19 (R2024), *Environmental monitoring programs at nuclear facilities and uranium mines and mills.*

Air and water emissions are routinely measured to demonstrate compliance with the CNSC's environmental protection requirements and with the principle of keeping radiation exposure As Low As Reasonably Achievable (ALARA). Annual releases were a very small fraction of regulatory limits, and all measurements were below Action Levels. Soil samples were collected around the Peterborough facility and on-site grounds, with all results within applicable guidelines.

An established emergency response plan is in place that describes the actions to be taken to minimize health, safety and environmental hazards to workers and local members of the public which may result from fires, or the release of hazardous materials. The plan intends to reduce the risk of emergencies such as fires and assist emergency staff and personnel in understanding key emergency response issues. The plan assists the facility in protecting employees, the local community, and the environment through sound emergency management practices. The emergency response plan was developed in accordance with CNSC Licence requirements. During the reporting period there was one reportable event related to a suspected gas leak which triggered a response from Peterborough Fire Services, this turned out to be a false alarm.

BWXT NEC has implemented and maintains a Safeguards Program and undertakes all required measures to ensure safeguards implementation in accordance with International Atomic Energy Agency (IAEA) commitments and CNSC regulatory document REGDOC-2.13.1 *Safeguards and Nuclear Material Accountancy.* Movement (inventory changes) of natural and depleted uranium are documented and reported to the CNSC as required. The IAEA and the CNSC jointly conduct annual verifications.

BWXT NEC safely transports dangerous goods, including Class 7 radioactive material shipments as governed by the *Transportation of Dangerous Goods Act* and regulations and the *Packaging and Transport of Nuclear Substances Regulations*. Shipments occur routinely between suppliers and BWXT NEC's Toronto and Peterborough facilities, customers, and waste vendors.

BWXT NEC places great importance on its relationships with local indigenous communities, government, and residents in the communities in which it operates and works to ensure there is open communication and awareness of BWXT NEC's operating activities. The Public Information and Disclosure Program defines the process for providing information about BWXT NEC operations and creating opportunities for two-way engagement and feedback. The Community Liaison Committee (CLC), whose mandate is to provide a forum for a cross-section of neighbours and other community stakeholders to share information and ideas, continued to meet regularly.

This compliance monitoring report demonstrates that BWXT NEC has successfully met the requirements of the *Nuclear Safety and Control Act*, associated regulations and CNSC Class IB Nuclear Fuel Facility Licence conditions.

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2 INTRODUCTION

The purpose of this compliance report is to demonstrate that BWXT NEC has successfully met the requirements of the *Nuclear Safety and Control Act (NCSA)*, associated regulations, and the Class IB Nuclear Fuel Facility Licence FFL-3620.00/2030 issued by the Canadian Nuclear Safety Commission (CNSC) on January 1, 2021, and expiring December 31, 2030. This report is prepared based on the CNSC's regulatory document REGDOC-3.1.2 *Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills*. Appendices containing confidential or proprietary information are submitted to the CNSC separately.

BWXT Nuclear Energy Canada Inc. (BWXT NEC) has been involved with the CANDU® industry from its earliest years. BWXT NEC produces nuclear fuel bundles used by the CANDU® fleet to generate clean electricity that powers homes, business, and the Canadian economy. BWXT NEC operates in three plant locations: Arnprior, Toronto and Peterborough, Ontario. BWXT NEC's Toronto and Peterborough facilities are Class IB nuclear facility operations. Nuclear substance use is regulated federally by the *Nuclear Safety and Control Act* and associated regulations through the CNSC.

The Peterborough facility is located within a mixed residential and industrial area in central Peterborough (Figure 1). The buildings are located on the existing General Electric (GE) plant complex. The licensed facility consists of four buildings: Building 21, 24, 26 and 28, which are leased from GE. Building 21 is a two-floor building and houses the uranium fuel bundle manufacturing operation on the first floor and office personnel on the second floor. Building 24 is a one floor warehouse used to store sealed radioactive material including completed uranium fuel bundles, drums of UO_2 powder, and contaminated equipment as required. Building 26 is principally a conventional fabrication and assembly operation. It also houses manufacturing equipment and a facility for the repair of contaminated equipment. Building 28 houses the main shipping and receiving docks for Building 26 and is directly accessible through Building 26.

Figure 1: BWXT NEC Peterborough

2.1 Processes and Materials

Fuel manufacturing operations involve the loading of fuel pellets into Zircaloy tubes, which are cut to the required length on-site, followed by sealing, and welding of the tubes to produce fuel elements and the assembly of the fuel elements into fuel bundles. The basic assembly process is described in Figure 2 and shows the interconnections with the other BWXT NEC plants.

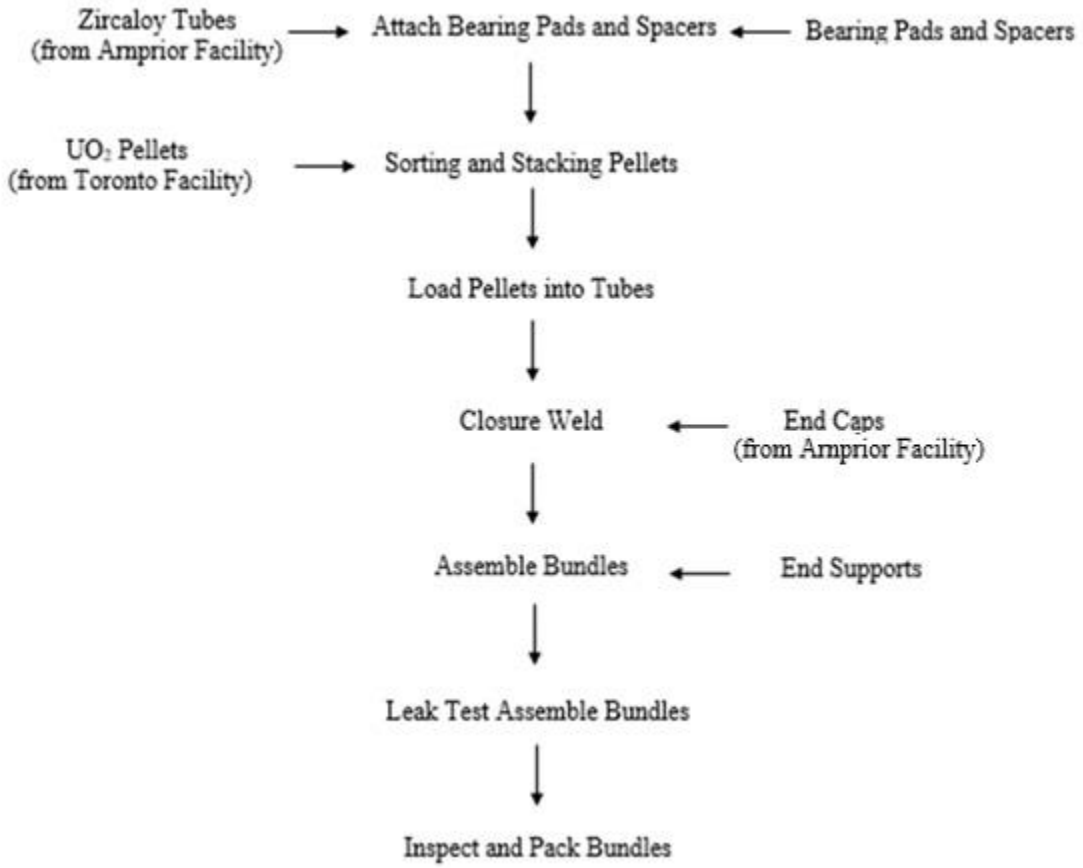

Figure 2: Fuel Bundle Fabrication Process

Although the CNSC Licence authorizes production of fuel pellets in Peterborough, subject to certain conditions, fuel pellet production does not currently take place in Peterborough. Fuel pellet production is performed at BWXT NEC's Toronto facility, in accordance with its Class IB Nuclear Fuel Facility Licence FFL-3621.00/2030.

In addition to fuel fabrication, contaminated equipment from off-site nuclear facilities may be periodically received at the facility for repair and/or modification. One item with fixed contamination was received during the reporting period for testing purposes.

BWXT NEC is federally regulated for health and safety. The federal health and safety legislation is the *Canada Labour Code Part II* and the *Canada Occupational Health and Safety Regulations*. The *Canada Labour Code* is enforced by Employment and Social Development Canada. The purpose of Part II of the *Canada Labour Code* is to prevent accidents and injury to health arising out of,

linked with, or occurring in the course of employment. BWXT NEC is additionally regulated environmentally through municipal sewer use bylaws and provincially by the Ontario Ministry of the Environment, Conservation and Parks (MECP). The BWXT NEC facility is also regulated federally by Transport Canada.

BWXT NEC is committed to the establishment and continuous improvement of a healthy nuclear 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 people and the environment. The Environment, Health and Safety (EHS) Mission Statement defines it as a top business priority to continuously improve our EHS systems to protect fellow employees, the environment, and our communities against known and potential environmental, health and safety hazards. The BWXT NEC management team reviews, prioritizes, and controls workplace hazards and ensures compliance with the pertinent regulatory requirements, applicable codes, and company policies.

The primary radiological hazard from uranium is the inhalation of UO_2 particles. A lesser radiological hazard exists in the form of low-level external gamma and beta radiation exposure to employees. BWXT NEC employs multiple layers of protection to mitigate these hazards, including engineered ventilation and containment systems, strict administrative controls, use of personal protective equipment and a comprehensive radiation protection program. Measurements are performed for various parameters to confirm hazards are mitigated. Measurements for airborne and surface traces of uranium are an indicator of process containment efficiency. Urine samples provided by employees are used to indicate if inhalation may have occurred. Whole body, skin, eye, and extremity dose measurements are conducted to demonstrate compliance with the dose limits specified in the *Radiation Protection Regulations* and the ALARA principle. All measurement results for employees were below regulatory limits and Action Levels.

Air and water emissions are routinely measured to demonstrate regulatory compliance and the ALARA principle. Annual releases were a small fraction of regulatory limits, and all measurements were below Action Levels.

Table 1 defines the acronyms used in this report.

Table 1: Definition of Acronyms

Acronym	Definition
ACR	Annual Compliance Report
ALARA	As Low As Reasonably Achievable
ATS	Action Tracking System
BMS	Business Management System
BWXT NEC	BWXT Nuclear Energy Canada Inc.
CANDU®	CANadian Deuterium Uranium
CCME	Canadian Council of Ministers of the Environment
CLC	Community Liaison Committee
CNSC	Canadian Nuclear Safety Commission
CSA	Canadian Standards Association
CTS	Critical-to-Safety

Acronym	Definition
DIV	Design Information Verification
dpm	Disintegrations per minute – unit of measure for radioactivity 1 dpm = 0.017 disintegrations per second
DRL	Derived Release Limit
EASR	Environmental Activity and Sector Registry
EHS	Environment, Health and Safety
EMS	Environmental Management System
EMO	Emergency Management Organization
ERT	Emergency Response Team
FHA	Fire Hazards Analysis
HWIN	Hazardous Waste Information Network
IAEA	International Atomic Energy Agency
IEMP	Independent Environmental Monitoring Program
LEL	Lower Explosive Limit
LOTO	Lockout Tagout
MECP	Ministry of the Environment, Conservation and Parks
MP	Member of Parliament
MPP	Member of Provincial Parliament
mSv	milliSievert – unit of measure for radiation dose 1 mSv = 0.001 Sv = 1,000 µSv
NDR	National Dose Registry
NEW	Nuclear Energy Worker
NFCC	National Fire Code of Canada
OFI	Opportunity for Improvement
OPG	Ontario Power Generation
PAIR	Partnership Accreditation in Indigenous Relations
PDP	Preliminary Decommissioning Plan
PIDP	Public Information and Disclosure Program
PIT	Physical Inventory Taking
PIV	Physical Inventory Verification
POI	Point of impingement
ppm	Parts per million

Acronym	Definition
SAT	Systematic Approach to Training
SSC	Systems, structures and components
TEDE	Total Effective Dose Equivalent
TLD	Thermoluminescent Dosimeter
UO_2	Uranium Dioxide
µSv	microSievert – unit of measure for radiation dose 1 µSv = 0.001 mSv = 0.000001 Sv
WHMIS	Workplace Hazardous Materials Information System
WSC	Workplace Safety Committee

3 SAFETY AND CONTROL AREAS

3.1 Operating Performance

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

BWXT NEC has successfully implemented and maintained a program for safe operation of the facility that reflects the facility safety analysis. BWXT NEC has established essential documentation (as specified by the Business Management System) including procedures describing the program or system process and work instructions outlining the steps required to complete an individual or set of tasks. 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 of nuclear substances, inventory of all radioactive nuclear substances and the disposition of all nuclear substances acquired for use or processed by BWXT NEC.

Over the reporting period, BWXT NEC continued to operate in a manner that supports the company mission to continuously improve EHS systems to protect fellow employees, the environment, and communities against known and potential environmental, health and safety hazards. Operating performance is monitored with key performance indicators and program goals. Reporting of EHS-related concerns is encouraged through a rewards program. These are assigned and tracked to completion in the Gensuite® software system and is used as a measure of employee engagement. In accordance with EHS program requirements, internal audits and self-assessments are conducted routinely to assess conformance to internal and external requirements. Licensed activity audits and self-assessments are summarized in subsequent sections.

The BWXT NEC management team continued to review, prioritize, and control workplace hazards and ensure compliance with the pertinent regulatory requirements, applicable codes, and company policies. Facility operations continued routinely and safely. Fuel pellets were assembled into CANDU® reactor fuel bundles and were then safely shipped to customers. Plant personnel followed procedures satisfactorily, as reflected in internal and external audits, self-assessments, radiation surveys, contamination monitoring, air sampling measurements and other safety inspections. Details are provided in subsequent sections of this report. There were no Action Level exceedances during the reporting period. Additionally, there were no significant modifications made to the facility in 2025.

The President of BWXT NEC is responsible for all activities within the company. The various functional groups, such as EHS, Quality and Communications report directly or indirectly to the President. Senior management accountability for the effectiveness of the management systems is defined. The Director, EHS & Regulatory Affairs is responsible for the overall EHS program. The company organization structure is shown in Figure 3 below, there have been changes in both personnel and structure during the licensing period.

In 2025, the Director, Fuel Operations was promoted to Vice President, Fuel and Fuel Handling, and the NFAO Peterborough Plant Manager was promoted to Director, Manufacturing Operations. A new Director, EHS & Regulatory Affairs was also appointed.

In 2026, a new NFAO Peterborough Plant Manager was appointed, and the Quality Manager was promoted to Director of Quality. In addition, acting assignments are currently in place for key functions, including EHS and licensing.

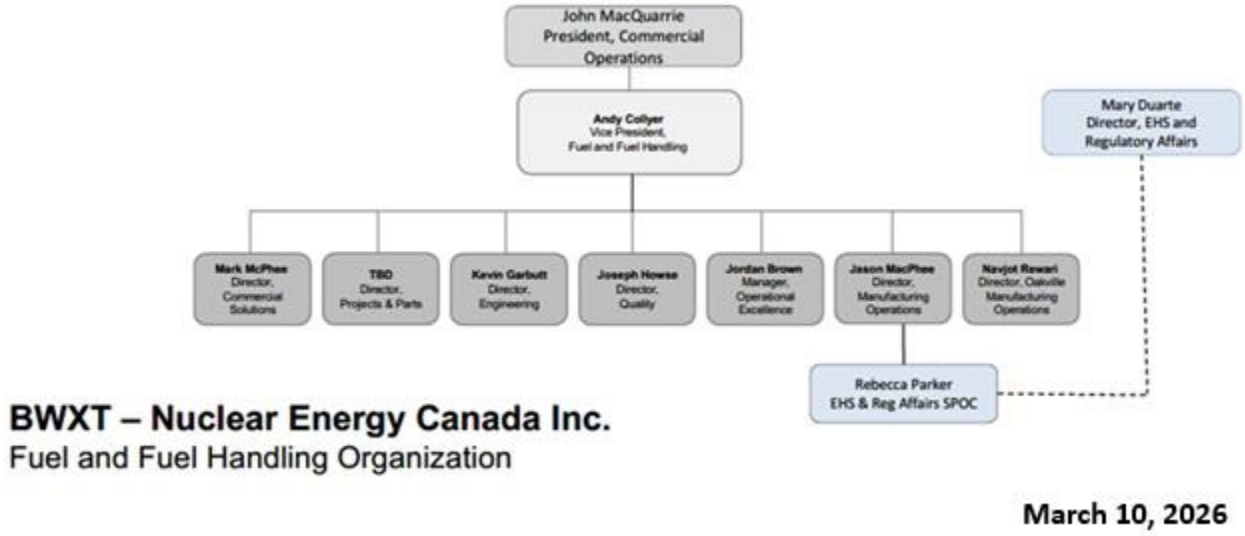

Figure 3: BWXT NEC Organization Structure

BWXT NEC Peterborough maintains four EHS related committees that review activities including proposed changes to ensure safe plant operations. They are:

- Health and Safety Policy Committee – comprised of unionized workers and management to contribute to making the company as safe as possible by promoting health and safety awareness and making recommendations to workers and management regarding policies and procedures for safe working practices.
- Workplace Safety Committee (WSC) – comprised of unionized workers and management to prevent accidents and occupational illness by promoting health and safety awareness, and making recommendations to workers and management regarding safe work practices and monitoring health and safety issues until resolved.

- As Low As Reasonably Achievable (ALARA) Committee – comprised of unionized workers and management to continuously improve the radiation safety program and implement ALARA practices where practical to ensure that radiation doses are as low as reasonably achievable.
- Beryllium Safety Committee – comprised of unionized workers and management to continuously improve the beryllium safety program and reduce potential beryllium hazards to workers.

In 2025 the decision was made to integrate the Ergonomics Committee into the Workplace Safety Committee. This change was implemented to streamline oversight, make more effective use of resources and ensure that ergonomics considerations continue to be addressed as part of overall workplace health and safety.

3.1.1 Possession and Processing

All possession and processing limits, as specified in the CNSC facility Licence were met. Production data is proprietary and is provided separately to the CNSC in Appendix A.

Production shutdowns were scheduled throughout the year for engineering projects, equipment maintenance and continuous improvements. Shutdowns in the reporting period included one week in the first quarter, three weeks in the third quarter, and one week in the fourth quarter.

3.1.2 Regulatory Inspections

Excluding safeguards related inspections, which are described in section 3.13 of this report, there were two regulatory inspections during the reporting period.

1. An inspection was completed in April, focused on the Environmental Protection Program. Three non-compliances, and one recommendation were issued. The actions are of low safety significance and relate primarily to updates to program documentation and verification activities.
2. An inspection was completed in September, focused on Type II Safety Analysis and Fitness for Service. One non-compliance related to records retrievability requirements and two recommendations were issued. The actions are of low safety significance and primarily relate to documentation and alignment of requirements within safety analysis documentation.

When applicable, all corrective and preventative actions related to non-compliances are submitted to the regulator and tracked to closure.

3.2 Management System

The "Management System" Safety and Control Area covers the framework which establishes the processes and programs required to ensure that the organization achieves its safety objectives and continuously monitors its performance against these objectives, as well as fostering a healthy safety culture.

The management system is a set of policies and procedures designed to ensure applicable buildings and facilities, process equipment, and processes used in support of licensed activities are conducted in accordance with the *Nuclear Safety and Control Act* and associated regulations, applicable CNSC requirements, jurisdictional requirements, and best practices. A graded approach is used in the application of the management system program elements, such that the requirements are applied in a manner commensurate with the safety significance of the licensed activity, system, component, or structure.

The management system is comprised of the following core program elements:

1. Organization and Responsibilities
2. Personnel Capability
3. Use of Experience
4. Work Planning Control
5. Work Processes Control
6. Verification
7. Problem Identification and Resolution
8. Corrective Action
9. Change Control
10. Document Control and Records
11. Audits
12. Management Self-Assessment
13. Management Program Review
14. Design
15. Supply Chain
16. Commissioning
17. Operations
18. Decommissioning

The President of BWXT NEC is responsible for all activities within BWXT NEC. Operations and the various functional groups, such as Environment Health and Safety, and Quality Assurance, report directly or indirectly to the President.

Senior Management accountability for the effectiveness of the management systems has also been defined. For example, the Quality Manager has been assigned the responsibility for monitoring and assessing the effectiveness of the business licensed activity management system and is responsible for identifying problems, initiating or recommending solutions, and confirming their implementation and effectiveness. The company senior management organization structure is shown in Figure 3.

The management system is fully implemented and compliant with CSA N286-17, *Management System* Requirements *for Nuclear Facilities*. All management system documentation required by Licence Condition 2.1 is in place. The EHS Policy establishes the direction for the management system. Continuous improvement is achieved through several review processes, including self-assessments, audits, and management reviews. There were no major changes to the management system or responsibilities during the reporting period.

BWXT NEC's corporate policy describes BWXT NEC's commitments to the establishment and continuous improvement of a safety culture. The safety culture refers to the core values and behaviors resulting from a collective commitment by BWXT NEC leaders and individuals to emphasize safety, quality, ethics, and security over competing goals to ensure protection of people and the environment.

BWXT NEC is committed to maintaining a strong safety culture and clearly states the expected safety culture behavior. For example, the promotion of a standard set of human error reduction tools for job-site workers and knowledge workers, which include:

1) Procedure Use and Adherence;
2) Questioning Attitude;
3) Situational Awareness;
4) Self-Checking.

BWXT NEC's commitment to a strong safety culture is measured by tools such as employee concerns, incident investigations, audits and self-assessments, use of experience and corrective action program metrics that measure the effects of safety culture improvements. External agencies such as the CNSC audit BWXT NEC operations against CSA standards, which include safety culture requirements (e.g., CSA N286-17).

In the reporting period, there were no major program changes. Where required, revised documents were submitted to CNSC staff in accordance with the requirements in the Licence Conditions Handbook.

3.2.1 Licensed Activity Related Self-Assessments

The Self-Assessment program governs a proactive process for self-critical, candid, and objective evaluation of performance by a functional area measuring their process performance against internal procedures, expectations, goals established from business plans or external benchmarking standards. The Self-Assessment Program is a management tool used to engage the workforce in early and proactive detection of organizational or systematic weaknesses. It is a functional manager's opportunity to take a structured look at their own function. Self-Assessments help identify low level issues or trends for early resolution before more significant problems occur.

The annual Self-Assessment schedule ensures all program elements are periodically reviewed using a risk-based approach, supporting continuous improvement. During the reporting period, assessments identified only minor, low-consequence updates required to align with current practices and standards, such as revisions to EHS-P-H&S-0.91T to improve alignment with CSA Z94.4-18.

Additionally, several opportunities for improvement were identified, including refining the EHS Audit Plan (EHS-T-001) and Audit Report (EHS-T-002) templates for clarity, incorporating Open Action Tracking metrics to better prioritize resources, and clarifying the application of the hierarchy of controls in EHS-P-RPM-001 under ALARA in accordance with REGDOC 2.7.1 Section 4.4. These improvements demonstrate a proactive approach to maintaining effective program management.

There were no systemic deficiencies identified. The assessed program elements were determined to be effective.

In addition to the Self-Assessment Program, routine compliance reviews are periodically completed against regulatory EHS requirements, such as general environmental, water management, safety management and emergency response.

Table 2: Summary of Self-Assessments

Program Element	Number of Deficiencies and Opportunities for Improvement
Nonconformance & Corrective Action	2
Training	1
Respiratory Protection	3
Radiation Protection	4
Emergency Preparedness/Fire Protection	6
Training	1
Public Information and Disclosure	1
EHS Audits	**1**
Total	**19**

3.2.2 Licensed Activity Internal Audits

Internal auditing is an independent, objective activity designed to add value and continuously improve programs. Periodic assessment of program effectiveness is conducted through systematic internal audits that are planned and carried out on behalf of management to measure performance, the effectiveness of the program element processes and to promote continuous improvement. An audit schedule is prepared annually. Table 3 provides a summary of internal audits conducted in the reporting period (2025).

In 2025, internal audits focused on areas including training programs and operational controls. The Annual Management Review focused on training program outcomes and identified opportunities for enhancement. While the number of Training Program Non-Conformances and OFIs were reported, further detail regarding the nature of these issues and associated corrective and preventative actions was identified as an opportunity to strengthen the review process.

Opportunities for improvement were also identified in contractor management processes, including ensuring contractors are appropriately approved prior to performing work and training documentation is complete and current. During the Workplace, Control & Verification audit, an observation related to lockout/tagout (LOTO) transition practices identified an opportunity to reinforce the proper transfer of responsibility between personnel.

The procurement process is scheduled for review in the next audit cycle.

In addition, a summary review of all non-conformances is conducted as part of the management review to determine if any systemic deficiencies have been identified. Based on the review, continuous improvement opportunities are discussed and documented in meeting minutes with actions tracked to closure.

Table 3: Summary of Internal Audits

Audit Scope	Number of Non-Conformances
Mgt Self-Assessment Program and Annual Mgt Program Review	2
Environment Protection Program (Water)	0
Work Planning, Control and Verification	3
Radiation Protection Program	0
Public Information Program	0
Total	**5**

3.2.3 Management Reviews

Management reviews for EHS program elements are conducted annually before the end of April to review the previous calendar year activities. The EHS management reviews encompass the following items:

- Status and follow-up of actions from previous management reviews;
- Results of applicable external agency audits;
- Open regulatory compliance obligations;
- Results of “Reg Auditor” (Gensuite) compliance evaluations;
- Results of licensed activity management system internal and external audits (where applicable);
- Results of licensed activity management system management self-assessments;
- Trends in non-conformances (Gensuite Action Tracking System items) for closure metrics;
- EHS related quality assurance program actions;
- Trends in Incident and Measurement (Gensuite) items for root cause;
- Status of EHS training activities;
- Procurement process;
- Extent to which Environmental, Health and Safety and ALARA objectives and targets have been met;
- Radiation dose trends;
- Effluent and environmental monitoring trends;
- Communications and changes in the needs and expectations of interested parties, including complaints;
- Changing external and internal issues, including compliance obligations;
- Changes in risks and opportunities;
- Opportunities for continuous improvement;
- Evaluation of the effectiveness and continuing suitability of the EHS Mission Statement and the Environment, Health and Safety Program, which includes the EHS management system and hazard prevention program.

The above inputs are reviewed to ensure continuing suitability, adequacy, and effectiveness of the management system. The criteria for these are:

- **Suitable**: Does the system satisfy the requirements and represent the best way of doing things for our business?
- **Adequate:** Is the system fit for its current purpose?
- **Effective:** Does the system enable the right things to be done? Is it driving continuous improvement?

Formal meeting minutes are prepared. The previous management review of 2023 resulted in five actions that were formally issued for follow-up by the applicable functional lead(s) and were tracked to closure in the Action Tracking System (ATS). The review of 2024 held in April 2025 resulted in seven Opportunities for Improvement, as follows:

1. Revise EHS-P-006 to modify the scope to include Arnprior,
2. Include in the self-assessment on Self-Assessments a review of the schedules to ensure all topics covered in the schedule are appropriate and cover all aspects of the business,
3. Add the OFIs for Internal Audits to next years EHS Management Review presentation.
4. Ensure everyone on the shop floor (not just operators) are trained on pellet scrapping, and to determine a frequency on which retraining is provided,
5. Ensure all confined spaces are to be reviewed by the WSC and be marked as either ‘permit required’ or ‘no-permit required’,
6. Review the OPEX data from the TDS 1 project for the TDS 2 project,
7. Update the EHS Mission Statement on line 8 to include phrasing about the life cycle and sustainability of product from an environmental perspective.

Overall, the implemented management system for the licensed activity program was considered suitable, adequate, and effectively implemented. Continuous improvement remains a priority.

3.3 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 that BWXT NEC staff members 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.

The training program is outlined in the licensed activity management system manual, and business-wide training procedures. 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 on-the-job training, radiation protection and safety risk assessment training. Workers only perform functions for which they are qualified. Compliance with regulatory training completion is a key performance indicator that is tracked throughout the year. Key EHS course completion details are provided in Table 4. Note: N/A indicates that zero employees required the course during the reporting period.

Table 4: Key Training Course Completion Summary

Course Name	% Complete
911 Transition Training	N/A
Aerial Lift Practical	100%
Aerial Lifts	100%
Authorized Person Security	N/A
Back Safety and Injury Prevention 2.0 – Canada	100%
Compressed Gas Safety	100%
Confined Spaces 2.0 – Canada	100%
Electrical Hazards: Shock, Electrocution, Arc Flash & Arc Blast	100%
Electrical Safety 2.0 – Canada	100%
Emergency and Disaster Preparedness – Canada	100%
Emergency Response Awareness	100%
Ergonomics in the Workplace 2.0 – Canada	100%
Fall Protection Advanced	100%
First Aid (Standard)	100%
Hearing Conservation 2.0 – Canada	100%
Indoor Hoisting and Rigging – Canada	*96%
Laser Safety – Canada	*99%
Lockout Tagout (LOTO) Procedure	100%
Lockout Tagout (LOTO) Try-Out Demonstration	*96%
Lockout/Tagout 2.0 – Canada	*99%
Manufacturing Area Hazards Awareness (Includes Radiation, Beryllium, Asbestos, and General Health & Safety)	*99%
Overhead Cranes Level 1 Practical	N/A
Overhead Cranes Level 2 Services & Practical	100%
Portable Fire Extinguishers – Canada	100%
Powered Industrial Truck Safety with Propane Handling	100%
Powered Walkie Stacker Safety	100%
PPE: Personal Protective Equipment 2.0 – Canada	100%
Radiation Instrumentation	100%

Course Name	% Complete
Respirator Selection Use and Care	N/A
Respiratory Protection 2.0 – Canada	100%
Security Awareness – Peterborough	100%
Slips, Trips, and Falls 2.0 – Canada	100%
Transportation of Dangerous Goods	100%
Uranium Transportation Emergency Response Assistance	100%
Workplace Harassment and Violence Overview	100%
Workplace Hazardous Materials Information System (WHMIS)	100%

** The courses that were less than 100% complete by December 31, 2025, were completed by January 31, 2026.*

In addition to the above training, members of the Emergency Response Team (ERT) and the Repair and Clean teams completed spill response training in 2025, which included both classroom and practical components.

The Peterborough facility is staffed with a sufficient number of qualified workers as well as the minimum number of responsible people to carry on the licensed activities safely and in accordance with the *Nuclear Safety and Control Act* and associated regulations. EHS and other staff are available after business hours as needed through cell phones and paging devices.

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 preventative measures and strategies in reducing the effects of such hazards. The safety analyses utilize a combination of What-if Analysis, Hazards and Operability and Quantitative Risk Analysis and documents a systematic evaluation of hazards associated with the licensed facility.

Modifications to the facility are made in accordance with the business-wide Change Control program, which requires review of EHS parameters for new or modified facilities, processes, and new or relocated machinery, apparatus and equipment. 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.). Third-party reviews or regulatory approvals are conducted as required. In this way, impacts on the safety analysis are identified and the safety analysis is validated and updated, where necessary.

In 2024, a five-year update of the safety analysis report was made. The safety analysis report concludes that the engineered and administrative controls provide protection over a broad range of operating conditions that both restricts the likelihood of events and adequately protects the public and environment. The safety analysis report is scheduled for a routine five-year update in 2029.

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 are assessed through the Change Control program. Any changes to the design basis are identified and assessed by key stakeholders through this program, including third-party reviews as required. Adequate mitigations are applied including modification of the proposed change, up to rejection of the proposed change.

During the reporting period, there were no modifications to the physical facility that altered the design basis.

3.6 Fitness for Service

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

A Critical to Safety (CTS) program is in place. CTS items are those hardware items that directly ensure the safety of workers, protection of the environment, or regulatory compliance in the following three categories:

- Equipment and infrastructure identified as Safeguard Measures in the Facility Safety Analysis Reports;
- Respiratory personal protective equipment; and
- Instrumentation generating data to demonstrate Regulatory Compliance.

BWXT NEC documentation describes the CTS program for the production of nuclear fuel, including CTS items common to both business units, Fuel and Fuel Handling. Equipment identified on the CTS list is governed by a number of assurance procedures.

The CTS program elements include the following:

- Process to identify CTS equipment;
- CTS inventory list revision control;
- Procurement controls governing ordering and incoming verification to confirm CTS equipment received matches the CTS equipment list requirements;
- Requirements in the established change management program to adequately capture new additions and ensure sufficient detailed review of changes to existing CTS equipment; and
- The factors determining the preventative maintenance schedule of CTS Equipment.

The facility is using an asset management and preventative maintenance software system. Maintenance Connection®, a web-based maintenance management software for work order and asset management. Maintenance Connection assists BWXT NEC in efficiently managing preventative maintenance tasks as well as to control and identify maintenance on CTS and Critical-to-Quality assets and components. Preventative maintenance tasks on CTS equipment are designated in this system as described in the business wide *Enterprise Asset Management Program Procedure*.

Certain CTS tasks have associated immediate independent post-maintenance verification or testing. For example, independent verification is in place on the beryllium ventilation systems during filter changes.

99.7% of all CTS tasks issued in the reporting period are closed. In the reporting period, 89% of CTS tasks issued were completed within 14 days of the target completion date.

Preventative maintenance is considered during the assessment of changes as part of the business-wide Change Control program. Additionally, in the event of a near miss, incident, injury, inspection or suggestion, the preventative maintenance program for related equipment is reviewed as applicable. As a result, during the reporting period, the following improvements were implemented:

- Installation of a false floor in the R2 area robotics cell. Phase 1 of the false floor was installed to eliminate uneven walking surfaces and protruding metal features that presented a potential trip hazard. The installation created a uniform walking surface and improved housekeeping and worker safety within the area. Phase 2 began in 2026.
- Replacement of aging hoists in the final inspection area. The new hoists improve equipment reliability and reduce the risk of equipment failure, supporting continued safe and efficient operations.
- Addition of a locking mechanism to the support legs of the bundle washer door. This mechanism ensures that the legs are in the appropriate position when the weight of the bundles is placed on the door reducing the risk of structural failure.
- The steel drums that are used to transport the waste sulfuric acid from the Beryllium process were replaced with plastic drums reducing the risk of a perforation of the drum wall and subsequent leaking of the contents.
- Shielding was added to the suspect bundle collection area in Final Inspection to reduce the amount of radiation received by surrounding personnel.
- 2 PMs were updated in response to ATS/Concern Reports.
- 6 safety critical PMs were updated as part of continuing improvement activities.

Managing aging means ensuring the availability of required safety functions throughout the service life of the plant, with account taken for changes that occur with time and use. Aging management applies to SSCs that can, directly or indirectly, have an adverse effect on the safe operation of the plant. The asset management program accounts for aging through the CTS program inspection, testing and maintenance tasks. These processes provide warning signs and initiate corrective and preventative maintenance activities. Items identified for replacement are assessed through the Change Control program.

The preventative maintenance program is periodically assessed through self-assessments and internal audits, discussed in section 3.2 of this report. Key performance indicators are in place and are routinely reviewed. The program is adequate and effective and is continually improved.

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 NEC 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 UO_2. This program ensures that surface/airborne contamination and radiation doses

to employees and the public are monitored and controlled. The Director, EHS & Regulatory Affairs, has oversight of BWXT NEC's Radiation Protection Program.

Internal radiation hazards exist in the form of loose uranium which may enter the body by inhalation, ingestion, or absorption. As a result, air monitoring is conducted at various workstations within the facility as appropriate. Workstation air monitoring is a key performance indicator that speaks to effective administrative and engineered controls. A respiratory protection program is in place in accordance with CSA Z94.4-18, *Selection, use, and care of respirators.* Additionally, surface contamination measurements (swipes) are conducted in manufacturing areas to monitor and reduce the amount of loose radioactive material available for potential internal exposure to employees. The monitoring processes generate valuable data that is regularly trended and reviewed by the ALARA Committee, demonstrating a strong commitment to data-driven decision-making and continuous improvement.

Additionally, urine samples are regularly provided by employees to indicate if inhalation may have occurred. Sampling frequency is once per three months, based on established criteria such as job function and worker location within the facility. Criteria which determine the frequency of urine sampling for an employee are documented in the Radiation Protection Program.

A second radiological hazard exists in the form of low-level external gamma and beta radiation doses to employees. Routine gamma surveys are conducted, and Nuclear Energy Workers (NEWs) are issued Thermoluminescent Dosimeters (TLDs) to measure whole body, skin, eye, and extremity dose to ensure compliance with the regulatory radiation dose limits and the ALARA principle. Dose results are reviewed by EHS staff on receipt from the licensed dosimetry service provider. In addition, the ALARA Committee reviews trending data from radiation monitoring results through routinely scheduled meetings and provides recommendations to improve ALARA implementation.

As external radiation hazards from the storage and use of radioactive materials may result in radiation doses to workers, routine gamma radiation surveys are conducted within the facility using real-time portable handheld radiation detectors. Measured dose rates are compared to established dose rate targets for a given area based on area classification and occupancy. When necessary, items are moved to alternative storage locations and/or shielded. Areas that appear routinely higher than target dose rates are investigated for permanent improvements, such as shielding or reconfiguration.

A component of the Radiation Protection Program is area classification. Areas of the facility are classified into four different categories for the purpose of controlling the spread of radioactive contamination and ensuring appropriate engineered and administrative controls are in place. These classifications are defined in the *Radiation Protection Manual* as follows:

- Unclassified Area – these areas do not involve nuclear substances and are considered public domain. Incidental contamination does not exceed the unclassified area Internal Control Levels.
- Active Area – these areas are designed for handling materials with loose contamination that is potentially above unclassified area Internal Control Levels. External radiation hazards are not of significant concern.
- R1 Area – these areas are designed for operations where only external radiation is of concern, and loose contamination is below R1 Area Internal Control Levels.
- R2 Area – these areas are designed for operations involving exposed non-dispersible nuclear substances, where external radiation is of concern and loose contamination may be above R1 Internal Control Levels.

BWXT NEC has established CNSC accepted Action Levels for various radiological and environmental parameters. An Action Level is defined in the *Radiation Protection Regulations* as "a specific dose of radiation or other parameter that, if reached, may indicate a loss of control of part of a licensee's Radiation Protection Program, and triggers a requirement for specific action to be taken."

Action Levels are established in accordance with the CNSC regulatory document G-228, *Developing and Using Action Levels*, which are accepted by the CNSC and specified in the Licence Conditions Handbook (refer to Table 5). Although Action Levels are set below regulatory limits, exceeding an Action Level is considered a CNSC reportable event in which BWXT NEC must notify the Commission within 24 hours of becoming aware that an Action Level has been exceeded. Accordingly, BWXT NEC has established Internal Control Levels for various radiological and environmental parameters that are set even lower than Action Levels to act as an early warning system. An Internal Control Level exceedance results in internal investigation and corrective and preventative action. During the reporting period, all measurements were below Action Levels and regulatory limits. One Internal Control Level exceedance for whole body dose occurred during Q1 and was investigated in accordance with program requirements.

Table 5: Summary of Action Levels for the Radiation Protection Program

Nuclear Energy Worker	**Period**	**Action Level (mSv)**	
Effective dose	Quarter of a year	4.0	
Effective dose	1 year	12.0	
Effective dose	5 years	60.0	
Skin dose	1 year	100	
Extremity dose	1 year	200	
Pregnant NEW	Balance of the pregnancy	3.5	
Parameter		**Action Level**	
Urinalysis		10 µg/L for any period	
Nuclear Substance and Form	**Action Level**		
Uranium in Airborne Contamination	Unclassified Area	R1 Area	R2 Area
	12 dpm/m^3	12 dpm/m^3	36 dpm/m^3

BWXT NEC has a well-established integrated management system for environmental, health and safety program excellence. The Radiation Protection Program is effectively implemented. BWXT NEC has an established *EHS Mission Statement* that is reviewed and signed annually by the President of BWXT NEC. The *EHS Mission Statement* includes a commitment to ALARA and continuous improvement. Elements of the Radiation Protection Program such as dose monitoring, contamination monitoring, and radiation field surveys, etc. are conducted by qualified workers and reviewed internally by EHS staff and Committees on a regular basis. Details of the reviews are recorded in meeting minutes.

An internal audit and self-assessment of the Radiation Protection Program, with a focus on elements of Radiation Protection Program effectiveness and compliance, are conducted routinely. Non-conformances are addressed and tracked to completion in accordance with program requirements.

In accordance with the *Radiation Protection Regulations* and CNSC REGDOC-2.7.1, *Radiation Protection*, BWXT NEC has implemented a Radiation Protection Program. This document establishes the Radiation Protection Program in place and identifies corresponding procedures to ensure that radiation exposures and doses are maintained ALARA.

Key components of the Radiation Protection Program include:

- Compliance with all relevant regulatory requirements;
- The setting of ALARA goals and objectives;
- Hazard recognition, risk assessment and change control processes;
- A comprehensive worker training program; and
- Documented safety concerns, near misses and incidents with appropriate root-cause analysis, preventative and corrective actions.

The Radiation Protection Program includes all worker radiation safety elements that demonstrate compliance with relevant regulations, codes, and standards including:

- EHS policy commitment to ALARA,
- Area classifications and requirements,
- Material handling,
- Non-routine or high-risk work controls,
- Internal and external radiation hazard assessments, and
- Internal and external radiation monitoring and recording.

Continuous improvement is achieved through several review processes, including site inspections, reported safety concerns, near miss and incident investigations, self-assessments, and internal and external audits. There were no major changes to the Radiation Protection Program during the reporting period. Continuous improvements were instituted as follows:

- The *Beryllium and Uranium Air Emissions Data Entry* work instruction was created to document instructions for the analyses of air effluent.
- The *Internal Calibration of Rotameter* work instruction was created to document the details and instructions for performing calibration of the rotameter used for determining station and exhaust flows.

The Radiation Protection Program remains well established and effective. Trends in whole-body dose and equivalent doses to the skin, extremities, and lens of the eye have remained stable over the past five years. The company continues to demonstrate its commitment to ALARA, with dose reduction remaining a priority. Ongoing efforts include improvements to shielding, material handling and movement, increased ALARA awareness (e.g., use of leaded blankets on product), and continued compliance with TLD wear and storage requirements. Program goals are monitored through the site's ALARA Committees, as summarized in section 3.7.1.

3.7.1 ALARA Committee Performance

The ALARA Committee works to review and continuously improve elements of the Radiation Safety Program and implement ALARA practices where practical in order to ensure that radiation dose levels are as low as reasonably achievable. Committee members consist of both unionized and management employees. The ALARA Committee targets quarterly meetings; in 2025 the committee

met six times during the reporting period (four quarterly meetings, one training session, one internal investigation). Dose results, radiation protection related events, audits, and employee concerns were reviewed and discussed. Actions are assigned and tracked as part of the meeting minutes. Committee activities are communicated to all workers via email distribution and employee notice board postings.

ALARA Committee goals and results for the reporting period are provided in Table 6. Goals that are not achieved are reviewed by the ALARA Committee to discuss probable causes. The feasibility of achievement is discussed, and implementation plans revised as needed. As radiation doses continue to be well below the regulatory dose limits, dose reductions become increasingly challenging.

All four of the Committee goals were achieved this year. TLD audits are conducted periodically to verify that workers are wearing and storing their dosimeters in accordance with program requirements to ensure accurate dose measurement. Overall, the site achieved 99.9% compliance with TLD requirements.

At each quarterly meeting, the Committee reviewed a topic related to regulatory requirements and/or the internal radiation protection program. Committee members also participated in an additional training session to further their understanding of topics related to ALARA and radiation protection.

The Committee also collaborated with the production team to improve the layout and housekeeping for the QA bench located in the R2 area.

The results of swipes, air sampling, urinalysis, gamma surveys and radiation dose monitoring were reviewed with the Committee. No areas of concern were noted. Monitoring continues in accordance with the Radiation Safety Program requirements.

Table 6: ALARA Committee Goals and Results

2025 ALARA Committee Goals	Actual	Result
>99% compliance in TLD audits	99.9%	Achieved
Review a section of the regulations and/or internal program at each quarterly meeting	4/4	Achieved
Complete a session of ALARA training for the committee in addition to quarterly meetings	1/1	Achieved
Improve the layout and housekeeping for the QA bench in the R2 area	Complete	Achieved

2026 ALARA Committee goals are established as follows:

1. Develop and implement an ALARA workstation review program, including creation of a standardized audit checklist for Committee members to periodically assess workstations, work practices, and employee behaviours for adherence to ALARA principles.
2. Review and improve laundry cart handling practices, including evaluating controls for the cart transported between the Peterborough facility and the Toronto facility to ensure appropriate contamination control.
3. Identify and address opportunities to reduce radiation dose through improved housekeeping and material management, including reviewing areas where radioactive product or components

may be stored and relocating items or implementing shielding where appropriate to minimize worker exposure.

4. Implement a full-time extremity dosimetry program for workers handling radioactive material, replacing the previous quarterly sampling approach, and conduct periodic audits of the program to verify compliance and effectiveness.

3.7.2 Radiation Protection Training Program and Effectiveness

Radiation protection training programs are compliant with the Systematic Approach to Training (SAT) methodology. An internal or external specialist in radiation protection periodically provides classroom training to new and continuing NEWs or those working in areas with radioactive materials. Online training is also available to employees with computer access. Testing is performed on completion of the training to demonstrate employee understanding. Radiation protection training is rolled into the site-wide Manufacturing Area Hazards Awareness course. Course content includes general shop floor rules, radiation fundamentals, sources of ionizing radiation, health effects, emergency response and other safety-related content. Training completion is monitored using a learning management software system, which tracks and triggers retraining as required. Course completion details are provided in section 3.3. Training effectiveness is monitored through radiation dose results, internal inspections, self-assessments, and audits as well as incident investigations.

3.7.3 Radiation Device and Instrumentation Performance

Radiation detection instrument error can occur due to a variety of factors: drift, environment, electrical supply, addition of components to the output loop, process changes, etc. The facility maintains a system for managing radiation detection instrument calibrations. Calibration is conducted to ensure accurate indication during field use. Calibrations are performed under environmentally controlled conditions suitable for the inspections, measurements, and tests being performed, as determined by the equipment manufacturer. Calibration intervals are established, so that calibration occurs before any anticipated significant changes occur in measurement capability. Radiation detection equipment calibrations are conducted within 12 months of the previous calibration as required by regulation.

All active radiation devices and instruments were maintained in a state of safe operation. Where calibration is expired or where detectors fail calibration, they are removed from service until they are repaired and meet radiation calibration expectations.

There were no changes to the calibration program during the reporting period.

3.7.4 Contamination Control Data

When radioactive material is handled in a non-sealed container, there is the potential for it to be spread onto other objects. This is known as radioactive contamination. Radioactive contamination refers to small amounts of nuclear substances on surfaces or within the air, where its presence is unintended or undesirable.

Surface contamination measurements (swipes) are conducted in manufacturing areas of the facility. Contamination by itself is not necessarily an indicator of exposure potential but can be used as an indicator of housekeeping conditions; however, significant amounts of loose surface contamination have the potential to become airborne. If this occurs, the air monitoring results will reflect increased airborne concentration, and appropriate corrective action is then taken. Internal Control Levels are applied to each area classification. In the event a swipe measurement exceeds an Internal Control Level; the area is cleaned and re-swiped to verify cleanliness. Trends are monitored. There were no significant personnel contamination events during the reporting period.

Routine surface contamination measurement results are summarized in Table 7. Surface contamination remains low. Surface contamination results are reviewed by EHS staff and discussed, if necessary, at ALARA Committee meetings. Overall, 99.1% of routine swipes were within Internal Control Levels, indicative of effective contamination control measures and cleaning schedules.

Eight of the exceedances for 2025 occurred in the R2 Area, all at the Sort and Stack location. In each case, the area was cleaned and re-swiped to confirm that contamination had been removed and had not spread. In comparison, eighteen exceedances occurred in the R2 Area in 2024; the reduction observed in 2025 is attributed to increased cleaning frequencies implemented in the area. The R2 Area is subject to rigorous cleaning but is expected to have the potential for surface contamination due to the nature of the work performed.

Three of the exceedances occurred in the Active area, all within the R2 waste area on the floor. This location is adjacent to the R2 Area and serves as a transition area for waste barrels.

Two exceedances occurred in the Unclassified Area. One involved the laundry cart; the ALARA Committees for both the Peterborough and Toronto facilities have identified improvements to this process as a goal to eliminate potential contamination issues. The second exceedance occurred on an end plug bag, which was cleaned and re-swiped prior to removal from the R2 Area.

Table 7: Summary of Surface Contamination

Surface Contamination					
Classification and Area Description	**Internal Control Level**	**2024**		**2025**	
		Number of Samples	**Number Samples Exceeding Internal Control Level (%)**	**Number of Samples**	**Number Samples Exceeding Internal Control Level (%)**
R2 – Pellet Loading, Element Welding and Pellet Storage	2,200 dpm /100 cm^2	661	18 (2.7%)	640	8 (1.3%)
R1 – Bundle Assembly, Inspection, Receiving, Building 24	220 dpm /100 cm^2	117	0 (0%)	135	0 (0%)
Active – Met Lab, Waste Room	220 dpm /100 cm^2	84	0 (0%)	93	3 (3.2%)
Unclassified – Items, Main Hallway	220 dpm /100 cm^2	518	2 (0.4%)	533	2 (0.4%)

3.7.5 Air Monitoring

As part of a well-established and implemented industrial hygiene program, breathing air is sampled for measurement of uranium content. Workstation air monitoring is a key performance indicator that speaks to effective administrative and engineered controls. A respiratory protection program is in place. Non-routine work functions, such as machine maintenance, modifications, etc. are controlled

by EHS Work Permits. These processes specify protective measures, including those to reduce exposure to airborne UO_2. Depending on conditions, this may include air monitoring and/or respirator use.

Each process workstation where open UO_2 pellets are handled are periodically monitored during routine operations for airborne UO_2. Filter papers are analysed in-house and verified by an independent external laboratory using delayed neutron activation analysis. Workstation air sampling results are summarized in Table 8. Both the maximum and the average workstation air monitoring results continue to remain well below Internal Control Levels, with the average concentration increasing since the introduction of the Sort and Stack operation.

Table 8: Workstation Air Monitoring Summary

Workstation Air Monitoring	2021	2022	2023	2024	2025
Number of Different Workstations Sampled	6	6	5	3	6
Total Number of Samples Collected	81	46	64	46	48
Total Number of Samples Exceeding Internal Control Level (facility and area specific)	0	0	0	0	0
Total Number of Samples Exceeding Action Level (facility and area specific)	0	0	0	0	0
Average Concentration (dpm/m^3)	0.09	0.19	0.25	0.43	0.52
Maximum Value Recorded (dpm/m^3)	0.67	0.85	8.52	2.44	3.53

3.7.6 Facility Radiological Conditions

Radiation fields from use and storage of radioactive materials may result in external radiation doses to workers. To ensure that radiation dose rates are ALARA, routine gamma radiation surveys are conducted periodically using calibrated portable handheld radiation detectors. Measured dose rates are compared to targets for areas based on area classification and occupancy. When necessary, items are moved to alternative storage locations and/or temporarily shielded. Areas that appear routinely higher than target dose rates may be investigated for improvements, such as permanent shielding or reconfiguration. Routine dose rate measurements are summarized in Table 9. Dose rates remain low and stable. The gamma surveys focus on radioactive material handling and storage areas and adjacent occupied locations. Variability due to the timing of the surveys is a factor in the results, as production levels and movement of materials vary over the course of a day.

Table 9: Routine Dose Rate Survey Summary

Gamma Dose Rates	2021	2022	2023	2024	2025
Total Number of Locations Surveyed	361	380	417	357	590
Average Dose Rate (µSv/h) on Shop Floor	3.1	2.7	3.7	3.6	2.4
Average Dose Rate (µSv/h) in Storage Areas	5.5	4.6	4.9	5.7	3.7

3.7.7 Urinalysis Results

The presence of uranium in the urine is an indication of recent inhalation of UO_2 dust or the systemic clearance of an established thorax burden. At BWXT NEC, urinalysis is used as a screening tool to

initiate further review of internal dose control measures and practices but is not used to estimate internal dose.

All employees working where exposed UO_2 material is processed (R2 classified area) for a period greater than 30 hours per quarter, or working as a roving inspector during the quarter, submit urine samples for uranyl ion analysis. Samples are analyzed by an external laboratory for uranium content using Inductively Coupled Plasma – Mass Spectrometry (ICP-MS) with a minimum detectable concentration of 0.1 µg uranium per Litre (U/L). Results are compared to Internal Control Levels and Action Levels and entered and retained in an electronic database. Urinalysis results are summarized in Table 10.

Of all urinalysis samples processed between 2005 and 2025, <1% of samples (20/2478) have measured above the minimum detectable concentration of 0.1 µg U/L. These occurrences were well below the Internal Control Level of 5 µg U/L. This confirms that the inhalation hazards at the facility are negligible and that current engineered and administrative controls, where applicable, are effective.

Table 10: Urinalysis Results Summary

Urinalysis	2021	2022	2023	2024	2025
Number of urine samples analyzed	103	105	110	101	95
Number of samples above Internal Control Level (5 µg U/L)	0	0	0	0	0
Number of samples above Action Level (10 µg U/L)	0	0	0	0	0
Maximum result (µg U/L)	0.1	0.2	0.1	0.9	0.6

3.7.8 Radiation Doses

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 within Action Levels and regulatory limits. Action Levels are site specific and are accepted by the CNSC through the Licence Conditions Handbook. Regulatory limits are specified in the Radiation Protection Regulations. Regulatory limits are listed in Table 11 and Table 12. There was one Internal Control Limit exceedance for Effective Dose which occurred in Q1; the event was documented and investigated, and corrective actions were assigned and implemented.

Table 11: Regulatory Effective Dose Limits

Effective Dose Limits		
Person	**Period**	**Effective Dose (mSv)**
NEW, including a pregnant NEW who has yet to disclose pregnancy status	(a) One-year dosimetry period (b) Five-year dosimetry period	50 100
Pregnant NEW	Balance of the pregnancy	4
A person who is not a NEW (i.e., a member of the public)	One calendar year	1

Table 12: Regulatory Equivalent Dose Limits

Equivalent Dose Limits			
Organ or Tissue	**Person**	**Period**	**Equivalent Dose (mSv)**
Lens of an eye	(a) NEW (b) Any other person	One-year dosimetry period One calendar year	50 15
Skin	(a) NEW (b) Any other person	One-year dosimetry period One calendar year	500 50
Hands and feet	(a) NEW (b) Any other person	One-year dosimetry period One calendar year	500 50

All workers are classified as either NEWs or non-NEWs. All NEWs are deemed to have a reasonable probability of receiving a dose of radiation that is greater than the prescribed limit for a member of the public (1 mSv/year) in the course of the person's work with nuclear substances or at our nuclear facility. All Fuel Manufacturing NEWs are assigned personal passive dosimeters known as TLDs (Thermoluminescent Dosimeter). These passive dosimeters measure the whole body and skin doses received in each monitoring period and are analyzed by the licensed dosimetry provider to calculate an eye lens dose.

Employees whose duties involve handling radioactive material participate in the extremity dosimetry program and wear extremity TLD rings for a one-week monitoring period each quarter. The monitoring results along with recorded hours of contact with radioactive material, are used to estimate the extremity dose for that quarter.

During a CNSC inspection in 2023, a non-compliance related to the extremity dosimetry program was identified. A study was subsequently conducted to evaluate potential extremity doses for workers handling radioactive material. Based on the study results and CNSC direction, BWXT NEC Peterborough will implement full-time extremity TLD monitoring for employees included in the extremity dosimetry program beginning in Q2 2026.

TLDs are exchanged quarterly and analyzed by a CNSC-licensed external dosimetry service provider. The dosimetry provider reports measured doses to BWXT NEC Peterborough and to Health Canada National Dose Registry (NDR). Upon receipt, knowledgeable staff review the monitoring results and compare them against Internal Control Levels, Action Levels, and regulatory dose limits.

The annual dose assignment for employees consists of external dosimetry inputs, for which dose summaries are tracked for quarterly, year-to-date, five-year and lifetime. All NEWs who are monitored for radiation exposure receive an annual dose letter identifying their annual dose.

Dosimetry results are summarized in the following sub-sections. Employees are divided into workgroups based on job function for dosimetry analysis and trending. Operators are employees who directly manufacture product. Technicians are employees who support the licensed activities, (Fuel Manufacturing or Fuel Handling), e.g., electrical, mechanical, quality control, laboratory, etc. Staff includes management and professional employees who support the operation and includes the Customer Site Representatives.

3.7.9 Total Effective Dose Equivalent

Total Effective Dose Equivalent (TEDE) includes TLD monitored external dose. As a result of operations involving sintered ceramic pellets, the facility does not have any measurable internal dose; therefore, the TEDE is the measured TLD external whole-body dose. Table 13 provides a summary of TEDE dosimetry measurements with monitored workers grouped in various ranges of exposure. Approximately 63% of TEDE are less than 1 mSv.

Table 13: Total Effective Dose Equivalent Distribution

Year	Total # Individuals	Total # of Individuals in Dose Range (mSv)							
		0 - 1	1 - 5	5 - 10	10 - 20	20 - 50	50 - 100	100 - 200	200 - 500
2025	78	49	22	7	0	0	0	0	0
2024	67	43	17	7	0	0	0	0	0
2023	79	53	21	5	0	0	0	0	0
2022	69	47	17	5	0	0	0	0	0
2021	73	50	16	7	0	0	0	0	0

TEDE by workgroup over the last 5 years is listed in Table 14. The average dose results include zero measurements.

Table 14: Total Effective Dose Equivalent Summary

	Year	All Workgroups	Operators	Technicians	Staff
Maximum (mSv)	2025	8.38	8.38	1.87	1.15
	2024	8.57	8.57	1.53	0.86
	2023	6.78	6.78	1.72	0.79
	2022	7.65	7.65	1.45	0.62
	2021	9.83	9.83	1.42	0.78
Average (mSv/person)	2025	1.59	2.59	0.67	0.22
	2024	1.59	2.53	0.67	0.26
	2023	1.43	2.28	0.65	0.25
	2022	1.29	2.18	0.51	0.15
	2021	1.38	2.51	0.48	0.22

The trends for maximum and average TEDE for all monitored individuals is shown in Figure 4. The total collective dose for 2025 was 123.6 mSv. The average TEDE has remained relatively consistent over the past five years, indicating stable radiological conditions during this period.

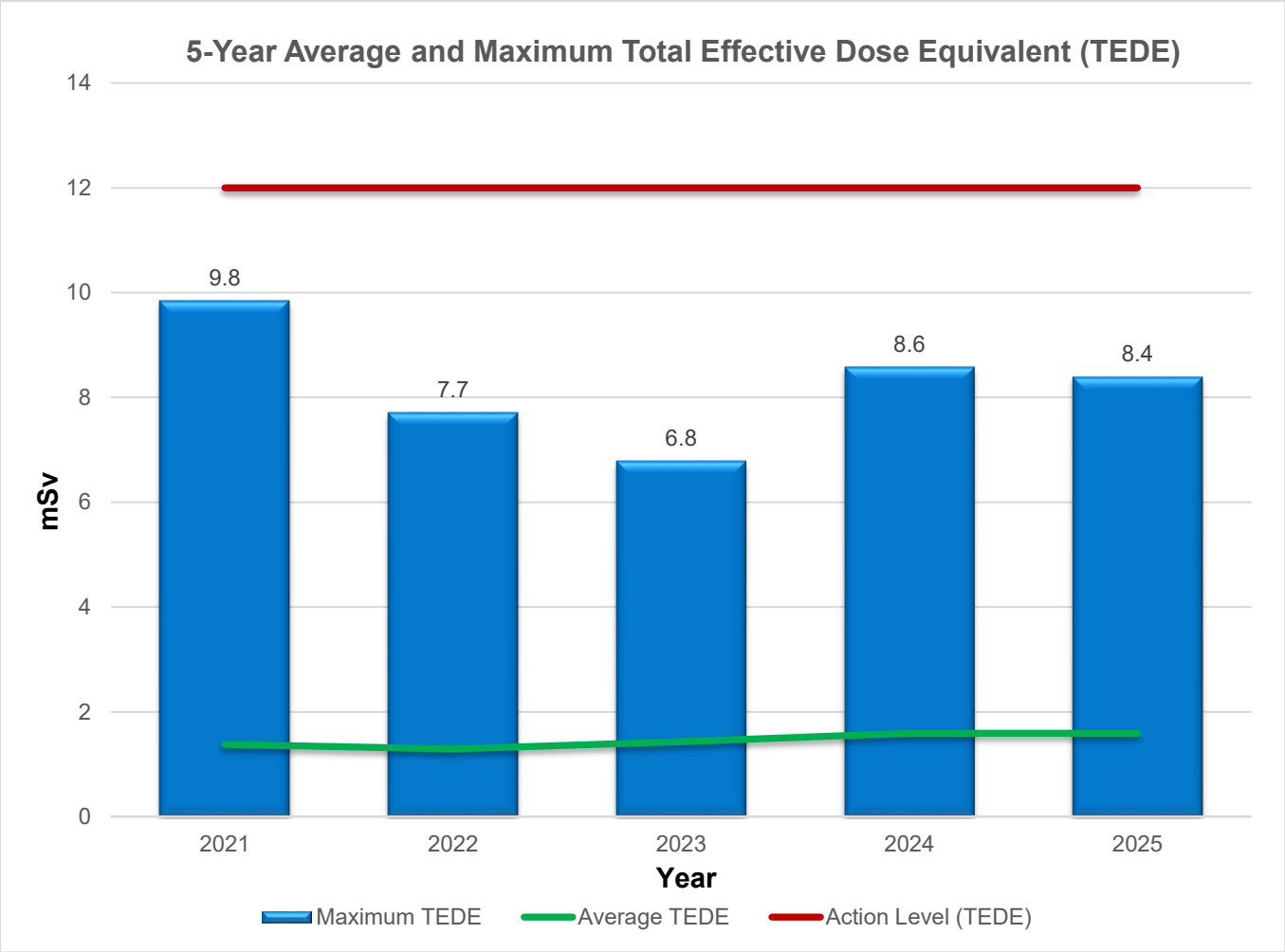

Figure 4: 5-Year Maximum and Annual Total Effective Dose Equivalent

The maximum individual five-year dose listed in Table 15 is well below the 100 mSv regulatory limit and the 60 mSv Action Level, with all five years of dose included for the 5-year period. Dose reduction continues to remain a priority, with ongoing efforts towards shielding, material movement, improving ALARA awareness (e.g. use of shielding blankets on product), and TLD wear and storage compliance.

Table 15: Maximum Individual Dose for CNSC 5-Year Range

	Year	All Workgroups
Maximum Individual (mSv)	2021-2025	35.16
	2016-2020	23.34
	2011-2015	35.61
	2006-2010	31.91

3.7.10 Equivalent Skin Dose

TLDs measure the skin doses received in each monitoring period. Skin dose is the measure of the radiation dose that is absorbed by the skin from the deposition of energy from low penetrating radiation.

Table 16 provides a summary of equivalent skin dosimetry measurements with monitored workers grouped in various ranges of exposure. Approximately 55% of skin doses are less than 1 mSv. Equivalent skin dose by work group is summarized in Table 17. The average annual skin dose trend for all monitored individuals is shown in Figure 5.

Skin doses have remained relatively stable, with no significant increase or decrease in the average dose. The equivalent skin dose continues to remain a fraction of the regulatory limit and Action Level.

Table 16: Skin Radiation Dose Equivalent Distribution

Year	Total # Individuals	Total # of Individuals in Dose Range (mSv)							
		0 - 1	1 - 5	5 - 10	10 - 20	20 - 50	50 - 100	100 - 200	200 - 500
2025	78	49	10	8	10	1	0	0	0
2024	67	37	14	4	11	1	0	0	0
2023	79	47	15	5	9	3	0	0	0
2022	69	41	12	6	9	1	0	0	0
2021	73	39	18	3	12	1	0	0	0

Table 17: Skin Radiation Dose Equivalent Summary

	Year	All Workgroups	Operators	Technicians	Staff
Maximum (mSv)	2025	30.01	30.01	2.28	1.16
	2024	25.76	25.76	1.97	1.59
	2023	25.15	25.15	1.98	1.60
	2022	21.67	21.67	1.94	1.85
	2021	30.87	30.87	1.97	1.66
Average (mSv/person)	2025	3.13	5.44	0.72	0.23
	2024	3.69	6.17	0.91	0.43
	2023	4.11	7.11	0.84	0.41
	2022	3.50	6.26	0.74	0.29
	2021	3.64	7.02	0.66	0.38

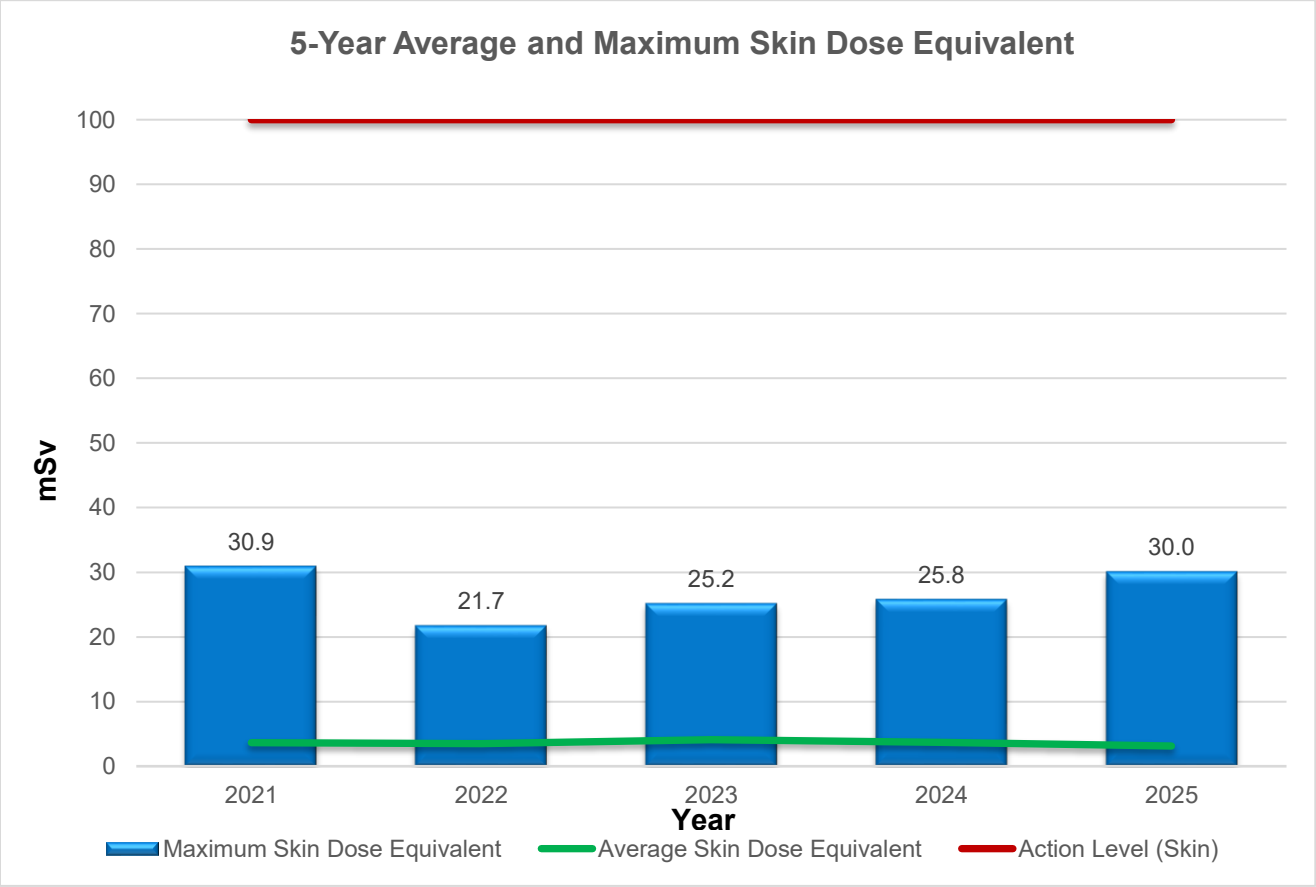

Figure 5: 5-Year Maximum and Average Skin Dose Equivalent

3.7.11 Equivalent Extremity Dose

Extremity doses are monitored using TLD rings worn by workers whose duties involve handling radioactive material. Currently, rings are worn for a one-week monitoring period each quarter. A scaling factor based on hours worked during the quarter is provided to the dosimetry service provider, who applies the factor to the measured dose to estimate the extremity exposure for the quarter.

A study evaluating extremity dose potential began in the fourth quarter of 2023 and continued into 2024, during which workers wore extremity TLD rings full time. As described in 3.7.8, the results of this study supported the implementation of full-time extremity TLD monitoring beginning in Q2 2026.

Table 18 provides a summary of equivalent extremity dosimetry measurements with monitored workers grouped in various ranges of exposure. All extremity doses were under 50 mSv for 2025. Equivalent extremity dose by work group is summarized in Table 19. Staff and Technicians do not routinely participate in the extremity monitoring program since there is minimal direct handling of product. The average annual extremity dose trend for all monitored individuals is shown in Figure 6. The extremity doses have remained relatively steady on average over the past five years.

Table 18: Total Extremity Dose Equivalent Distribution

Year	Total # Individuals	Total # of Individuals in Dose Range (mSv)							
		0 - 1	1 - 5	5 - 10	10 - 20	20 - 50	50 - 100	100 - 200	200 - 500
2025	23	2	3	1	5	12	0	0	0
2024	22	2	3	4	3	10	0	0	0
2023	21	1	5	4	5	7	1	0	0
2022	23	2	4	2	7	7	1	0	0
2021	19	1	1	2	8	4	3	0	0

Table 19: Extremity Dose Equivalent Summary

	Year	All Workgroups	Operators	Technicians	Staff
Maximum (mSv)	2025	42.47	42.47	5.39	N/A
	2024	40.30	40.30	N/A	N/A
	2023	63.80	63.80	N/A	N/A
	2022	52.01	52.02	0.4	N/A
	2021	59.00	59.00	N/A	N/A
Average (mSv/person)	2025	20.48	21.17	5.39	N/A
	2024	17.58	17.58	N/A	N/A
	2023	18.39	18.39	N/A	NA
	2022	15.63	16.32	0.4	NA
	2021	23.70	23.70	N/A	NA

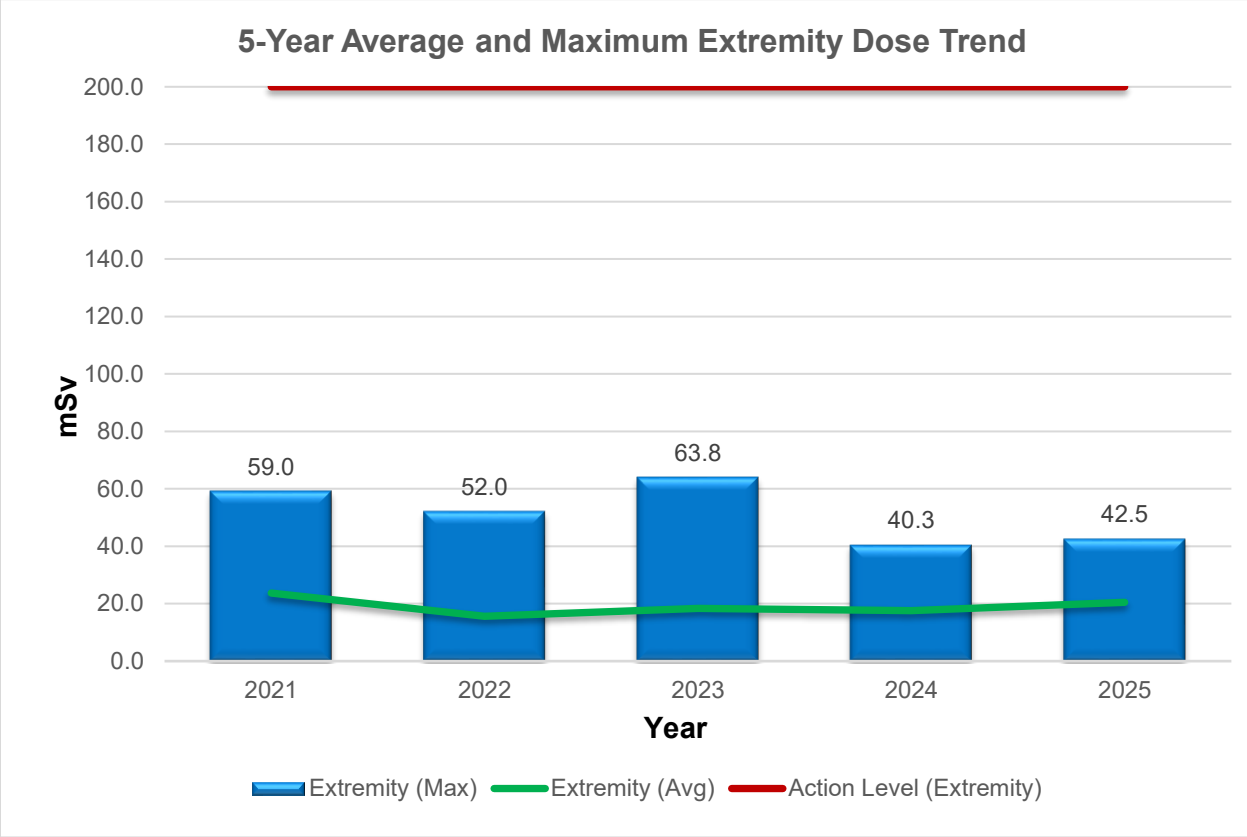

Figure 6: 5-Year Maximum and Average Extremity Dose

3.7.12 Equivalent Lens of an Eye Dose

Equivalent eye lens dose is measured using the whole body TLD. The dosimetry provider calculates the eye dose Hp(3), using the results from the multiple elements within the TLD. All workers wear safety glasses, which helps to shield against the beta radiation that contributes to eye lens dose.

The regulatory limit for a NEW is 50 mSv, shown in Table 12. Currently there is no Action Level in place at Peterborough for eye lens dose. An Internal Control Level was set at 4.25 mSv/quarter. The maximum dose for the year was 9.45 mSv and the average dose amongst all workgroups was 1.73 mSv. In 2025 all eye lens equivalent doses were under the regulatory limit and Internal Control Level. Overall, doses to the lens of the eye are well under the regulatory limit.

3.7.13 Total Estimated Doses to Members of the Public

Total effective radiation dose equivalent to members of the public are specified in the *Radiation Protection Regulations* and listed in Table 11. It is a calculated value, measured in mSv, which takes into account the absorbed dose to all organs of the body, the relative harm level of the radiation, and the sensitivities of each organ to radiation.

To ensure compliance with this regulation, BWXT NEC has established Derived Release Limits (DRLs) for uranium emissions to the environment. The facility DRLs account for the realistic exposure pathways as described in the facility Radiation Protection Program to restrict dose to a

member of the public to 1 mSv (1,000 µSv) per year, which is the regulatory dose limit. The DRLs assume that a member of the public occupies the BWXT NEC facility perimeter continuously (24 hours per day, 365 days per year). Note: Liquid effluent is not included in the calculation of public dose as the effluent is discharged directly to city sewer systems and is not used for drinking. The estimated effective dose as a result of air releases is calculated through direct correlation with the facility DRLs.

In addition, the contribution from gamma radiation emission to the nearest member of the public is calculated from the net sum of the nearest environmental TLD results from all monitoring periods. The calculation assumes that a member of the public occupies the nearest residence for 66% of their time for the entire year.

Over the reporting period, the radiation dose to members of the public surrounding the BWXT NEC Peterborough facility was a small fraction of the applicable regulatory dose limit as shown in Table 20. As a result of the facility operations, the total estimated radiation dose to a member of the public is 5.7 µSv (0.0 µSv from air emissions + 5.7 µSv from direct gamma radiation). In comparison to the 1 mSv (1,000 µSv) per year effective dose limit to a member of the public, dose from the operations is very low at 0.6%.

Table 20: Estimated Radiation Doses to Members of the Public

Period	Estimated Annual Public Dose (µSv)	% of Public Dose Limit (1,000 µSv = 1 mSv)
2025	5.7	0.6%
2024	0	0.0%
2023	0	0.0%
2022	11.5	1.1%
2021	0.0	0.0%

3.8 Conventional Health and Safety

The "Conventional Health and Safety" Safety and Control Area covers the implementation of a program to manage non-radiological workplace safety hazards and to protect personnel and equipment.

BWXT NEC has a well-established integrated management system for Environment, Health and Safety (EHS) Program excellence. This is ensured through the effective implementation of program elements. BWXT NEC has an established *EHS Mission Statement* that is reviewed and signed annually by the President of BWXT NEC. BWXT NEC's objective is to eliminate or minimize as low as reasonably achievable both known and potential environmental, safety and health hazards which could impact our employees and the communities in which they live. EHS is a shared responsibility, top business priority and is continually improved.

Key components of the Environment, Health and Safety Program include:

- Compliance with all safety and health-related regulatory requirements;
- The setting of EHS goals and objectives;
- Hazard recognition, risk assessment and change control processes;
- A comprehensive worker training program; and,
- Documented safety concerns, near misses and incidents with appropriate root-cause analysis, and preventative and corrective actions.

The EHS Program includes all worker safety elements that demonstrate compliance with relevant regulations, codes and standards:

- EHS Policy
- Hazard Analysis and Regulatory Compliance
- Employee Involvement
- EHS Specialist
- Accident/Incident Investigation
- EHS Training
- Housekeeping
- Personal Protective Equipment
- Contractor Safety
- Emergency Preparedness/Response
- Risk Assessments
- High Risk Operations
- Industrial Hygiene
- Chemical Management
- Ergonomics
- Lock-Out Tag-Out

Continuous improvement is achieved through several review processes, including site inspections, reported safety concerns, and near miss and incident investigations. The effectiveness of the overall program is reviewed throughout the year and evaluated in the annual management review (section 3.2.3).

3.8.1 Workplace Safety Committees

Ten meetings were held with quorum, and a total of 96 investigations and inspections were conducted in the reporting period. This includes Workplace Safety Committee (WSC) inspections, manager inspections, emergency response drills, and near miss, incident and injury investigations. These investigations and inspections led to a total of 125 actions logged and tracked to closure. The top finding categories were ‘housekeeping’ ‘emergency equipment, and walking/working surfaces’. Established WSC goals for the reporting period are summarized in Table 21.

Table 21: Workplace Safety Committee Goals and Results

WSC Goals	Actual	Result
Meet at least 9 times/year	10/12	Complete
ALARA and Beryllium Committee Guest Attendance and Discussion	2/2	Complete
Inspection tour completion target of 24 out of a possible 36 (12 months x 3 areas)	25/36	Complete
CSE location and procedure review	1/1	Complete

2026 WSC goals are established as follows:

1. Meet at least nine times as required by the *Canada Labour Code Part II*.
2. Beryllium Committee guest attendance and discussion.
3. Inspection tour completion target of 24 out of a possible 36 (12 months' x 3 areas).
4. Review a section of the *Canada Occupational Health and Safety Regulations* (SOR/86-304) each month).

3.8.2 Hazardous Occurrences

Under the *Canada Occupational Health and Safety Regulations* there are several different types of hazardous occurrences including:

- Minor Injury: any employment injury or an occupational disease for which medical treatment is provided and excludes a disabling injury.
- Disabling Injury: any employment injury or an occupational disease that results in either time loss, or modified duties. Disabling injuries can be either temporary, or permanent, depending on whether the employee is expected to make a full recovery.
- Loss of Consciousness: from an electric shock or a toxic or oxygen deficient atmosphere.
- Rescue / Revival or other Emergency Procedures: any incident that requires emergency procedures to be implemented, such as a hazardous substance spill, bomb threat or violence prevention procedure.

Annual reports are provided to the Minister of Employment and Social Development Canada as required by regulation.

3.8.2.1 Injuries and Illness

BWXT NEC Peterborough had nine consecutive years without a Lost Time Injury (LTI) prior to 2021 (Refer to Table 22). During the reporting period, there was 1 lost time injury, 1 minor injury and 14 first aids. The top injury categories were 'contact by ' and 'struck against'. There were 41 near misses in 2025 logged following defined event classification criteria. The top noted root causes were 'human error', 'inadequate job planning, instruction, supervision', and 'Inadequate Mechanical Integrity / Maintenance Management'.

Table 22: Lost Time Injuries

2021	2022	2023	2024	2025
1	2	0	0	1

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 NEC 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 facility has a well-established environmental management system to ensure effective monitoring programs are in place to achieve environmental goals and regulatory compliance. The environmental protection program is compliant with:

- CSA N288.6-12 (R2017), *Environmental risk assessments at Class I nuclear facilities and uranium mines and mills*,
- CSA N288.5:22, *Effluent and emissions monitoring programs at nuclear facilities*, and
- CSA N288.4:19 (R2024), *Environmental monitoring programs at nuclear facilities*.

3.9.1 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been completed in accordance with CSA N288.6:22. The ERA was updated in 2023 and revised in February 2025 to address comments from CNSC staff. The assessment concluded that emissions from the facility are very low and no adverse effects to human health or the environment are expected.

The ERA evaluated potential radiological and non-radiological exposures, as well as noise associated with facility operations. Radiological dose to members of the public was assessed to be well below applicable regulatory limits.

Emissions of non-radioactive contaminants from the facility were below the MECP Point of Impingement (POI) standards, and releases to water were also assessed to be minimal. Based on these results, emissions from the facility are not expected to result in adverse effects on human health or the environment.

The ERA also concluded that emissions of radioactive and non-radioactive materials from the facility pose no adverse effects to non-human biota.

The ERA is available on BWXT NEC's public information website: www.nec.bwxt.com.

3.9.2 Environmental Management System

BWXT NEC has a well-established integrated management system for Environment, Health and Safety Program excellence. This is ensured through the effective implementation of program elements. BWXT NEC has an established *EHS Mission Statement* that is reviewed and signed annually by the President of BWXT NEC. BWXT NEC's objective is to eliminate or minimize as low as reasonably achievable both known and potential environmental hazards which could impact our employees and the communities in which they live. EHS is a shared responsibility, top business priority and is continually improved.

An Environmental Management System is in place to identify and control environmental aspects and drive continuous improvement to enhance performance and minimize risk to the employees and the public.

Key components of the environmental protection program include:

- Compliance with all environmental-related regulatory requirements;
- The setting of environmental goals and objectives;
- Hazard recognition, risk assessment and change control processes;
- A comprehensive worker training program; and,
- Documented environmental concerns, near misses and incidents with appropriate root-cause analysis, preventative and corrective actions.

The EHS program includes all environmental protection elements that demonstrate compliance with relevant regulations, codes, and standards:

- Air
- Water
- Waste
- Dangerous goods shipping
- Boundary radiation monitoring
- Soil sampling

Continuous improvement is achieved through several review processes, including site inspections, reported concerns, near miss and incident investigations, self-assessments, and audits. Environmental goals performance is discussed in section 3.9.4. Following these proactive reviews, the findings are documented, and corrective actions identified and tracked to completion.

Internal inspections are completed on a routine basis and include all areas of the facility. The purpose of these inspections is to identify environmental as well as health and safety issues. WSC members carry out routine site inspections. After an inspection, the findings are documented, corrective actions identified and submitted to responsible personnel to address. Depending on the complexity of the finding immediate action may be required (e.g., equipment shutdown), or the action may be incorporated into meeting minutes, or tracked in the ATS.

Minor administrative updates were made to the Environmental Management System (EMS) in early 2025 following an internal EMS audit. The procedure was revised again later in the year to address actions identified during the REGDOC-2.9.2 gap analysis. The updated procedure will be finalized and formally approved in 2026.

3.9.3 Effluent and Environmental Monitoring Programs

Small amounts of radiological and non-radiological substances are released to the environment as the result of operations at BWXT NEC. Environmental protection is regulated municipally for water effluent through sewer-use by-laws, provincially for air effluent, and federally by the CNSC for both air and water. Airborne and waterborne radiological and non-radiological emissions to the environment are monitored as part of the effluent monitoring programs. BWXT NEC's effluent and environmental monitoring program is comprised of the following components:

1. Air effluent
2. Water effluent
3. Soil sampling

BWXT NEC has established CNSC accepted Action Levels for various environmental parameters. An Action Level is defined in the *Radiation Protection Regulations* as “a specific dose of radiation or other parameter that, if reached, may indicate a loss of control of part of a licensee’s Radiation Protection Program, and triggers a requirement for specific action to be taken.” Action Levels are also applied to environmental protection. Action Levels are set below regulatory limits; however, they are CNSC reportable events. Accordingly, BWXT NEC has established Internal Control Levels for various environmental parameters that are set even lower than Action Levels to act as an early warning system. Internal Control Level exceedances trigger an internal investigation and corrective actions; however, they are not CNSC reportable events. During the reporting period, no Action Levels or regulatory limits were exceeded. One Internal Control Level (ICL) exceedance for beryllium in water effluent occurred during the reporting period. The exceedance was documented and investigated, and corrective actions were assigned and tracked to completion in Gensuite®.

3.9.3.1 Independent Environmental Monitoring Program

To complement existing and ongoing compliance activities and site monitoring programs, the CNSC implemented its Independent Environmental Monitoring Program (IEMP) to verify that the public and environment around CNSC-regulated facilities are not adversely affected by releases to the environment. This verification is achieved through independent sampling and analysis by the CNSC. This program applies to the BWXT NEC operations. The most recent results are available for sampling conducted in 2024. The results are compared to relevant provincial and federal guidelines and are available on the CNSC website.

3.9.4 Environmental Protection Program Performance

Environmental protection goals and results are summarized in Table 23.

Table 23: Environmental Protection Program Goals

Environmental Protection Program Goals	Actual	Result
Improve the chemical storage and chemical handling in the boiler room	Complete	Achieved
Complete one asbestos abatement project by year end	Complete	Achieved

2026 Environmental Protection goals are established as follows:

1. Safely decontaminate the decommissioned fuel trailer to prevent environmental impact in accordance with regulatory and site release requirements.
2. Complete one asbestos abatement project.

3.9.5 Air Effluent Monitoring

BWXT NEC Peterborough is currently in the transition from an Environmental Compliance Approval (ECA) to an EASR (Environmental Activity and Sector Registry) with the MECP for air emissions.

The site maintains emission summary and dispersion modelling reports and acoustic assessment reports that demonstrate compliance with relevant legislation. An annual summary report is submitted to the MECP. Monitoring of airborne emissions is not required by the MECP as the emissions are deemed to be insignificant in accordance with MECP methodology. Due to the additional regulation by the CNSC, uranium and beryllium stack emissions are both monitored and compared to CNSC Action Levels.

A single process uranium air emission point exists. The R2 Area exhaust system exhausts through a High Efficiency Particulate Air (HEPA) filter. The facility performs continuous in-stack monitoring drawing a sample of air across a filter capable of trapping uranium dust. The filter papers are analyzed in-house and verified externally by an independent laboratory by delayed neutron activation analysis. The minimum detection limit is 0.01 µg uranium. Results are compared to the previous results and to the Internal Control Level and Action Level of 1.0 µg/m^3. Measured uranium air emissions are included in the estimated dose to members of the public through direct correlation with facility DRLs. Details are provided in section 3.7.13.

The facility also uses beryllium as part of the fuel bundle manufacturing process. The *Environmental Protection Act of Ontario* (R.S.O. 1990, c. E. 19) and *Ontario Regulation 419/05 Air Pollution – Local Air Quality* determine the permitted concentration of contaminant release. The limit at the POI for Beryllium is 0.01 µg per cubic meter of air (µg/m^3). The POI is the plant/public boundary. Three beryllium air emission points exist. The facility performs continuous in-stack monitoring drawing a sample of air across a filter capable of trapping beryllium. The filter is analyzed for beryllium using the Atomic Absorption method or the Inductively Coupled Plasma – Atomic Emission Spectrometer method at an accredited external independent laboratory. The result is related to the air volume passed through the filter. The minimum detection limit is 0.002 µg beryllium. A calculation of the concentration is then made based on the volume of air drawn across the filter. These values are compared to the previous results, and to the Internal Control Level of 0.01 µg/m^3 and Action Level of 0.03 µg/m^3 at the stack exit, which are both very conservative.

A summary of air effluent sampling results is in Table 24. Uranium air releases continue to remain low and well below the Action Level of 1 µg/m^3, as shown in Figure 7. Earlier annual compliance reports include uranium stack air emissions that were compared to a mass-based release limit, rather than the concentration-based limit established in the current Licence. The five-year trend of annual beryllium air concentrations presented in Figure 8 shows stable performance with very low measurements.

Table 24: Air Effluent Sampling Summary

Stack Description	Emission Contaminant	Total Number of Samples	Action Level (µg/m^3) (# Samples Exceeding Level)	Licence Release Limit (µg/m^3) (# Samples Exceeding Limit)	Highest Value Recorded (µg/m^3)	Average Value Recorded (µg/m^3)
R2 Area	Uranium	51	1.0 (0)	410 (0)	4.59×10^{-3}	1.07×10^{-3}
North	Beryllium	51	0.03 (0)	2.6 (0)	1.39×10^{-4}	3.09×10^{-5}
Acid	Beryllium	51	0.03 (0)	2.6 (0)	1.28×10^{-3}	2.39×10^{-4}
South	Beryllium	51	0.03 (0)	2.6 (0)	2.17×10^{-5}	6.86×10^{-6}

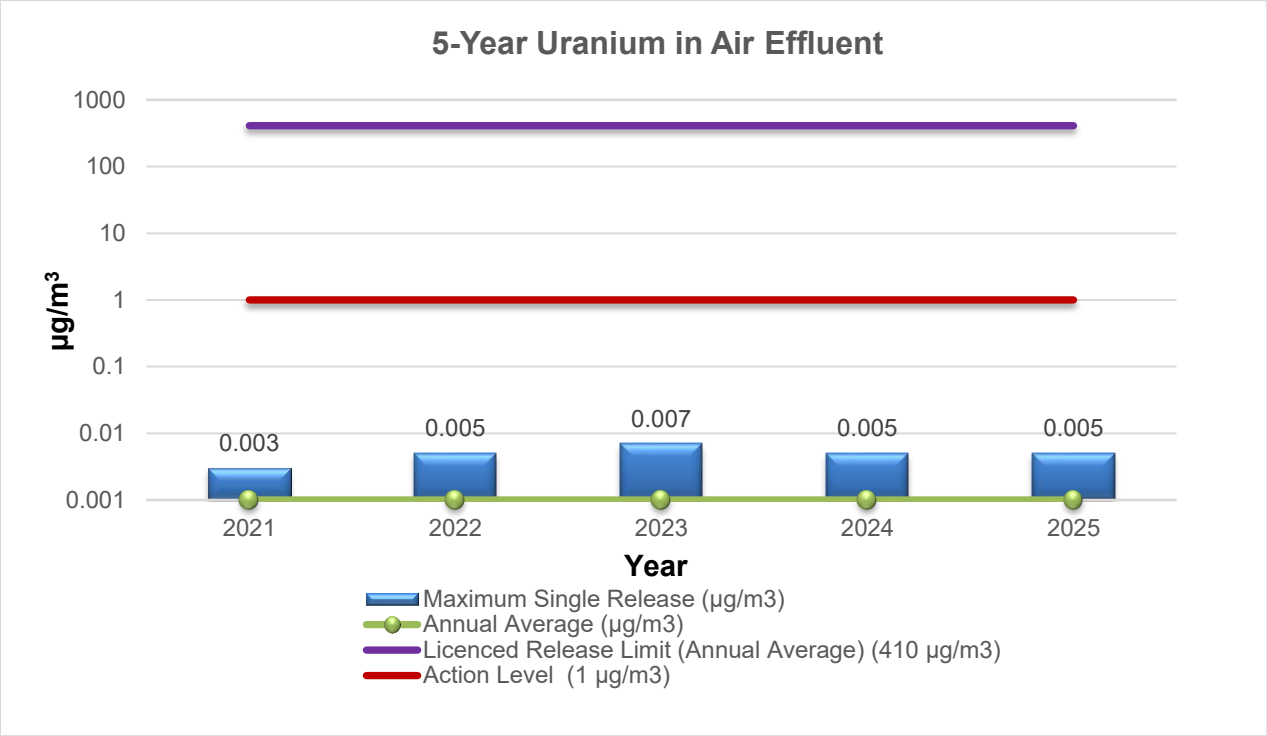

Figure 7: 5-Year Uranium in Air Effluent

Note: The above graph has a logarithmic scale.

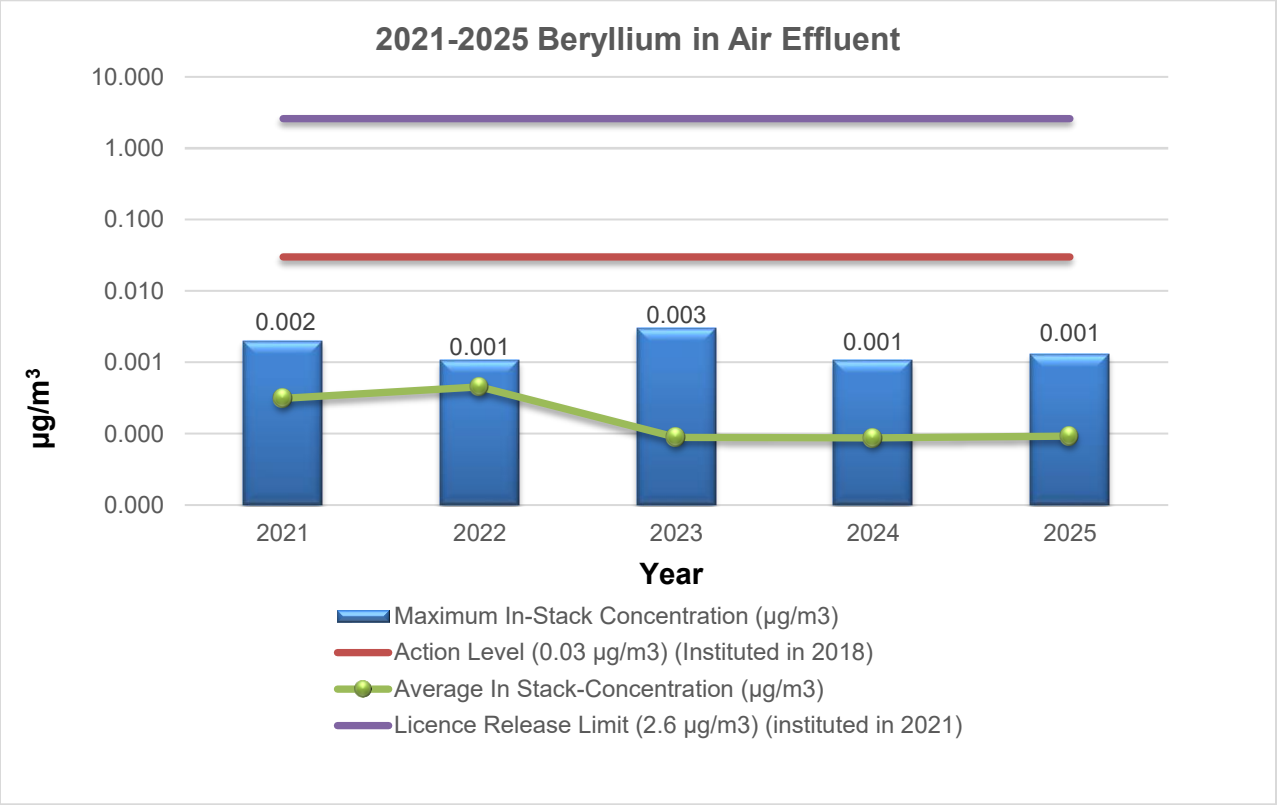

Figure 8: 5-Year Beryllium in Air Effluent

Note: The above graph has a logarithmic scale.

3.9.6 Water Effluent Monitoring

All potentially uranium-contaminated wastewater is held for determination of the quantity and concentration of uranium prior to discharge. Liquid waste generated from routine activities, such as washing floors, walls and equipment in the uranium pellet loading and end closure weld area is held in a 205-Litre (45-gallon) drum stored in the maintenance area. Most of the potentially contaminated wastewater originates from floor washing. The water is filtered and agitated prior to sampling, and then sent for independent analysis at an accredited external laboratory. The minimum detectable concentration is 0.000002 mg U/L (parts per million (ppm)). After the wastewater sample result is verified to be below the Internal Control Level of 3 ppm (per batch) and the Action Level of 3 ppm (annual average), the wash water undergoes additional filtration and is then discharged to the sanitary sewer.

A summary of uranium in water effluent sampling results is presented in Table 25. Uranium water releases continue to remain low and below the Action Level of 0.003 g/L (3 ppm (annual average)), and the licenced release limit of 0.14 g/L (weekly composite), as presented in Figure 9. Refer to previous annual compliance reports for historical uranium-in-water emissions, which were evaluated against a mass-based release limit rather than the concentration-based limit established in the current Licence.

Table 25: Uranium in Water Effluent Sampling Summary

Uranium	2021	2022	2023	2024	2025
Total Amount of Liquid Discharged (L) from Uranium Processing Areas	410	820	615	615	1025
Average Concentration (at the point of release) (ppm)	0.22	0.30	0.07	0.01	0.03
Maximum Concentration (at the point of release) (ppm)	0.41	0.78	0.20	0.01	0.06
Number of Samples Exceeding Internal Control Level (3 ppm)	0	0	0	0	0
Number of Samples Exceeding Action Level (3 ppm annual average)	0	0	0	0	0

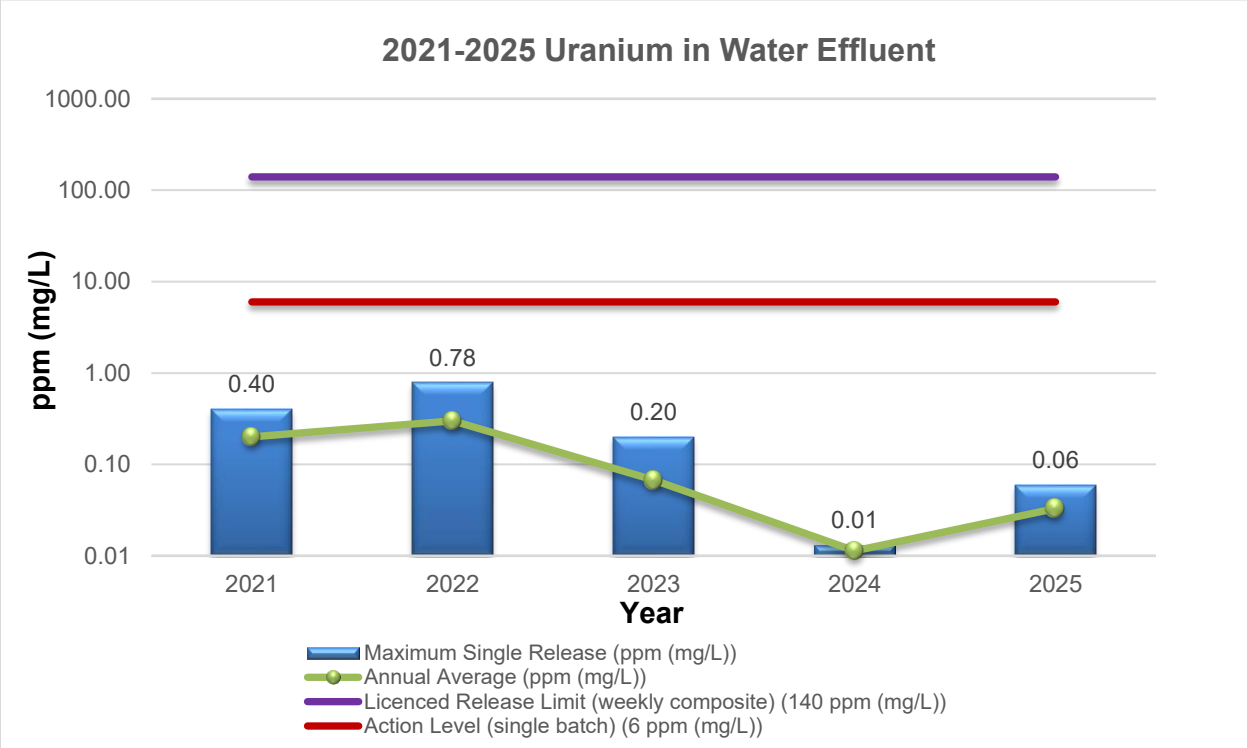

Figure 9: 5-Year Uranium in Water Effluent

Note: The above graph has a logarithmic scale.

A second liquid effluent is beryllium in water that is generated from equipment use and cleaning activities in the beryllium classified areas. BWXT NEC has established an Internal Control Level of 4 µg/L and Action Level of 40 µg/L. The Internal Control Level is conservatively consistent with international drinking water guidelines for beryllium, noting that the discharge point is to the sanitary sewer (i.e., not to drinking water). All potentially beryllium-contaminated water passes through a weir settling system prior to release to the sanitary sewer. Regular sampling of the beryllium wastewater is conducted. The water sample consists of a 24-hour composite sample taken from the outflow line. It is sent for analysis at an external accredited independent laboratory using inductively coupled

plasma mass spectrometry (ICP-MS). The minimum detectable concentration is 0.007 µg Be/L (0.000007 mg Be/L or parts per million (ppm)). Sampling results are presented in Table 26.

Beryllium average and maximum concentrations are trending steady, as presented in Figure 10. Where Internal Control Levels are exceeded, internal investigation is conducted to determine the cause and corrective/preventative actions are tracked to closure.

Table 26: Beryllium in Water Effluent Sampling Summary

Beryllium	2021	2022	2023	2024	2025
Total Number of Samples Analyzed for Beryllium Concentration in Water	17	18	20	16	18
Average Concentration (at the point of release) (µg/L)	0.9	0.8	0.6	0.4	0.6
Maximum Concentration (at the point of release) (µg/L)	3.1	3.3	3.8	1.4	6.1
Number of Samples Exceeding Internal Control Level (4 µg/L)	0	0	0	0	1
Number of Samples Exceeding Action Level (40 µg/L)	0	0	0	0	0

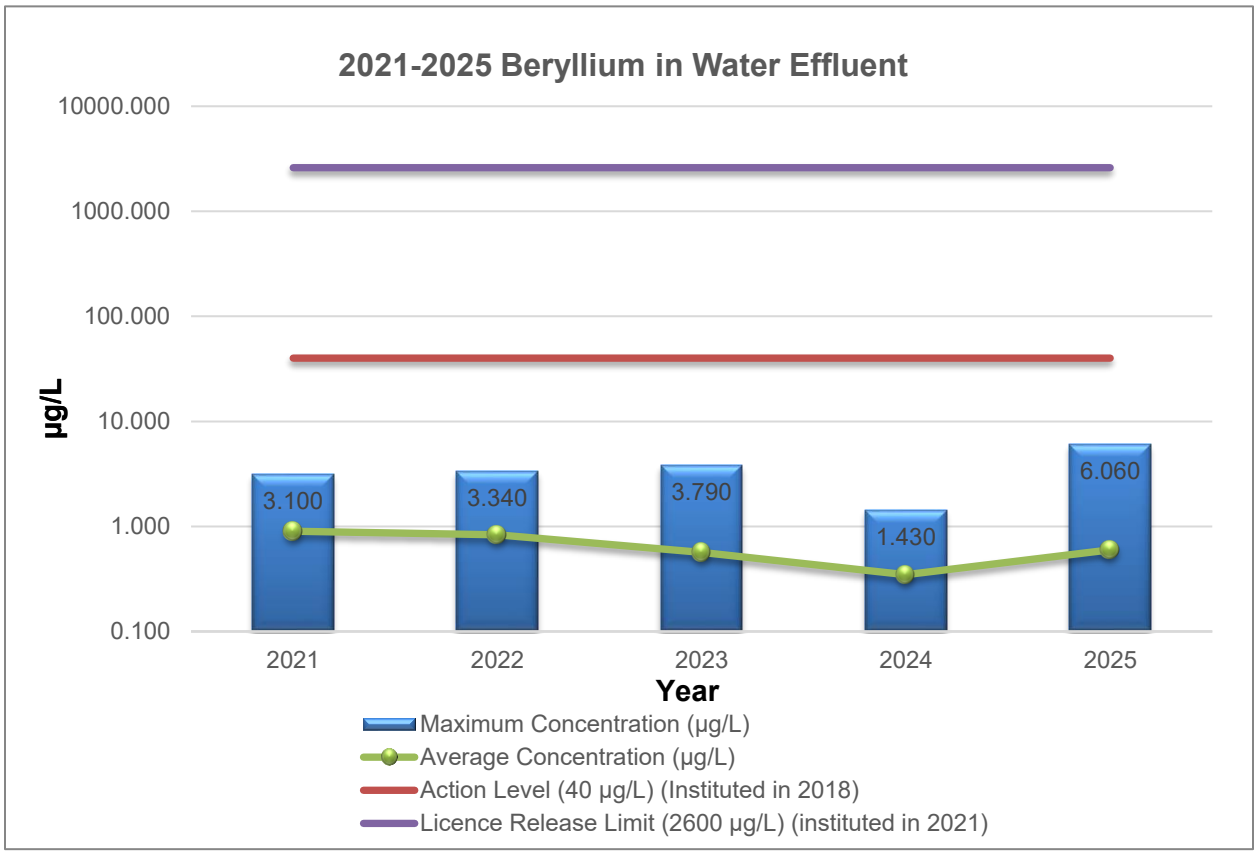

Figure 10: 5-Year Beryllium in Water Effluent

Note: The above graph has a logarithmic scale.

3.9.7 Soil Sampling Measurements/Monitoring

Facility air emissions are the primary pathway for potential release into the natural environment by impingement on the ground surface in the immediate vicinity of the facility depending on the wind direction. Uranium and beryllium may be washed into the soil by rainfall, snow, etc. Depositions of uranium or beryllium are detected by taking small samples of surface soil and analyzing. Soil sampling for beryllium and uranium started in 2021 and is conducted annually by a third-party consultant. If soil analysis indicates concentrations higher than the background levels and MECP standards or rising levels, emissions may have increased, and investigation can be made into the cause.

Samples of surface soil are retrieved from various locations in accordance with a documented plan, in 2025, a Peterborough facility garden was added as a sampling location as well as an extra background sample at the Curve Lake First Nations Powwow Grounds. The sampling methodology used is based on the MECP *Guidelines on Sampling and Analytical Methods for Use at Contaminated Sites in Ontario*, December 1996, ISBN-0-7778-4056-1. A total of four (3-Emily-Omemee Park, 1- Curve Lake First Nations Powwow Grounds) quality control soil samples at a background locations are taken, along with two replicate samples for field quality control purposes. The routine soil sample typically collected at Bonnerworth Park could not be obtained during the 2025 reporting period due to construction activities within the park.

The soil samples are stored in a cooler with ice and transported the next day for analysis at an independent accredited laboratory by Inductively Coupled Plasma Mass Spectrometry for uranium and beryllium content. The minimum detectable concentration of uranium is 1.0 part per million (1.0 µg U/g). The minimum detectable concentration of beryllium is 0.5 part per million (0.5 µg Be/g). Results are compared to previous years and the MECP guidelines.

The results of the soil sampling program were compared to the stringent standards in MECP Table 1 (Full Depth Background Site Condition Standards). For residential, parkland, institutional, industrial, commercial, and community property uses, the standard is 2.5 µg/g for both uranium and beryllium.

A summary of results taken in the reporting period is listed in Table 27.

Table 27: 2025 Soil Sampling Result Summary

	Uranium	Beryllium
MECP Guideline (µg/g)	2.5 µg U/g	2.5 µg Be/g
Minimum Detectable Limit (µg/g)	1.0	0.5
Number of Samples Taken	14	14
Average concentration (µg/g)	<1.0	<0.50
Maximum concentration (µg/g)	<1.0	0.53

The analytical results for uranium and beryllium concentrations for all soil samples analyzed are without exception well below the acceptable standard published by the MECP Table 1 Background Site Condition Standards. Based on the results of the sampling program there is no evidence that uranium or beryllium used at the BWXT NEC facility has had any impact on Peterborough soils. No risk has been identified to the soils or to the public of Peterborough.

3.10 Emergency Management and Fire Protection

The emergency preparedness and fire protection programs are well-established and effective. The facility has an established emergency plan that describes the actions to be taken to minimize the health and environmental hazards, which may result from fires, explosions, or the release of hazardous materials. The plan includes effects to the local area and members of the public. The plans are intended to reduce the risk of fires within the facility and assist emergency staff and plant personnel in understanding key emergency response issues, and assist the facility in protecting employees, the local community, and the environment through sound emergency management practices. The emergency plan is developed in accordance with applicable standards and meets the CNSC operating Licence requirements.

Continuous improvement is achieved through several review processes, including site inspections, reported safety concerns, near miss and incident investigations, drills, and self-assessments. Non-conformances are tracked to closure.

The EMO was activated once during the reporting period. On September 25, 2025, the EMO was activated due to a possible gas leak that turned out to be a false alarm.

On January 7, 2025, a fuel Maintenance Technician observed 3-4 small zirconium ignition events on the 6 side of End Closure Weld workstation 5/6. This occurred in the metal zirconium shaving collection bin beneath cutter head 6, which is designed to safely contain such events. Two preventative actions were entered into the Action Tracking System (ATS) in Gensuite® and have been closed.

On November 20, 2025, there was a small zirconium shavings ignition event contained to the metal covered cutting station shaving collection location on the datum end of the Cut-to-Length machine 65. The operator used the supplied Class D fire extinguishing agent to extinguish the ignition. The event was recorded into Gensuite®, investigated, and actions assigned that will be tracked to closure.

3.10.1 Emergency Preparedness Program Activities

The facility continues to update and improve its Emergency Response Program. Program improvements including revisions to emergency response work instructions were made during the reporting period.

Emergency preparedness training is achieved through response drills where responses are critiqued to continually improve the effectiveness of the process. These are conducted at least annually. All employees are trained on established fire prevention measures, emergency situation responses, emergency evacuation routes and their responsibilities. Awareness training is conducted during new employee orientation and refreshed through response drills. On-site emergency responders are provided with the level of training necessary to allow them to effectively perform their designated functions as defined the training matrix. Training course completion is summarized in Table 4. Tests of the emergency response plans were performed in the following areas:

1. Fire safety/evacuation (three),
2. Full scale emergency exercise with Peterborough Fire Services and activation of the Emergency Management Organization (EMO) (one),
3. Activation of the Emergency Management Organization (EMO) (two),
4. Practical spill response drill (one).
5. Graphite coater – Lower Explosive Limit (LEL) alarm activation (one)

3.10.2 Fire Protection Program Activities

The Fire Protection Program describes the systems and resources available to prevent and detect fire and to minimize impact from a fire event and consists of the following key elements:

- Fire and Life Safety Features,
- Inspection and Maintenance,
- Fire Protection Assessment,
- Fire Protection,
- Housekeeping,
- Minimization of Combustibles,
- Ignition Source Control,
- Impairment,
- Design for the Prevention and Mitigation of Fires,
- Training,
- Outside Coordination, and
- Program Assessment.

The documented Fire Hazards Analysis (FHA) identifies the facility fire hazards and their potential impact on worker and public safety, and asset protection. FHAs are available for Building 21, Building 24, and Buildings 26/28. In March of 2024 an on-site inspection for the FHA was completed, and the updated document was issued on April 15, 2025.

The facility maintains a documented fire safety plan that is developed in accordance with the *National Fire Code of Canada (NFCC),* the *National Building Code of Canada* and CSA N393-13, *Fire protection for facilities that process, handle, or store nuclear substances*. The fire safety plan is based on the documented FHA and ensures that measures are appropriate to the facility. The fire safety plan provides information on resources in the buildings, emergency procedures and actions to be taken in the event of a fire. It includes training, duties of designated personnel, details of maintenance procedures and fire protection measures. The information assists the occupants in utilizing life safety features in the buildings, ensures an orderly evacuation at the time of an emergency and provides a maximum degree of flexibility to achieve the necessary fire safety for the buildings. The fire safety plan was sent to Peterborough Fire Services in November 2025 and was approved January 6, 2026.

Fire protection systems are inspected and tested in accordance with the *National Fire Code of Canada* following an established schedule. A third-party review and an internal self-assessment are conducted annually. Identified continuous improvements are tracked to completion using the ATS.

The program facilitates effective communication and exchange of relevant information, and assures timely, reliable, and effective decision making and response actions. Site hazard reviews and site familiarization tours are offered annually with Peterborough Fire Services. After the 2025 exercise with Peterborough Fire Services, many fire services members stayed on site for a familiarization tour.

3.11 Waste Management

The "Waste Management" Safety and Control Area covers internal waste and by-product related programs which form part of the facility's operations, up to the point where the waste is removed from the facility to a separate waste and by-product management facility. This Safety and Control Area also covers the ongoing decontamination and planning for decommissioning activities.

Radioactive wastes are any materials that contain a nuclear substance, and which have been declared to be waste. BWXT NEC has an effective and well-established 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 operating Licence Conditions. Radioactive solid wastes generated from fuel manufacturing, which consist of, or are contaminated by uranium are accumulated in controlled and classified areas. A low volume of radioactive wastes from Peterborough are transported to and consolidated with the Toronto facility wastes. These are combined, compacted for volume reduction where possible, and shipped routinely to a licensed radioactive waste disposal facility.

Waste management and generation details are further described in Appendix B, submitted to the CNSC separately.

BWXT NEC maintains a Preliminary Decommissioning Plan (PDP) and Financial Guarantees in accordance with CNSC regulatory requirements and applicable standards. The 2023 Peterborough facility PDP was reviewed against the criteria set in CSA Standard N294-19, *Decommissioning of Facilities Containing Nuclear Substances* (November 2019), CNSC REGDOC-2.11.2, *Decommissioning* (January 2021), and CNSC REGDOC-3.3.1, *Financial Guarantees for the Decommissioning of Nuclear Facilities and Termination of Licensed Activities* (January 2021).

The PDP strategy and end-state objective of decommissioning is to release the site from regulatory control for industrial use or demolition of the structures. These are reviewed at least once every five years. The PDP summaries for Peterborough and Toronto remain available on our website (www.nec.bwxt.com).

In November of 2022, BWXT NEC submitted an updated PDP to CNSC staff, which was revised in August of 2023 and was accepted by CNSC staff in October of 2023. In 2024, the CNSC Commission accepted the revised financial guarantee amount and BWXT NEC put in place the required financial guarantee instruments to reflect these accepted amounts.

The facility conducts an annual Waste Audit and Waste Reduction Work Plan due to the large office space, in accordance with *Ontario Regulation* 102/94 under the *Environmental Protection Act*. The audit serves to assess and advance the non-nuclear waste diversion initiatives and consists of the physical collection and sorting of generated waste and includes a waste composition study. It provides a prepared Waste Reduction Work Plan where areas of success are highlighted and opportunities for improvement are identified through waste reduction, reuse, and recycling. The results of the audit are communicated to employees and waste reduction, and diversion initiatives are undertaken.

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 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 Program outlines the systems, processes and responsibilities for performing security operations with the objective of maintaining a safe and secure facility. The program manual identifies

the individual responsibilities for implementation and maintenance of the program. The manual includes instructions for administering the Security Program, provides the basis for security protocols and identifies the controls in place to meet regulatory requirements. Program details are prescribed information and confidential. Examples of security measures in place include:

- Access control (access cards and locked restricted-access areas);
- Facility Access Security Clearance Program;
- Security guards;
- Security barriers;
- Intrusion detection systems; and,
- Preventing the unauthorized removal of nuclear material.

3.13 Safeguards and Non-Proliferation

The "Safeguards and Non-proliferation" Safety and Control Area covers the programs required for the successful implementation of the obligations arising from the Canada/IAEA Safeguards and Non-proliferation Agreement. BWXT NEC has implemented and maintains a Safeguards Program and undertakes all required measures to ensure safeguards implementation in accordance with IAEA commitments and CNSC REGDOC-2.13.1 *Safeguards and Nuclear Material Accountancy.* Movement of safeguarded nuclear material (inventory changes) are documented and reported to the CNSC as required.

BWXT NEC has implemented and maintains a well-established Safeguards Program and undertakes all required measures to ensure IAEA commitments and CNSC regulatory requirements are met. BWXT NEC reports all Inventory Change Documents through the Nuclear Materials Accountancy Reporting system.

The Physical Inventory Taking (PIT), was conducted in July and was followed by a Physical Inventory Verification (PIV) and Design Information Verification (DIV) on July 24th and 25th which involved both the CNSC and the IAEA. The scope of the PIV concerned book examination, physical verification of nuclear material and evaluation of the quality and performance of BWXT NEC's measurement system. The scope of the DIV concerned verification of the facility, general building design, essential equipment, accounting procedures, operator's measurement system, nuclear material characteristics, nuclear material location and flow and operational status of the facility. No non-conformances were noted.

Two short notice random inspections took place during the reporting period on March 10th and on September 25th. The inspection involved physical examination of bundle boxes, sampling and scanning of pellet skids and verification of records. No non-conformances were noted during the inspections.

3.14 Packaging and Transport of Nuclear Substances

The "Packaging and Transport of Nuclear Substances" Safety and Control Area covers the packaging and transport of nuclear substances and other nuclear materials to and from the licensed facility. In the reporting period, all packaging and shipments to and from the facility were conducted safely according to applicable regulations. Shipments of dangerous goods are not routinely made from BWXT NEC by air, rail, or water. Routine road shipments of both dangerous goods and non-dangerous goods are made between suppliers, the Toronto plant, the Peterborough plant, and customer nuclear generating stations. Shipments of prescribed substances are only made to:

- Persons in Canada, holding a valid CNSC Licence to possess such prescribed substances; or
- Persons in Canada, not requiring a valid CNSC Licence by virtue of the *Nuclear Safety and Control Act* and regulations; or
- Persons outside Canada, as approved by an Export Permit and CNSC Export Licence, or combination of CNSC Export Licence and reference to General Export Permit as applicable.

The transportation of dangerous goods in Canada is regulated by Transport Canada through the *Transportation of Dangerous Goods Regulations*. Additional requirements for the transport of Class 7 radioactive materials is regulated by the CNSC through the *Packaging and Transportation of Nuclear Substances Regulations*. In addition, the IAEA has established uniform regulations for all modes of transportation throughout the world. The IAEA has published the *Regulations for the Safe Transport of Radioactive Material* and the CNSC has endorsed these through the *Packaging and Transport of Nuclear Substances Regulations*.

BWXT NEC has an established *Emergency Response Assistance Plan* compliant to Part 7 of the *Transportation of Dangerous Goods Regulations*. It is in place to ensure that timely and effective response protocols are in place with the intent to protect public safety, property, and the environment in the event of an accident involving the transportation of natural or depleted UO_2.

4 OTHER MATTERS OF REGULATORY INTEREST

4.1 Public Information & Disclosure Program

BWXT NEC is committed to connecting with the Peterborough community in a timely, transparent and meaningful way. BWXT NEC recognizes that the most effective way to build and sustain public trust is to maintain environmental excellence while fostering an atmosphere of openness and transparency with the community. The purpose of our Public Information & Disclosure Program is to provide the strategy and methodologies to be employed for public communications, information distribution and feedback, and how these activities will be managed.

BWXT NEC's Public Information and Disclosure Program (PIDP) document has been developed in accordance with CNSC REGDOC-3.2.1, "Public Information and Disclosure."

The objectives of our program are to:

- Improve the level of awareness and understanding among community members about our licensed operations and activities.
- Provide information on the anticipated effects to the environment and on human health and safety, of the licensed activity to the community.
- Foster dialogue with the community to assist our team in determining the information needs and preferred methods for information sharing.
- Build and maintain a relationship of trust with the community.
- Provide meaningful opportunities for the community to discuss and share issues and relay concerns related to our facilities.
- Provide opportunities for community members and other interested parties to visit and tour our facilities.

A Self-Assessment was conducted in October focused on public opinion and feedback. In 2025, post-event and post-tour surveys were issued to new contacts to BWXT NEC's community email list and to those who attended tours. A quarterly review meeting will be conducted to review actions and

feedback from these surveys. Looking ahead to 2026, focus group sessions will be implemented to obtain feedback from community members.

BWXT NEC looks forward to continuing to find ways to improve our program, providing more in-person engagement opportunities, and implementing feedback from community members.

4.1.1 Employee/Internal Communications

BWXT NEC uses a variety of means to engage its approximately 400 employees in Peterborough. The company uses the employee portal (intranet), electronic bulletin boards, email alerts and printed communications to issue company news, executive blogs, and general business updates. Open communication is important to BWXT's leadership team, and employees are encouraged to contact leadership throughout the year with questions.

4.1.2 Government Relations

BWXT NEC works to ensure there is open communication and awareness of operating activities with all levels of government in the Peterborough community. In 2025, BWXT NEC connected with MP Harrison, MPP Smith, and Mayor Leal and Peterborough Council, with offers to meet and tour. In May, MPP Smith visited for a meeting and tour and an additional meeting was held in September. A meeting and tour was held with Mayor Leal and representatives from Economic Development in June. In October, a meeting was held with MP Harrison at her office. BWXT NEC is in the process of coordinating a tour with MP Harrison and Peterborough Council. Throughout the year, BWXT NEC emailed sixteen electronic updates to the MP for Peterborough-Kawartha, MPP for Peterborough, the Mayor, and Peterborough Councillors. More information about the details of these email updates can be found in 4.1.4.3.

4.1.3 Indigenous Relations

BWXT in Canada (which includes BWXT NEC) joined the Canadian Council for Indigenous Business (CCIB) in 2017 and is committed to building and sustaining positive relationships with Indigenous communities. BWXT is participating in the CCIB's Partnership Accreditation in Indigenous Relations (PAIR) certification program and is currently PAIR-Committed. BWXT Canada has a public commitment and policy and an internal Indigenous Relations Committee that meets regularly to review objectives outlined in the PAIR criteria as the company works to find ways to increase Indigenous cultural awareness and strengthen its ties with Indigenous communities. In July 2024, BWXT introduced an Indigenous Relations Roadmap for the company's operations in Canada. The Indigenous Relations Roadmap is a leadership guide to advancing Indigenous Truth and Reconciliation across the business in an aligned and meaningful way. In September 2024 BWXT's Indigenous Relations Roadmap Oversight Committee was established to oversee the implementation of the Indigenous Relations Roadmap. More information about BWXT's Roadmap can be found on BWXT NEC's website.

Throughout 2025, BWXT NEC met virtually with representatives from Curve Lake First Nation. During the meetings Curve Lake First Nation representatives would provide an update on behalf of the community and BWXT NEC would provide an update on behalf of the company. Topics of interest discussed at these meetings include environmental monitoring, community support, future events, operations in Peterborough and Toronto, Indigenous relations progress, and more. In March, BWXT NEC hosted Chief Knott and representatives from Curve Lake First Nation's Consultation Department for a meeting and tour. In May, BWXT NEC hosted Chief Simpson and representatives from Alderville First Nation's Consultation Department for a meeting and tour. Discussions focused on potential collaborative opportunities. We look forward to further discussions in 2026. In August, BWXT NEC held its annual soil sampling campaign and one representative from Curve Lake First

Nation's Consultation Department attended. BWXT NEC representatives attended Curve Lake First Nations Energy Alternate Routes Fair. BWXT NEC sponsored the Métis Nation of Ontario's Annual General Assembly and provided funding to the Métis Nation of Ontario Peterborough & District Wapiti Métis Council. BWXT NEC also sponsored Curve Lake First Nation's Annual Pow Wow and provided a donation to the food bank. BWXT NEC also provided capacity funding for engagement. BWXT NEC hosted a beading workshop for employees with a local Métis woman who was connected through the Métis Nation of Ontario Peterborough & District Wapiti Métis Council.

BWXT NEC looks forward to continuing to engage with and find opportunities to support The Williams Treaties (Alderville, Curve Lake, Hiawatha, Scugog Island, Beausoleil, Georgina Island and Rama) and the Peterborough and District Wapiti Métis Council (once they have resumed).

4.1.4 Community Relations

BWXT NEC is committed to timely and transparent communication with the Peterborough community and works to ensure there is open, two-way communication and awareness of BWXT NEC's operating activities. Throughout 2025, BWXT NEC utilized a variety of communication channels to provide information to neighbours, including electronic email updates (which includes any interested member of the public), fence banners, newsletters, mailers, social media, and targeted advertisements. Community members can sign up to join BWXT NEC's email updates anytime by contacting the company at questions@bwxt.com or by submitting their info by clicking to our online form.

4.1.4.1 Tours & Presentations

BWXT NEC recognizes the importance of building and maintaining relationships with the community in Peterborough. At community events, visitors can sign-up to be added to BWXT NEC's contact list to receive updates throughout the year and to indicate interest in a tour.

Facility tours and presentations help community members better understand our business and provide opportunities for in-person discussion and feedback. To additionally allow community members to see our operations, a virtual tour of the fuel bundle manufacturing is available to the public at nec.bwxt.com.

In 2025, eight facility tours were held (Community Liaison Committee, Prince of Wales Public School Parent Council, Alderville First Nation, Curve Lake First Nation, MPP Smith, Peterborough & Kawarthas Chamber of Commerce, Mayor Leal and Peterborough Economic Development, community members). The community member tour was a new addition in 2025 and was offered to all subscribers of BWXT NEC's Peterborough email list. Ten community members attended the tour. In October, BWXT NEC also attended Curve Lake First Nations Energy Alternate Routes Fair and presented to members at a Rotary Club of Peterborough meeting.

4.1.4.2 Community Events

BWXT NEC hosts and attends community events as they create a platform for the exchange of information between the company and community members. These events help to build positive relationships within the community and demonstrate transparency and openness to discussion.

Senior leaders and department experts attend our community events and provide information about BWXT NEC's operations, safety, licensing, community outreach, and more. At our events, we ensure we have a variety of information materials, visuals, and takeaways for community members to ensure information is readily available. Visitors are encouraged to sign up to join BWXT NEC's email contact list and indicate their interest in a tour.

In 2025, BWXT NEC coordinated a Community Connect Booth at Lansdowne Place for two days in May. Over the course of the two days, company representatives were able to engage with over 115 community members. BWXT NEC also participated in the Living Well Senior Showcase in June and met with over 150 community members. Additionally, BWXT NEC held a Community Connect Information Session in October at the Peterborough facility parking lot. Approximately 25 community members attended the event. These in-person events provided an opportunity to engage with community members, obtain feedback, and educate about our operations. Information signs about safety, regulatory compliance, public information, fuel bundle manufacturing, fuel handling and engineering, careers, and radiation and uranium were displayed at the events, along with printed materials that community members could take home. Senior level management and directors were available to answer questions from community members and guests were encouraged to sign up to join BWXT NEC's email contact list. Additionally, guests could request to be included in the next community tour opportunity. Community members asked questions on the following topics: operations, fuel bundle assembly, fuel handling manufacturing and engineering, environmental monitoring, community engagement, and job opportunities.

An event was also held with Innovation Cluster in September to inform community members about nuclear medicine advancements and innovations at BWXT NEC.

BWXT NEC issued invitations to these events through a multipronged approach using mailers, Facebook advertisements, website news on the home page of nec.bwxt.com, and email updates to BWXT NEC's subscribers.

4.1.4.3 Community Newsletters, Email Updates, Postcard Mailers, and Brochures

Community Newsletters: BWXT NEC distributes community newsletters as a tool to share information with the local Peterborough community about the company's operations, environmental monitoring, CNSC licence, events, and activities in the community. Community newsletters are mailed to neighbours in the surrounding community, posted on BWXT NEC's website for download, shared on social media, and emailed to subscribers. Each newsletter includes contact information and an overview of BWXT NEC's Peterborough operations.

In 2025, two newsletters were shared with the Peterborough community in June and November. The Spring/Summer Newsletter provided an update on BWXT NEC's community engagement with Prince of Wales Public School, volunteer support at the Peterborough Regional Science Fair, information on the 2024 Annual Compliance Report, environmental monitoring data and infographics related to uranium air emissions, progress in BWXT's Indigenous Relations Roadmap, details on honouring May 5 Red Dress Day for Missing and Murdered Indigenous Women, Girls, and Two-Spirit Individuals, new website look announcement, career information, and an overview of contact information and operations. The Spring/Summer Newsletter was mailed to over 5,000 community members, included in an email update, and posted on nec.bwxt.com. The Fall/Winter Newsletter provided an update on BWXT NEC's nuclear medicine event with Innovation Cluster, link to join the community Facebook Group, details about GE Vernova's notice of intent, fundraiser for Peterborough Humane Society, annual drill completion details, soil sampling results, Community Liaison Committee recruitment, and an overview of contact information and operations. The Fall/Winter Newsletter was mailed to over 5,000 community members, included in an email update, and posted on nec.bwxt.com.

Email Updates: BWXT NEC sends regular email updates to subscribers as another tool to share information and engage with the community. Community members can sign up to join BWXT NEC's email updates anytime by contacting the company at questions@bwxt.com or by submitting their info by clicking to our online form. In 2025, sixteen email updates were sent. The following topics were covered: Community engagement and volunteerism, CNSC events and meetings, overview of the PIDP, radiation facts, Indigenous relations, tours and presentations provided, facts, event invitations,

CNSC IEMP results, website updates, newsletters, Facebook Group invitations, soil sampling, drill notice, tour invitation, and a holiday message. The email updates all include an introductory message from one of the members from BWXT's Corporate Affairs team who are responsible for the Public Information & Disclosure Program. Additionally, each email update contains contact information and details about BWXT NEC.

Postcard Mailers: BWXT NEC primarily uses mailed postcards as an additional outreach method to invite community members to participate in an event or share information on a specific topic. In 2025, two postcard mailers were sent. The first postcard was mailed in April to over 5,000 community members to advertise for BWXT NEC's Community Connect Booth at Lansdowne Place. The second postcard was mailed in September to over 5,000 community members to provide notice of an upcoming drill.

Information Brochures: BWXT NEC maintains public information brochures. These brochures are updated annually when new information is available from the Annual Compliance Report. These brochures are available in during events and are also posted on nec.bwxt.com. Brochures are also available at the guardhouse along Monaghan Road.

4.1.4.4 Community Volunteerism and Investment

BWXT NEC, believes in fostering healthy and vibrant communities. Through our initiative, BWXT Volunteer Strong, our employees have the opportunity to help build stronger communities where they live and work by volunteering their time and expertise to local causes.

In 2025, employees held a fundraiser for the Youth Emergency Shelter, participated as judges at the Peterborough Regional Science Fair, participated in Peterborough's Dragon Boat Festival, participated in a career day at Prince of Wales Public School, held a community clean up, participated in a student career coaching event at Holy Cross Secondary School, supported the Peterborough Folk Festival with event setup, repainted some of the playground lines at Prince of Wales Public School, held a fundraiser for the Peterborough Humane Society, participated in a Junior Achievement Day, held a fundraiser to purchase holiday gifts for local seniors, provided funding to Peterborough Regional Health Centre (PRHC) through the charitable parking program, and collected gift donations to support 76 children in the community through an annual Angel Tree collection in support of Kinark Child and Family Services.

In addition to providing volunteer hours, BWXT NEC supports a range of community-based groups/initiatives that help improve community life through charitable giving. In 2025, BWXT NEC provided funding to Otonabee Valley Public School to support their breakfast program, sponsored the Peterborough Regional Science Fair and provided funding for student awards, provided a donation to Prince of Wales Public School to purchase STEM books and resources for their library, provided three bursary awards for students in the School of Trades and Technology at Fleming College, three bursary awards to Trent University in the Computer Science program, and three bursary awards to Ontario Tech University, sponsored PRHC's Dragon Boat Festival, sponsored a fish at the Ontario Federation of Anglers and Hunters Fishing Derby, provided a donation to the Rotary Club of Peterborough's Rotary Environmental Innovators Fund, provided a donation to Make-A-Wish, sponsored a Junior Achievement student day, provided a donation to Peterborough Folk Festival, supported Kenner Collegiate Vocational Institute and Adam Scott Collegiate Vocational Institute through student awards in STEM, and provided a donation to the Rotary Club of Peterborough's Rotary Accessible Playground Project at Riverview Park and Zoo.

4.1.5 Peterborough Community Liaison Committee (CLC)

The Peterborough CLC was established in 2020 and meets three to four times per year in the evening. The CLC is a forum for the exchange of information between the community and BWXT

NEC and allows members to bring forward questions, discuss concerns and identify opportunities to improve community relations. CLC members provide input on topics to highlight in newsletters and communications, event planning, website updates, community initiatives and more. Their input is valuable in guiding communications efforts with community members. BWXT NEC ensures that representatives from senior leadership as well as subject matter experts attend each regular meeting.

In 2025, the CLC had a membership of twelve members (including representatives from Peterborough Public Health, Fleming College, Trent University, Prince of Wales Public School, and Peterborough & The Kawarthas Home Builders Association). During the year, CLC members provided feedback on community support and engagement, drill notifications to community members, website content, event opportunities, guest speakers, community surveying, and Indigenous engagement.

BWXT NEC held a new member orientation and tour on February 18 in person. A virtual make-up orientation session was held on February 24 for members who could not attend the first session. BWXT NEC subsequently met with the CLC on April 8 (in-person), June 10 (virtual), and October 14 (in person) for regular meetings. A year-end evaluation meeting was held on November 18 (virtual). Meeting records are posted on nec.bwxt.com. Representatives from Nuclear Waste Management Organization attended the June meeting to provide an overview on long-term storage plans for Canada's nuclear waste. Representatives from Creative Fire attended the October meeting virtually to discuss BWXT's Indigenous Relations Roadmap. A hybrid approach to meetings was taken in 2025 to address feedback from 2023 members about availability in person. This change was encouraging as almost all members attended the CLC meetings in 2025.

Topics discussed during the 2025 meetings include: community giving and volunteerism, events and presentations, tours, emergency response and drill notifications, CANDU overview, communication tools and outreach, annual compliance report review, guest speakers, community surveying, GE Vernova's notice of intent, soil sampling, CNSC IEMP and mid-term review meeting, Indigenous relations, and website review session.

BWXT NEC launched a recruitment campaign in the fall of 2025 to attract new members. Letters requesting members were sent to the following organizations: GreenUP, Peterborough Fire Services, Peterborough Police Services, Otonabee Region Conservation Authority, Peterborough and the Kawarthas Association of Realtors, and Peterborough Regional Health Centre. Three applications were received, and one was accepted upon review.

4.1.6 Website

BWXT NEC has a dedicated public information website, nec.bwxt.com. The website provides information about the company's operations, safety and compliance, environmental monitoring, Public Disclosure Protocol, community outreach, Indigenous engagement, and events/activities that can be accessed by members of the public.

In 2025, there were 18,787 sessions from 16,117 users. Top pages visited were: Home page (39%), Emergency Response (11%), and About Us (4%).

In 2025, BWXT's Brand and Marketing team completed an upgrade to the company websites. The nec.bwxt.com site was part of this upgrade, and the overall website was re-branded and updated to a new platform. The website remained similar in navigation and information and provided an opportunity to leverage feedback on the new content. BWXT NEC held a website feedback session with CLC members where each member was asked to review the new webpages and content and provide suggestions for improvement. CLC members noted that their overall impression of the website and quality of content was good and highlighted that the website was easy to navigate. Each

member also rated website subpages and most were very effective. One CLC member noted that there should be a page dedicated to radiation and nuclear power. It was explained to the member that a dedicated page exists, but that it can be reviewed for improvements. One member shared there should be more information about nuclear medicine, projects happening in the non-licensed part of the Peterborough site, and student engagement. Overall, the CLC was impressed and noted there was a lot of great information on the website.

Over the course of 2025, new information was regularly updated on the website. The following represents some of the updates that were posted:

- Document summaries and environmental information
- Emergency response information and drill details
- Frequently asked questions
- Public Disclosures
- Community Liaison Committee meeting minutes, recruitment information
- Indigenous Relations Roadmap
- Community newsletters
- Community event details
- Annual Compliance Report information
- Notice of CNSC's IEMP and annual public meeting
- Community involvement and support

4.1.7 Community Surveying

BWXT NEC conducts community surveys to obtain feedback from community members, including strengths and key areas for improvement. BWXT NEC's first survey was conducted in 2018 by Ipsos, an independent research firm. This survey provided BWXT NEC with baseline community feedback shortly after the acquisition of the company in December 2016. Subsequent surveys were conducted in 2020, 2022 and 2024 and survey results were shared publicly through BWXT NEC's communications channels. Copies of survey results are available on BWXT NEC's website.

The objectives of surveys are as follows:

- Gain awareness, knowledge and familiarity of BWXT operations in the local community.
- Gauge impressions of BWXT as an organization, including attention to safety, community engagement, job creation, and more.
- Identify recall and awareness of BWXT communications in the community, if these have been made available to residents.

In 2025, BWXT NEC discussed the topic of community surveying with CLC members to review previous survey results, obtain feedback, and determine the most effective path forward. It was suggested that BWXT NEC conduct alternate options to a survey. The idea of a focus group was discussed and CLC members noted there was potential connections locally to conduct this type of engagement. BWXT NEC is in the process of planning multiple focus groups with an independent research firm in early 2026. Details from these engagement sessions will be shared publicly when available.

4.1.8 Public Inquiries & Opinion

BWXT NEC utilizes multiple avenues for communication with members of the public. BWXT NEC has a dedicated website (nec.bwxt.com), email (questions@bwxt.com) and toll-free telephone number (1.855.696.9588). These contact details appear on BWXT NEC's website and on all

information products. The phone and email are available 24/7 and monitored daily. All public inquiries are responded to in a timely manner and logged and actions are tracked to completion.

Feedback and questions from the public are solicited to understand current public opinion. Feedback is collected through a variety of methods, such as through meetings, tours, phone calls, emails, social media comments, public events, volunteer initiatives, CLC members, employees and occasionally opinions are printed in local media and members of the public are interviewed in local stories. We utilize feedback to measure the effectiveness of our program.

In 2025, BWXT NEC received 1,047 emails and 227 calls, the majority of which were spam, questions for finance or purchasing, job seekers or agencies seeking employment verifications. Three emails were received from community members. One was a local robotics team requesting information about corporate giving and two were requests for a tour. Three phone calls were received. One was a question whether BWXT NEC sells HEPA filters, one was a concern about vibration in their home which they thought was from our facility, and one was a question about alarms and sounds that may occur during a drill.

All emails and calls to the information line were appropriately handled and addressed. We continue to encourage community members to use these channels to contact our team with questions, comments, and concerns.

4.1.9 Earned Media

BWXT NEC aims to respond to media inquiries in a timely manner provides the media with access to subject matter experts and facility tours when appropriate. Media events, press conferences and news releases are executed when required, and news releases are posted to the BWXT NEC website. Print, broadcast and online (digital/social media) media coverage is closely monitored for stories about BWXT NEC on an ongoing basis. The purpose is to stay cognizant of any information about the company in near real time while measuring the amount and nature of media coverage. This permits BWXT NEC to be prepared to respond to any inquiries either internally or externally and helps BWXT NEC ascertain the prevailing attitudes of the public towards the operations.

In 2025, BWXT NEC was mentioned in two news articles, one magazine and featured on local television twice. Two were focused on the positive impact of our operations in Ontario in nuclear power and nuclear medicine. One was on the fire alarm in September, one was on the employee donation to PRHC, and one was a reference about the BWXT NEC buildings in relation to GE Vernova’s intent to demolish part of the property.

4.1.10 Social Media

In 2020, BWXT NEC launched dedicated Facebook and X social media channels to better engage with community members. Social media channels help BWXT NEC share information about activities with the public in a timely way. In 2024, BWXT’s corporate division consolidated BWXT NEC’s Facebook and X accounts to be inclusive of all BWXT’s operations in Canada and provide communities with a greater understanding of the business. To pivot with this change, BWXT NEC began utilizing targeted social media advertising to share information with the community around the facility. In 2025, the Canada accounts were consolidated into BWXT’s corporate account. To continue to pivot, BWXT NEC launched a dedicated Facebook Group in 2025. The purpose of this group is to share news with community members and provide an additional channel for two-way communication and feedback. BWXT NEC continues to work to expand the audience of this Facebook Group and encourage community members to join.

Targeted advertisements have become a reliable, impactful tool for BWXT NEC. Through these advertisements, BWXT NEC can reach specific audiences and locations and track views, comments,

link clicks and other engagements. The majority of the advertisements have comments and feedback which are logged and dispositioned by BWXT NEC. On average, BWXT NEC's targeted advertisements in Peterborough reach 17,850 community members with 180 link clicks – a much larger distribution compared to traditional paper mail. During situations where paper mail is not available (i.e., Canada Post strike), targeted advertisements are increased to reach a larger audience.

In 2025, seven targeted Facebook advertisements were used to share information about the new Facebook Group, two community events, soil sampling, annual drill, Community Liaison Committee, and one was used to encourage community members to subscribe to BWXT NEC's email updates.

4.1.11 Public Disclosure Protocol

BWXT NEC has a Public Disclosure Protocol in place that sets guidelines for providing timely information to interested members of the public and other stakeholders. This protocol and all public disclosures issued by BWXT NEC can be found on the company website. This protocol's objectives are to provide information on licensed activities to persons living near the site, foster public awareness and provide a forum for community members to discuss issues and concerns related to the licensed facilities. The Public Disclosure Protocol is readily available for download as a PDF on BWXT NEC's website.

In 2025, there were three public disclosures made:

- April 9, 2025 – Water leaking in a floor trench was discovered. The water source was from the beryllium water treatment system and was caused by a failed sump pump at the effluent treatment system discharge. This water was intended for discharge to the sanitary sewer and was instead overflowing into the floor trench and seeping through concrete into the ground under Building 21. A sample was taken immediately following the release and confirmed beryllium concentration in the water was well below internal control level and international drinking water standards. The sump pump was inspected and repaired, and all relevant authorities were informed.
- June 3, 2025 – Notice to community members that Peterborough Police Services was visiting the facility for facility training and tours.
- September 25, 2025 – Fire alarm was activated in Building 21. All employees in the affected building were safely evacuated and were accounted for. Peterborough Fire Services examined the situation and confirmed there was no gas leak, no fire, and no release of radioactive materials. Following Peterborough Fire Services assessment, BWXT's Emergency Organization team reviewed the facility and concluded the site was safe for employees to return to work. Based on the assessment by Peterborough Fire Services and the site team, there was no risk to employees, the community or the environment.

4.2 Cost Recovery

BWXT NEC is current on its cost recovery payments to the CNSC.

4.3 Financial Guarantees

The Preliminary Decommissioning Plan (PDP) and associated decommissioning cost estimates are in place in accordance with CNSC regulatory requirements and applicable standards. The 2023 Peterborough and Toronto facility PDPs were reviewed against the criteria set in CNSC REGDOC-2.11.2, *Decommissioning* (January 2021), CNSC REGDOC-3.3.1, *Financial Guarantees for the Decommissioning of Nuclear Facilities and Termination of Licensed Activities* (January 2021), and

CSA Standard N294-19, *Decommissioning of Facilities Containing Nuclear Substances* (November 2019). The PDP strategy and end-state objective of decommissioning is to release the site from regulatory control for industrial use or demolition of the structures.

In November of 2022, BWXT NEC submitted an updated PDP to CNSC staff, which was revised in August of 2023 and was accepted by CNSC staff in October of 2023. In 2024, the CNSC Commission accepted the revised financial guarantee amount, and BWXT put in place the required financial guarantee instruments to reflect these accepted amounts. The financial instruments remain valid in the format approved by the CNSC. The issuers of the financial guarantee instruments remain in good standing. The financial rating of the financial guarantee issuers were provided to the CNSC in March of 2025.

4.4 Improvement Plans and Future Outlook

BWXT NEC remains committed to continuously improve its EHS programs to improve efficiency and minimize risk to employees, the public and the environment. Facility operations are projected to be lower in 2026 due to the downtime for refurbishment of Pickering OPG's nuclear reactors.

5 CONCLUDING REMARKS

BWXT NEC 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 NEC 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 Action Levels, and regulatory limits. Environmental protection programs are well implemented. Facility emission results were very low and below Action Levels, and regulatory limits. Annual releases to the air and water were both a very small fraction of regulatory limits. Public dose was estimated to be 5.7 µSv.

All production and possession limits were respected. Transportation of dangerous goods was conducted 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 NEC has successfully met the requirements of the *Nuclear Safety and Control Act*, regulations and CNSC Class IB Nuclear Fuel Facility Licence requirements.