

Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
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Submitted via E-mail: [interventions@cnscccsn.gc.ca](mailto:interventions@cnscccsn.gc.ca)

March 20, 2007

**Re: SRB Technologies Canada Inc. - Application for the Amendment of its Nuclear Substance Processing Facility Possession Licence - Ref. 2007-H-08**

Dear Commission Secretariat,

The citizen-based Ottawa Riverkeeper is the voice that works to protect and enhance the ecological health and integrity of the Ottawa River system. Through expert, independent action Ottawa Riverkeeper encourages responsible decision-making, public education and participation, and compliance with existing protection regulations throughout the watershed.

Ottawa Riverkeeper has outstanding concerns regarding SRBT's application to amend its Nuclear Substance Processing Facility Possession Licence. We also have serious concerns about the inability of the public to adequately assess this application given the lack of documentation and inadequate time frames for review.

Today is March 20th and although I have requested copies of the hearing documents for the amendment hearing, I have received none. The CNSC has given the public a March 28th, 2007 deadline for presenting written comments on the SRBT application. This time frame is unacceptable and cannot be considered appropriate for public input. Organizations such as Ottawa Riverkeeper rely on review and comments from independent experts in the field and this quick turn around time does not allow us to consult with our science experts and do our own research. The message you are conveying to the public is not good, essentially your timelines tell us that public input is irrelevant for your decision.

Given that we do not have access to SRBT's application it is challenging to comment on the requested amendment. We do not know what products they are planning to make and what alternatives exist to these products. However, we do know that tritium-filled tubes are hazardous and create a difficult and expensive disposal problem. We also know that in the past SRBT has not shown due diligence with respect to protecting their surrounding environment.

With the information presented to date it is clear that SRBT has significantly polluted the soil, air and water around them. Ottawa Riverkeeper sees an immediate need for a better understanding of the groundwater contamination problem. Tritium has been



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accumulating in the groundwater at a rate of 2,300,000 Bq/L with every rainfall. This is a serious threat to local residential well users as well as the Ottawa River.

In this regard, Ottawa Riverkeeper believes that any operation of the facility should not be carried out until the groundwater contamination has been assessed to the satisfaction of the Commission and the public.

Ottawa Riverkeeper is also concerned that SRBT does not yet have an approved decommissioning plan to deal with the current contamination issues and no financial guarantee for decommissioning or cleaning up their accumulated mess. Given that the Commission has stated "*the licensee shall have in place, by no later than July 31, 2007, the financial guarantee equivalent to the cost of safe shutdown state of the facility and the licensee shall have the full amount of the financial guarantee in place no later than May 31, 2008*", Ottawa Riverkeeper recommends that no applications from SRBT be considered until May 31, 2008 when SRBT has the financial guarantee in place. This act will give the public some confidence that SRBT is acting as a responsible corporate citizen.

As Ottawa Riverkeeper I urge the CNSC to take a precautionary approach to licensing and regulating SRBT's Pembroke facility and to include the public in decision-making around this contentious facility.

Sincerely,

Meredith Brown  
Riverkeeper and Executive Director  
Ottawa Riverkeeper / Sentinelle Outaouais

