

1 **General Electric Canada Inc.:**
2 **Application for the renewal of the**
3 **Operating licence for the Toronto**
4 **nuclear fuel facility**

5
6 **05-H24.1B**

7 **Oral presentation by**
8 **General Electric Canada Inc.**

9 **MR. MASON:** For the record, Peter Mason.

10 Thank you, Madam Chair. Good morning,
11 Commissioners. I would like to introduce to you my
12 colleagues that are here with me this morning. On my
13 right-hand side is Mr. Henry Hann who is the Manager of
14 the Environmental Health and Safety Department of our
15 business. On my left-hand side is Mr. Paul Desiri who is
16 our Regulatory Compliance Leader, and on my far left is
17 Ms. Clara Greco, who is legal counsel for GE Canada.

18 I guess the purpose of us being here is for
19 the re-licensing of GE's Class 1B facilities, and I would
20 like to start by presenting information for our Toronto
21 facility and, as Madam Chair pointed out, some of it is
22 common to our Application for the Peterborough facility,
23 and I have specific data for the Peterborough facility
24 that I will present later.

25 One of the questions from our last hearing

1 was an update in terms of the information for the second
2 quarter of this year, and you can see on this slide that
3 the performance has either been improved or remains stable
4 during the course of the second quarter. I won't go
5 through each one, but I think you can see for yourself
6 that it just shows a consistent performance that we had
7 with the facility.

8 The other item which we were unable to
9 answer adequately at the last meeting was with regard to
10 our emergency response for the fire in the Toronto
11 facility, and I believe that in our CMD we have given full
12 details of the response plan and, in particular, the
13 capture of water and the cleanup after that.

14 Just to elaborate on that, the plan relies
15 on the basement as a catchment area for the water from any
16 fire, and the capacity of the basement is 550,000 litres
17 of water.

18 The Fire Code requires that our sprinkler
19 system be able to deliver water for at least 60 minutes.
20 And you will see in the information our calculation that
21 in a typical localized fire, there may be as many as six
22 sprinkler heads delivering water to the area at a rate of
23 approximately 30,000 litres per hour.

24 Therefore, the basement catchment and the
25 water treatment facility are more than adequate to cope

1 with that, and that has been confirmed by our consultant
2 as well. Full details of that information are in the CMD.

3 The next item was to respond to some
4 concerns with our quality program documentation and I
5 think, as I pointed out at that time, it really was for
6 clarification of our program in terms of the descriptions.

7 We have since worked with members of the
8 CNSC to clarify those descriptions, and I believe that
9 that is now considered adequate.

10 The last item which, when we went away, we
11 gave a great deal of thought to this question because we
12 recognize that, as the Commissioner pointed out at our
13 last hearing, was that it's not just about complying with
14 minimum standards, but it's really for a company like
15 General Electric to establish best practice, and that is
16 indeed our intent, the entire General Electric company, is
17 really to drive best practice and be best in class in
18 whatever we do.

19 It is certainly our thinking that the
20 General Electric Company's environmental health and safety
21 systems are amongst the best in the world. The rigour
22 with which that is applied throughout the company, we
23 believe, is best in class. But nonetheless, there is
24 always room for improvement, and I think that was the
25 point the Commissioner was trying to make.

1 We would welcome the opportunity -- in
2 fact, we would request the opportunity for dialogue with
3 the CNSC to look at ways that we can in fact promote best
4 practice within the industry. I would certainly commit on
5 behalf of the General Electric Company that we would
6 strive to do that as a responsible member of our industry.

7 That is all I have to present, Madam Chair,
8 and I hope the information we've provided is satisfactory.

9 In conclusion, I would request for the re-
10 licensing of our Toronto facility for the period of five
11 years.

12 Then, I think perhaps it's an appropriate
13 time for us to review the commercially-sensitive
14 information unless there is some questions.

15 Thank you.

16 **THE CHAIRPERSON:** What we will do is we
17 will come back to questions afterwards.

18 Mr. Mason, if you concur?

19 So we are going to move in camera, as we
20 discussed earlier, and we have designated representatives
21 from GE and CNSC staff who will be joining us in the back
22 room right now. We expect that this will be about 10
23 minutes or so. So we'll see. But just for the people in
24 the audience who are not included we expect it could be 10
25 minutes or more.

1 So if those members could go in the back
2 and we'll join you there?

3 --- Upon recessing at 8:42 a.m.

4 --- Upon resuming at 9:05 a.m.

5 **THE CHAIRPERSON:** I'd like now to turn to
6 the presentation by CNSC outlining CMD document 05-H24.B
7 and I will turn to Mr. Henry Rabski, the Director of
8 Processing and Research Facilities Division.

9 Mr. Rabski, you may proceed, sir.

10 **05-H24.B**

11 **Oral presentation by**

12 **CNSC Staff**

13 **MR. RABSKI:** Good morning, Madam Chair,
14 members of the Commission.

15 For the record, my name is Henry Rabski,
16 Director of the Processing and Research Facilities
17 Division.

18 With me this morning I have Mr. David
19 Werry, Project Officer in the Processing and Research
20 Facilities Division; as well, Dr. Patsy Thompson, Acting
21 Director of Geosciences and Environmental Compliance
22 Division, and the rest of our licensing team for this
23 facility.

24 CNSC staff has reviewed the operation of
25 General Electric's Toronto facility and the Application

1 from GE Toronto to renew the facility's operating licence.

2 I will turn the presentation over to Mr.
3 Werry to continue with supplemental information requested
4 by the Commission on Hearing Day One.

5 **MR. WERRY:** Good morning, Madam Chair,
6 members of the Commission. For the record, my name is
7 David Werry.

8 CNSC staff's assessment of the licence
9 renewal application is documented in CMD 05-H24 Hearing
10 Day One information on September 24th, 2005 and supported
11 a recommendation that the Commission renew the proposed
12 processing facility licence for a period of five years.
13 Today, staff will present supplemental information to the
14 Commission addressing the issues that were raised on
15 Hearing Day One.

16 Staff's supplemental information
17 presentation addresses the following four areas: licence
18 production limits, radiation protection, fire protection
19 and quality management.

20 This Commission member document presents no
21 changes in CNSC staff's conclusions or recommendations to
22 reissue a five year licence to the GE Toronto facility.

23 General Electric will be referred to as GE
24 or GE Toronto for this presentation.

25 Licence production limits: GE is limited

1 to producing 150 tonnes of uranium as pellets in any
2 calendar month. In addition, GE will limit the storage of
3 nuclear material onsite so that the boundary public
4 walkways surrounding the fence line of the licensed areas
5 are kept at background radiation levels.

6 Additional data: The quarter two 2005
7 updated data is shown in the CMD as requested. It shows
8 the same order of magnitude as the quarter one data and
9 does not change the general trends as that presented for
10 the previous four years. Quarter three 2005 data was not
11 available when this CMD was written.

12 CNSC staff has reviewed the GE Radiation
13 Protection Program and discussed the review with the
14 licensee in early November 2005. Staff's evaluation of
15 the program remains a "B".

16 Firewater treatment and fire protection:
17 Firewater used in an event will collect in the basement of
18 the Toronto facility and be treated prior to release.

19 Quality management: The revised GE Quality
20 Management Program has been received by the CNSC. CNSC
21 plans to review the Tier 2 procedures prior to scheduling
22 and conducting any onsite audit so that the most current
23 information is verified in the audit. CNSC staff will
24 report on a quality audit at an interim licence report.

25 In preparing to sum up, staff will repeat

1 the conclusions from Hearing Day One. There are several
2 indicators that the facility has been operated safely
3 during the licensing period. The radiation doses to the
4 workers and to the public along with the radioactive
5 emissions from the environment are well below the
6 regulatory limits and there have been no safety-
7 significant events reported during the licence term.

8 CNSC staff concludes that the risk to the
9 public, environment and the workers over the current
10 licence term has been low and the overall performance of
11 GE meets requirements.

12 General Electric has requested a five year
13 licence period with the renewal of this licence. Based on
14 the information that has been outlined in the CMD 05-H24
15 and CMD 05-H24.B CNSC staff is recommending a five year
16 licence period. CNSC staff proposes that an interim
17 report be provided to the Commission midway through the
18 licence period.

19 CNSC staff concludes that GE is qualified
20 to carryon the licensed activity and that the proposed
21 licence will authorize and GE has made adequate provisions
22 to protect the public, environment, health and safety of
23 the workers, security and international obligations, and
24 CNSC staff also concludes that GE's overall performance is
25 meeting regulatory requirements.

1 Finally, CNSC staff recommends to the
2 Commission that the Commission accept CNSC staff's
3 assessment that GE is qualified to carryon the activities
4 that the licence will authorize and will make adequate
5 provision to carryon the activities; accept CNSC staff's
6 assessment that an environmental assessment pursuant to
7 the *Canadian Environmental Assessment Act* is not required
8 for the renewal of the licence, and to approve the renewal
9 of the operating licence for a period of five years valid
10 to December 31st, 2010.

11 Staff also recommends an interim review of
12 the licence performance.

13 This concludes staff's presentation.

14 **MR. RABSKI:** Madam Chair, staff is now
15 available to respond to questions.

16 **THE CHAIRPERSON:** Thank you very much.

17 The floor is now open for questions to
18 either the licensee or to the Commission staff.

19 Dr. Dosman, would you like to start?

20 **MEMBER DOSMAN:** Thank you, Madam Chair.

21 On Day One there was some discussion of
22 quality management and the licensee has made reference to
23 progress in that area. I'd just like to ask CNSC staff,
24 the documentation indicates that GE submitted the revised
25 quality management manual and that the second tier quality

1 procedures have yet to be submitted and reviewed by CNSC
2 staff. I'm just wondering whether we might have a little
3 more detail on the second tier procedures that are yet to
4 be submitted. I note that CNSC staff expresses confidence
5 that the full implementation will be completed prior to
6 the licence mid-term. I would appreciate more detail on
7 those two points.

8 **MR. RABSKI:** Henry Rabski for the record.

9 I would ask Adriana Nicic to respond to
10 your question.

11 **MS. NICIC:** Adriana Nicic for the record.

12 The purpose of a quality management system
13 it's really to provide guidance, how the work is going to
14 be performed for a part of the process for certain
15 activities.

16 With the situation with GE at this point in
17 time, we have been back and forth with the comments
18 regarding the first year, which is a quality manual, and
19 for the second year of the procedure these are really a
20 logical continuation, because the information from the
21 quality manual from the first year has to be fixed in time
22 in order to cascade them down in the second tier, so in
23 order to be sure that they are addressed in a systematic,
24 correct, precise way.

25 So this is the next step that we are going

1 to do to conduct a review, an assessment of the second
2 level tier procedure of the quality manual in preparation
3 for an audit. And during the audit we are also going to
4 look at the third tier, which are the working instructions
5 which really define how the work is executed.

6 **MEMBER DOSMAN:** Madam Chair, may I ask CNSC
7 staff if -- I take it that there is a level of confidence
8 that this process will be completed prior to the midterm
9 evaluation or report?

10 **MS. NICIC:** Based on our interaction and
11 the response from GE with respect in the ways that they
12 are addressing CNSC staff comments to the first tier of
13 the quality program, we are expecting that we are going to
14 continue in the same way with the next tier.

15 Also, we recognize that GE has implemented,
16 at a corporate level, the element of the Quality Assurance
17 Program and we recognize that there are some differences
18 between CNSC requirements and the program that GE is
19 implementing. But in essence, the elements and the
20 principles of quality management are common to this
21 program.

22 So there are no safety significant
23 discrepancies, at this point in time, between the nature
24 of the programs, and we are confident that they are going
25 to continue and to address CNSC requirements in the lower

1 level procedure and, of course, in the implementation,
2 because this is the most important part. This is why we
3 are writing a quality program in order to be able to
4 conduct our work in a precise way.

5 **MEMBER DOSMAN:** Madam Chair, if I might ask
6 GE?

7 There was some discussion on Day One and
8 indeed GE did present the details of GE's Quality
9 Management Program at that time, and indeed in your
10 presentation today you expressed confidence in aligning
11 the details of GE's Quality Management Program in sync
12 with requirements, expectations of CNSC.

13 I'm just wondering whether you had any
14 further comments on how this process is coming and whether
15 GE has confidence that it will be completed by the midterm
16 report as indicated in the CNSC document?

17 **MR. MASON:** Peter Mason, for the record.

18 We are confident that our quality program
19 can be adapted to CNSC requirements. We are certainly
20 confident in the execution of our quality program, and I'm
21 quite confident that we can complete it before the midterm
22 evaluation.

23 I would also defer to my colleague, Mr.
24 Paul Desiri, to comment as well.

25 **MR. DESIRI:** For the record, Paul Desiri.

1 I would just like to add that the Tier 2
2 and Tier 3 procedures are complete at this point. What is
3 left to be done is for them to be reviewed by the CNSC.
4 My understanding, in talking with the licensing officer,
5 is that they are planning an audit soon. I'm not sure of
6 the timeframe but certainly within the next year or so.

7 Following a site review, if there are
8 changes to make to the Tier 2 or Tier 3 procedures, we are
9 confident we could make those changes before the midterm
10 report.

11 **MEMBER DOSMAN:** Thank you.

12 Madam Chair, I also noted in the
13 presentation by GE the reply to the discussion of Day One
14 on the whole issue of safety culture and the leadership
15 that a company such as GE may play in safety culture and,
16 if you like, seeking the "A" report cards, and I did
17 appreciate that discussion. I don't know if there is any
18 further comment, Madam Chair, that GE may wish to make on
19 that issue.

20 **THE CHAIRPERSON:** Before we go, I'd just
21 like to make a comment about this "B" and "A" material,
22 because I really think that I've had some experiences with
23 this lately in terms of boards and can query about this.

24 "B" is satisfactory to the CNSC. It really
25 has to be clear that there is no requirement for a company

1 to go from "B" to "A" and any questions by the Commission
2 members should not be construed as saying that there has
3 to be other than that. The comments by the Commission is
4 that the company should have -- a good company has
5 standards that are above the regulatory limits. That's
6 the real issue.

7 You know, I guess I'm just concerned that
8 sometimes -- and you mentioned this, and I was going to
9 mention it later, but I want to make it clear here -- is
10 that the staff of the Commission are not going to be
11 advisers to companies as to "A" levels particularly. We
12 believe that the company should strive towards "A" and
13 there will be discussion at various points of time as to
14 the lining up of these two issues, but we could burn all
15 our staff's time basically advising companies as to how
16 they would reach "A" on here, "A" on there, and whatever,
17 and that's not what the staff are for. So I think it's
18 really important.

19 My discussion with various kinds of boards
20 lately has been that the Board itself should decide what
21 are the critical factors of performance that are important
22 to that facility and to the Board, and I think this is a
23 heck of a good discussion that happens with various types
24 of operations -- and then driving towards that, at which
25 point there can be discussions with the staff. But I've

1 almost found this tendency to say, "Okay. Staff, tell us
2 what the "A"s are, which requires a lot of work, and then
3 we meet and then we can argue about it going forward".

4 So I caution the Commission members, and I
5 caution the industry, and I caution the staff in terms of
6 talking about your responsibility for this. "B"s are
7 satisfactory and we're pleased when a company receives
8 "B"s. We are very unhappy when they don't receive "B"s.
9 But this is a discussion that should really happen, as you
10 say, within the quality discussion of it.

11 As Dr. Dosman has said, it's important that
12 the companies seek excellence, and we're very pleased with
13 that and we continually do that but we don't require that
14 you move towards "A".

15 So with that addition to what Dr. Dosman
16 said I'll just turn back to the licensee.

17 **MR. MASON:** Peter Mason, for the record.

18 Well, I think we have no further comment.

19 **THE CHAIRPERSON:** Mr. Graham.

20 **MEMBER GRAHAM:** I just have one question.

21 It's with regard to the dose levels, and for
22 clarification.

23 The dose levels that are given both by CNSC
24 staff and by the licensed Applicant, if you take quarter
25 one and quarter two in 2005, do you add those together?

1 I'll go Table 3. I'll just look at Table 3
2 which is regards to skin dose. The 2004 average skin dose
3 17.9; 2005 quarter one, 6.2; quarter two, 5.1. You add
4 those two together, 6.2 and 5.1; is that the way you would
5 calculate that is for the half year? And that's to GE.

6 **MR. DESIRI:** For the record, Paul Desiri.

7 In the Toronto facility -- actually,
8 there's a difference between the Toronto facility and
9 Peterborough facility that I'd like to mention.

10 For the Toronto facility they are the doses
11 received in that quarter. So if you wanted to get year-
12 to-date for the two quarters you would have to add them
13 up.

14 In the Peterborough facility it's
15 different. The quarter two value reported is actually
16 year-to-date.

17 **MEMBER GRAHAM:** Okay. So if you take, just
18 as an example, skin dose, Table 3; if you take 6.2 and 5.1
19 that would be 11.3, and if you said the trend remained the
20 same for the year you would be over 22. So you're more or
21 less trending upward a little bit, and all of them seem to
22 be trending upward.

23 Urinalysis results 4, 4 -- that is 8 -- and
24 it was 6 the year before. That is 8, and if you took the
25 next two quarters, if they remained the same, that would

1 16.

2 Is there a trend upwards or not, or am I
3 reading it wrong?

4 **MR. DESIRI:** For the record, Paul Desirri.

5 Starting with what is reported in our
6 presentation for trends, we talk about external dose. So
7 we actually don't have skin dose covered as an item on our
8 presentation.

9 But I will add that for skin doses, if you
10 multiply that by two -- that is, of course, higher than
11 17.9. So you could say that there is an upward trend in
12 skin doses.

13 The reason that we picked external dose is
14 because it has more of an importance in terms of ALARA in
15 reducing doses, because it is a stochastic-based injury,
16 as opposed to deterministic.

17 In other words, for skin dose it is a
18 threshold type of effect. Providing you are well below
19 500 millisieverts there should not be any effect, as
20 opposed to external dose, where risk is assumed to be
21 proportional to dose. So even small doses are considered
22 to be a risk.

23 For urinalysis I should add that what I
24 said about skin doses does not apply here. Four
25 micrograms per litre is the maximum concentration in that

1 quarter.

2 So for second quarter, is was also four.
3 So you would not add those two together -- and I apologize
4 for that.

5 **MEMBER GRAHAM:** Okay. My question to CNSC
6 staff, if you look at this in a quick glance, as
7 laypersons, there is a small trend upwards. It is not
8 trending up to where the action levels are or anything
9 else, but it is trending upwards.

10 How will you monitor that on a -- you get
11 these reports quarterly and you monitor these. When does
12 it become a significant development? When it surpasses
13 the action levels or when it reaches a certain other
14 level, 50 per cent of the action level or so on? Could
15 you just comment on that?

16 **MR. WERRY:** David Werry, for the record.
17 I look at the order of magnitude of the
18 trend.

19 I would also like to clarify one other
20 small point in quarter four. Quarter four typically has a
21 lower number coming through and that is because the
22 operation shuts down for the Christmas period. So you add
23 that factor and you really don't just double what quarter
24 one and quarter two are.

25 So I look at the order of magnitude, how

1 much larger, if there is a trend, and then make a
2 decision, and I typically -- we just would sit down with
3 the licensee and look at the data and ask to see this
4 specific data.

5 **MEMBER GRAHAM:** And that is done on a
6 quarterly basis and then on a cumulative basis for the
7 whole year, is it?

8 **MR. WERRY:** Yes. David Werry, for the
9 record.

10 **THE CHAIRPERSON:** Dr. McDill?

11 **MEMBER McDILL:** Thank you.

12 I wonder if I could have a clarification of
13 GE's slide 2 of 7 that was presented earlier?

14 Thank you. In the bottom right-hand corner
15 it says that the "discharge is unchanged but much, much
16 less than 2004."

17 So is it much, much less than 2004, or is
18 it unchanged? What is the "unchanged?" What is it
19 relative to? It is a bit odd to have that -- I could see
20 that it is much, much less than an action level, but it
21 says ---

22 **MR. DESIRI:** For the record, Paul Desiri.

23 The discharge is unchanged because the
24 value is the same for both quarters. But if you estimate
25 what the total is, it is a significant decrease from 2004.

1 **MEMBER McDILL:** So quarter to quarter it is
2 unchanged, but over annual -- year-to-year -- it is much
3 less?

4 **MR. DESIRI:** For the record, Paul Desiri.
5 That is correct.

6 **MEMBER McDILL:** Thank you.

7 I guess the question would be why is it so
8 much less? That is good, but ---

9 **MR. DESIRI:** For the record, Paul Desiri.
10 The decrease is the result of a project to
11 reduce water emissions, which we made a lot of program
12 changes.

13 **MEMBER McDILL:** That is something that can
14 be carried over to -- I was going to see to Peterborough,
15 but I guess I shouldn't, because that is the hearing that
16 is coming later this morning.

17 **THE CHAIRPERSON:** You could, though, Dr.
18 McDill, because we made that statement about using one
19 into the other. So if that is what you would like to talk
20 about, that is fine.

21 **MEMBER McDILL:** I was just going to ask is
22 that a process that can be carried forward to other
23 facilities?

24 **MR. DESIRI:** For the record, Paul Desiri.
25 When we do make program improvements in one

1 facility we do share them with the other facility.

2 In this particular case it would not be
3 applicable, only because Toronto has a much greater
4 quantity of contaminated water to deal with than in
5 Peterborough.

6 **MEMBER McDILL:** Thank you.

7 **THE CHAIRPERSON:** Dr. Barnes?

8 **MEMBER BARNES:** Just two questions left.

9 Just to come back to the monitoring,
10 because you are required to perform at certain levels at
11 the boundary level, but could you remind me again to what
12 extent you are measuring emissions at some distance away
13 from the plant since there are residential areas on three
14 sides?

15 **MR. DESIRI:** For the record, Paul Desiri.

16 There are high-volume boundary air monitors
17 that are all around the perimeter of the Toronto facility.
18 There's five in total.

19 **MEMBER BARNES:** And what is the distance of
20 those from the stack?

21 **MR. DESIRI:** The distance -- I am just
22 going to see if I have the dimensions of the facility here
23 -- it is in the order of a couple of hundred feet.

24 Do you require ---

25 **MEMBER BARNES:** No, that is -- I looked for

1 a map too, and it is not in A-1 as I could see.

2 So the dispersement of uranium from the
3 stack would be, of course, a considerable distance from --
4 beyond 200 feet, correct?

5 **MR. DESIRI:** What we do to verify whether
6 there is actual discharges that are impacting the
7 environment is we have a comprehensive Soil Sampling
8 Program. We sample approximately 50 locations at large
9 distances from the facility and also closer and verify
10 that, year to year, there are not changes in the soil
11 concentration, which has been the case.

12 **MEMBER BARNES:** A question to staff then.

13 Given the uncertainty of using soil
14 analyses -- we saw this at Port Hope, as I recall, for
15 soil deposition and bi-tubation and so on -- and given
16 that there is residential areas on three sides here, would
17 you say that there is adequate monitoring for air
18 emissions of uranium in the region beyond the plant
19 itself?

20 **DR. THOMPSON:** Patsy Thompson, for the
21 record.

22 If you look at the CMD 05-H24.B, Table 4,
23 it indicates the amount of uranium discharged to air on a
24 yearly basis, and it's in the order of, you know, less
25 than 10 grams.

1 So with those kinds of emissions,
2 controlling at source is a more valuable monitoring tool
3 than monitoring the air off-site, just simply because the
4 amount is so low and the concentrations would be so low
5 that they would likely be around the detection level. And
6 so because of the low amount of releases, GE's
7 Environmental Monitoring Program and Effluent Monitoring
8 Program are suitable.

9 **MEMBER BARNES:** Those values are from the
10 stack measurement or from the boundary within the plant
11 measurement?

12 **DR. THOMPSON:** Patsy Thompson, for the
13 record.

14 The data reported in Table 4 ---

15 **MEMBER BARNES:** How is that? How do you
16 derive that data? How is it measured? Is it from the
17 stack itself or ---

18 **MR. DESIRI:** For the record, Paul Desiri.

19 That discharge quantity is determined from
20 a product of the volume of air released and the
21 concentration measured using isokinetic sampling of the
22 stack.

23 **MEMBER BARNES:** And so it is staff's
24 impression that there can be no confusion on these stack
25 values? You have every confidence that these are valid

1 quantities?

2 **MR. WERRY:** David Werry for the record.

3 Yes, we have confidence in the numbers.

4 When I'm on site, I look at those. That's one of the
5 routine compliance measurements that I take and I look and
6 discuss with licensee.

7 **MEMBER BARNES:** My other question right to
8 -- I'll put it to staff. In the CMD H24.1B, the oral
9 presentations, supplementary information from GE, there
10 was an Appendix 2, which had two union support letters,
11 which I found a little strange sort of attached to the GE
12 presentation as opposed to receiving them as separate
13 CMDs.

14 In a sense, these are expressions of
15 opinion from the union about the application. For
16 example, they've been critical and I'm not sure whether
17 they would still be attached in the way that they are. I
18 would have thought that the -- when we've had letters from
19 the union, and I haven't seen this in a form sort of
20 attached through the licensee as opposed to making
21 separate submissions through the Commission and therefore
22 being given as a separate CMD. So this is a procedural
23 question really for staff.

24 **THE CHAIRPERSON:** And as such, I think I
25 could answer perhaps, Dr. Barnes, is that if the unions

1 wish to make a presentation here as a CMD, a letter would
2 go to the Secretary to be formally registered as a CMD.
3 In this case, it was not registered. The unions chose not
4 to make it a CMD.

5 Is there any question about them? So it's
6 really a procedural question in terms of -- you're right
7 -- for them to choose to do that.

8 Any further questions from Commission
9 Members, round two at all?

10 Well, thank you very much. This completes
11 the record for the public hearing in the matter of the
12 application by General Electric Canada Inc. for the
13 renewal of the operating licence for the Toronto nuclear
14 fuel facility. The Commission will deliberate and will
15 publish its decision in due course, and it will be posted
16 on the CNSC Website and distributed to participants.

17 We are going to start with the next one in
18 10 minutes. Thank you.

19 --- Upon recessing at 9:36 a.m.

20