



SRB TECHNOLOGIES (CANADA) INC.

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Attn: Consultation
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario
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Subject: Discussion Paper DIS-15-01 – Proposal to Amend the NNIECR

With respect to Discussion Paper DIS-15-01, *Proposal to Amend the Nuclear Non-proliferation Import and Export Control Regulations*, SRB Technologies (Canada) Inc. (SRBT) appreciates the opportunity to participate in the consultation process.

As a licensee that may be affected by the proposed amendments, SRBT offer the following comments, listed by section of DIS-15-01:

Section 2.1 – Proposed corrections / clarifications to schedule entries

No comments at this time.

Section 2.2 – Proposed exemptions to schedule entries

SRBT wholly supports the proposed exemption for the import and export of tritium contained in various articles and devices for illumination purposes. As a manufacturer of tritium powered self-luminous products, this proposed amendment would contribute to reducing regulatory burden.

We would suggest that the CNSC consider the following points:

- The current proposed text states that signs which have been installed in aircraft, ships or vehicles (conveyances) would be eligible for the exemption. Tritium-powered self-luminous safety signs are widely used in public and private buildings as well; we propose that the amended text include these types of signs as well.
- The same passage limits the exemption to signs which have been installed; we would propose adding text which includes the import and export of new signs (i.e. have not yet been installed) which are intended to be installed in buildings, aircraft, ships, vehicles and other conveyances.

Section 2.3 – Proposed additional application information requirements

The new entries for information to be included with an application for a licence are thought to be reasonable; however, smaller licensees may experience an appreciable increase in regulatory burden in order to comply with the provisions.

Section 2.4 – Proposed record retention requirement

A six-year retention period for the records listed is reasonable and achievable; however, SRBT would recommend that CNSC define the concept of a 'record' as clearly as possible – for example, is it compliant if the original paper copy of a record is converted to an electronic format (such as a scan), and then only the electronic copy be retained for the full six-year period?

Section 2.5 – Proposed amendment to the *General Nuclear Safety and Control Regulations*

No comments at this time.

Section 4 – Public Input

The proposed amendments if enacted are expected to affect the administrative activities of approximately five employees of our company. These employees would include the Manager of Import / Export, and the Manager of Regulatory Affairs, as well as a few staff members who perform specific duties relating to packaging and transport of our products.

Over a one-year period, it is estimated that the amendments would require a total of between 50 – 100 hours to be allocated to perform new administrative tasks.

The amendments as written are estimated to potentially save 20 hours through the exemption.

As a suggestion on how costs could be reduced while continuing to fulfill the objective of the proposal and without compromising safety, if the amendment included an exemption for the import and export of newly manufactured tritium-powered signs that have not yet been installed, and included signs that are destined to be or have been installed in buildings, the hours saved through exemption would likely exceed 500 hours over any given year. Clearly, this represents a significant lessening of the regulatory burden on our business in this respect.

Please don't hesitate to contact Mr. Ross Fitzpatrick (Vice-President – ross@betalight.com), Mr. Jamie MacDonald (Manager of Health Physics and Regulatory Affairs – jamie@betalight.com) or myself at any time should you have any questions on the new website or our Public Information Program.

Best Regards,



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cc: J. Campbell, CNSC
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