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Oral presentation

Exposé oral

**Written submission from
BWXT Medical Ltd.**

**Mémoire de
BWXT Medical Ltd.**

In the Matter of the

À l'égard de

TRIUMF Accelerators Inc.

TRIUMF Accelerators Inc.

Application by TRIUMF Accelerators Inc.
for renewal of operating licence for its
particle accelerator facilities

Demande de TRIUMF Accelerators Inc. pour le
renouvellement de son permis d'exploitation
pour ses installations dotées d'un accélérateur
de particules

Commission Public Hearing

Audience publique de la Commission

March 23, 2022

23 mars 2022



4th February 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: interventions@cnsccsn.gc.ca

Re: TRIUMF Accelerators Inc. Class IB Licence renewal (March 23-24, 2022 Public Hearing)

Dear President and Commission Members,

Please accept this letter in strong support of the Application for a Class IB License submitted by TRIUMF Accelerators Inc.

BWXT Medical Ltd. is formed from the acquisition of Nordion's medical isotope business in 2018, and is headquartered in Ottawa, Ontario and employs over 250 highly skilled people in Ottawa and in Vancouver. The company develops, manufactures and supplies radiopharmaceuticals and medical isotopes to radiopharmaceutical companies, hospitals, radiopharmacies, and ultimately, to the patients who need them, in Canada and around the world.

TRIUMF has been successfully deploying its particle accelerator and expert personnel for over forty years to produce medical isotopes, and is currently our key isotope cyclotron irradiation and production partner. TRIUMF works in partnership with BWXT Medical to produce and supply critical medical isotopes for research, diagnostic and therapeutic use. Medical isotopes produced on the TRIUMF site are processed and supplied by BWXT to help patients and researchers in Canada and around the world. As an example, BWXT Medical is one of only two companies in the world supplying Sr-82 to manufacturers of rubidium generators for use in an important PET cardiology procedure – TRIUMF is BWXT Medical's key partner in the manufacture and supply of this isotope.

BWXT has been impressed by TRIUMF's high level of commitment to safety in our production partnership. As an illustrative example, on October 7, 2021, TRIUMF issued a stop work order to its Solid Target Facility (STF) and all associated systems in order to repair a nuclear ventilation system breakdown. The stop work order resulted in an immediate disruption to BWXT Medical's strontium production, thereby directly impacting TRIUMF's revenues tied to this program. Impact notwithstanding, the decision to act was swift and driven by TRIUMF's commitment to safety and the environment. After investigation of the issue, it was determined that the appropriate fix required TRIUMF to schedule a multi-day shutdown of its main cyclotron; an action that resulted in a site-wide impact that halted nearly all research and irradiation testing activities across the organization. Deemed critical, the work was precisely planned and carried out, beginning on November 9, 2021 and completing ahead of

schedule on November 12, 2021, with good communication to all throughout the process. TRIUMF prioritized safe operations, while executing the repair in a careful and efficient manner that allowed us to restart production as quickly as possible – minimizing the loss of target irradiation time and ensuring more isotopes were delivered to patients. This event, while inconvenient for business, is a testament to TRIUMF's commitment to safe and efficient operations, and is indicative of why they are a trusted partner for BWXT Medical.

BWXT has been working closely and successfully with the highly qualified TRIUMF production and safety teams and looks forward to working with TRIUMF to expand our joint product development initiatives to provide health and hope for patients in Canada and other parts of the globe.

As part of this effort, BWXT strongly supports TRIUMF's application for a 10-year Class IB license. This will position us to be a reliable supplier of medical isotopes, strengthening and securing Canada's medical isotope supply chain.

Sincerely,

A handwritten signature in blue ink that reads "M Coombs".

Martyn Coombs
President
BWXT Medical