Directorate of Nuclear Substance Regulation

September 9, 2021

Jill Robertson
Dalhousie University
Environmental Health and Safety Office
1435 Seymour Street
PO Box 1500
Halifax, NS B3H 4R2

Subject: Nuclear Substance and Radiation Device Licence No. 07154-2-22.8

Dear Licensee:

As requested, please find enclosed Nuclear Substance and Radiation Device Licence No. 07154-2-22.8, issued pursuant to section 24 of the Nuclear Safety and Control Act. The information submitted meets the regulatory requirements, policies and guidance of the Canadian Nuclear Safety Commission (CNSC).

Also enclosed is a list of relevant CNSC documents that are available in paper copy or in electronic form. The instructions on how to obtain a copy of these documents are indicated on the list.

The format for all licences is comprised of a main body and appendices attached to the licence. All appendices, attachments and documents referenced in the licence form part of the licence and therefore become requirements for the facility and are classified as prescribed information.

The licence sections are entitled:

I LICENCE NUMBER
II LICENSEE
III LICENCE PERIOD
IV LICENSED ACTIVITIES
V CONDITIONS

Appendices

For security reasons, prescribed information shall be safeguarded pursuant to sections 21 to 23 of the General Nuclear Safety and Control Regulations. The new licence format allows the licensee to post a copy of the main body of the licence (sections I through V), excluding the appendices, pursuant to sub-section 14(1) of the General Nuclear Safety and Control Regulations.

If you have any questions about the licence, please do not hesitate to contact us:

- For licence fee matters, contact Cost Recovery at 1 (888) 229-2672.
- For administrative matters, contact a Licensing Administrator at 1 (888) 229-2672.
- For technical matters, contact a Licensing Specialist at 1 (888) 229-2672.

Yours sincerely,

Sylvain Faille
Director
Nuclear Substances and Radiation Devices Licensing Division

Enclosures
I) LICENCE NUMBER: 07154-2-22.8

II) LICENSEE

Pursuant to section 24 of the Nuclear Safety and Control Act, this licence is issued to:

Dalhousie University
6299 South Street
Halifax, NS
B3H 4H6
Canada

This licence replaces licence 07154-2-22.7.

III) LICENCE PERIOD

This licence is valid from: September 9, 2021 to June 30, 2022 unless otherwise suspended, amended, revoked or replaced.

IV) LICENSED ACTIVITIES

This licence authorizes the licensee to:

(a) possess, transfer, import, export, use and store the nuclear substances and the prescribed equipment listed in the Appendix: Nuclear Substances and Radiation Devices of this licence.

(b) conduct licensed activities in the location(s) specified in the Appendix: Locations of Licensed Activities of this licence.

This licence is issued for: consolidated uses of nuclear substances (815).

V) CONDITIONS

The contents of the appendices attached to this licence form part of the licence.

1. Prohibition of Human Use
   This licence does not authorize the use of nuclear substances in or on human beings.
   (2696-0)

2. List of Areas, Rooms and Enclosures
   The licensee shall maintain a list of all areas, rooms and enclosures in which more than one exemption quantity of a nuclear substance is used or stored.
   (2569-2)

3. Posting of Safety Poster(s)
   The licensee shall post and keep posted, in a readily visible location in areas, rooms or enclosures where nuclear substances are handled, a radioisotope safety poster approved by the Commission or a person authorized by the
Commission, which corresponds to the classification of the area, room or enclosure.
(2570-4)

4. Storage
The licensee shall:
(a) ensure that when in storage radioactive nuclear substances or radiation devices are accessible only to persons authorized by the licensee;
(b) ensure that the dose rate at any occupied location outside the storage area, room or enclosure resulting from the substances or devices in storage does not exceed 2.5 microSv/h; and
(c) have measures in place to ensure that the dose limits in the Radiation Protection Regulations are not exceeded as a result of the substances or devices in storage.
(2575-2)

5. Area Classification
The licensee shall classify each room, area or enclosure where more than one exemption quantity of an unsealed nuclear substance is used at a single time as:

(a) basic-level if the quantity does not exceed 5 ALI,
(b) intermediate-level if the quantity used does not exceed 50 ALI,
(c) high-level if the quantity does not exceed 500 ALI; or,
(d) containment-level if the quantity exceeds 500 ALI.

Except for the basic-level classification, the licensee shall not use unsealed nuclear substances in these rooms, areas or enclosures without written approval of the Commission or a person authorized by the Commission.
(2108-4)

6. Contamination Meter Requirements
The licensee shall make available to workers at all times at the site of the licensed activity a properly functioning portable contamination meter.
(2572-1)

7. Survey Meter Requirements
The licensee shall provide at all times where nuclear substances, except for Hydrogen-3 and Nickel-63, are handled or stored a radiation survey meter.
(2058-1)

8. Contamination Criteria
The licensee shall ensure that for nuclear substances listed in the Appendix: Classes of Radionuclides, attached to this licence:
(a) non-fixed contamination in all areas, rooms or enclosures where unsealed nuclear substances are used or stored does not exceed:
   (i) 3 becquerels per square centimetre for all Class A radionuclides;
   (ii) 30 becquerels per square centimetre for all Class B radionuclides; or
   (iii) 300 becquerels per square centimetre for all Class C radionuclides; averaged over an area not exceeding 100 square centimetres; and
(b) non-fixed contamination in all other areas does not exceed:
   (i) 0.3 becquerels per square centimetre for all Class A radionuclides;
   (ii) 3 becquerels per square centimetre for all Class B radionuclides; or
   (iii) 30 becquerels per square centimetre for all Class C radionuclides; averaged over an area not exceeding
9. Thyroid Monitoring  
(a) Every person who in any 24-hour period uses a total quantity of Iodine 124, Iodine-125 or Iodine-131 exceeding:
   (i) 2 MBq in an open room;
   (ii) 200 MBq in a fume hood;
   (iii) 20 000 MBq in a glove box; or
   (iv) any approved quantity in any room, area or enclosure authorized in writing by the CNSC shall undergo thyroid screening within a period more than 24 hours after the last use that resulted in any of the above limits being exceeded and less than 5 days after the limit was exceeded.
(b) Every person who in any 24-hour period uses a total quantity of Iodine-123 exceeding:
   (i) 200 MBq in an open room;
   (ii) 20,000 MBq in a fume hood;
   (iii) 2,000,000 MBq in a glove box; or
   (iv) any approved quantity in any room, area or enclosure authorized in writing by the CNSC shall undergo thyroid screening within a period more than 8 hours after the last use that resulted in any of the above limits being exceeded and less than 48 hours after the limit was exceeded.
(c) Every person who is involved in a spill greater than 2 MBq of Iodine-124, Iodine-125 or Iodine-131 or on whom external contamination is detected, shall undergo thyroid screening within a period more than 24 hours after the spill and less than 5 days after the spill or contamination.
(d) Every person who is involved in a spill of greater than 200 MBq of Iodine-123 or on whom external contamination is detected, shall undergo thyroid screening within a period more than 8 hours after the spill and less than 48 hours after the spill or contamination.

10. Thyroid Screening  
Screening for internal Iodine-123, Iodine 124, Iodine-125 and Iodine-131 shall be performed using:
(a) a direct measurement of the thyroid with an instrument that can detect 1 kBq of Iodine-124, Iodine-125 or Iodine-131, or 10 kBq of Iodine-123; or
(b) a bioassay procedure approved by the Commission or a person authorized by the Commission.

11. Thyroid Bioassay  
If thyroid screening detects more than 10 kBq of Iodine-124, Iodine-125, Iodine-131 or 100 kBq of Iodine-123 in the thyroid, the licensee shall immediately make a preliminary report to the Commission or a person authorized by the Commission and have bioassay performed within 24 hours by a person approved by the Commission to provide internal dosimetry.

12. Extremity Dosimetry - Beta Emitters  
The licensee shall ensure that any person who handles a container which contains more than 50 MBq of phosphorus 32, strontium 89, yttrium 90, samarium 153 or rhenium 186 wears a ring dosimeter. The dosimeters must be supplied and read by a dosimetry service licensed by the Commission.

13. Internal Authorization  
The licensee shall ensure that:
(a) internal authorizations are issued in accordance with the licensee's internal authorization policies and procedures approved by the Commission or a person authorized by the Commission; and
(b) internal authorization forms are posted in a readily visible location in or near each room, area or enclosure where nuclear substances and radiation devices are used or stored.
(c) the licensed activity is conducted in accordance with the terms and conditions of the internal authorization.

14. Project Approval
The licensee shall obtain written approval from the Commission or a person authorized by the Commission before starting any work requiring the use of more than 10,000 exemption quantities of a nuclear substance at a single time.

15. Disposal (General)
When disposing of unsealed nuclear substances set out in column 1 of the Appendix: Disposal Limits to municipal waste, to sewer systems or to atmosphere, the licensee shall ensure that the concentration limit set out for each nuclear substance is not exceeded.
(a) The concentration limits set out in column 2 apply to quantities of solid waste of less than three tonnes per building per year. Nuclear substances released to the municipal garbage system must be in solid form and uniformly distributed in the waste with a concentration that is less than the limits in column 2. Where more than one nuclear substance is disposed of at one time, the sum of the quotients obtained by dividing the quantity of each substance by its corresponding limit in column 2 shall not exceed one.
(b) The limits set out in Column 3 apply to the water soluble liquid form of each nuclear substance which may be disposed of per building per year. Where more than one nuclear substance is disposed of at one time, the sum of the quotients obtained by dividing the quantity of each substance by its corresponding limit in column 3 shall not exceed one.
(c) The concentration limits set out in Column 4 may be averaged over a one-week period and apply to releases of less than 3 million cubic metres per year. Where more than one nuclear substance is disposed of at one time, the sum of the quotients obtained by dividing the quantity of each substance by its corresponding limit in column 4 shall not exceed one.

16. Decommissioning
The licensee shall ensure that prior to decommissioning any area, room or enclosure where the licensed activity has been conducted:
(a) the total surface contamination (non-fixed plus fixed) for nuclear substances listed in the table titled "Classes of Nuclear Substances" found in Appendix Y of REGDOC-1.6.1 Licence Application Guide does not exceed:
   (i) 0.3 becquerels per square centimetre (0.3 Bq/cm²) for all Class A radionuclides;
   (ii) 3 becquerels per square centimetre (3 Bq/cm²) for all Class B radionuclides; and
   (iii) 30 becquerels per square centimetre (30 Bq/cm²) for all Class C radionuclides; averaged over an area not exceeding 100 square centimetres;
(b) the release of any area, room or enclosure containing fixed surface contamination in excess of the values listed in paragraph (a), is approved in writing by the Commission or person authorized by the Commission;
(c) all nuclear substances and radiation devices have been transferred in accordance with the conditions of this licence; and
(d) all radiation warning signs have been removed or defaced.

(2571-6)

17. Annual Compliance Report
The licensee shall, by April 30 of each year, submit to the Commission a written annual compliance report in the form specified at www.nuclearsafety.gc.ca/acr.

(2912-3)

18. Sealed Source Tracking (General)
Unless otherwise permitted by the prior written approval of the Commission or a person authorized by the Commission the licensee shall, in respect of a radioactive nuclear substance set out in column 1 of the table below, report in writing to the Commission or a person authorized by the Commission any transfer, receipt, export or import of a sealed source whose corresponding activity is equal to or greater than the value set out in column 2 of the table:

- (a) at least 24 hours before any transfer within Canada,
- (b) at least 7 days before any export, and
- (c) within 48 hours of any receipt of a transfer or import.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nuclear Substance</td>
<td>(TBq)</td>
</tr>
<tr>
<td>__________________________</td>
<td>________</td>
</tr>
<tr>
<td>Americium 241</td>
<td>0.6</td>
</tr>
<tr>
<td>Americium 241/Beryllium</td>
<td>0.6</td>
</tr>
<tr>
<td>Californium 252</td>
<td>0.2</td>
</tr>
<tr>
<td>Curium 244</td>
<td>0.5</td>
</tr>
<tr>
<td>Cobalt 60</td>
<td>0.3</td>
</tr>
<tr>
<td>Cesium 137</td>
<td>1</td>
</tr>
<tr>
<td>Gadolinium 153</td>
<td>10</td>
</tr>
<tr>
<td>Iridium 192</td>
<td>0.8</td>
</tr>
<tr>
<td>Promethium 147</td>
<td>400</td>
</tr>
<tr>
<td>Plutonium 238</td>
<td>0.6</td>
</tr>
<tr>
<td>Plutonium 239/Beryllium</td>
<td>0.6</td>
</tr>
<tr>
<td>Radium 226</td>
<td>0.4</td>
</tr>
<tr>
<td>Selenium 75</td>
<td>2</td>
</tr>
<tr>
<td>Strontium 90 (Yttrium 90)</td>
<td>10</td>
</tr>
<tr>
<td>Thulium 170</td>
<td>200</td>
</tr>
<tr>
<td>Ytterbium 169</td>
<td>3</td>
</tr>
</tbody>
</table>

The written report shall be in a form acceptable to the Commission that includes:

- (a) on transfer or export of a sealed source(s),
  - (i) the date of transfer or export,
  - (ii) the export licence number (where applicable),
  - (iii) the name of the recipient and licence number or the name of the importer,
  - (iv) the address of the recipient's or importer's authorized location,
  - (v) the nuclear substance (radionuclide),
  - (vi) activity (radioactivity) (Bq) per sealed source on the reference date,
  - (vii) the reference date,
  - (viii) the number of sealed source(s),
  - (ix) the aggregate activity (Bq),
  - (x) the sealed source unique identifiers (if available), and
(xi) where the sealed source is incorporated in a prescribed equipment,
   (1) the name and model number of the equipment, and
   (2) the equipment serial number (if available)
(b) on receipt or import of a sealed source(s),
   (i) the date of receipt of a transfer or import,
   (ii) the name of the shipper and licence number or the name of the exporter,
   (iii) the address of the shipper's or exporter's authorized location,
   (iv) the nuclear substance (radionuclide),
   (v) activity (radioactivity) (Bq) per sealed source on the reference date,
   (vi) the reference date,
   (vii) the number of sealed source(s),
   (viii) the aggregate activity (Bq),
   (ix) sealed source unique identifiers (if available), and
   (x) where the sealed source is incorporated in a prescribed equipment,
      (1) the name and model number of the equipment, and
      (2) the equipment serial number (if available)

For the purposes of this condition, a transfer includes movement of a sealed source between a licensee's licensed locations.
(2406-17)

19. Financial Guarantee
The licensee shall maintain, at all times, a financial guarantee in respect of the activities authorized by this licence of a value set by the Commission and in a form acceptable to the Commission.
(2020-2)

20. Sealed Source Security Requirements
The licensee shall meet the security measures for sealed sources as set out in Regulatory Document REGDOC-2.12.3, Security of Nuclear Substances: Sealed Sources, as amended from time to time. The sealed source categories are specified in REGDOC-2.12.3.
(2490-3)

21. Operation Limitations
Subject to any other condition of this licence and unless otherwise permitted by the prior written approval of the Commission or a person authorized by the Commission, the licensee shall carry out the licensed activities in accordance with the documents or parts thereof referred to in the Appendix: Licence Document(s).
(2917-7)

22. Inaccuracies Notification
The licensee shall report to the Commission or a person authorized by the Commission, as soon as is practicable, the discovery of any inaccuracy or incompleteness in the documents referred to in the Appendix: Licence Document(s).
(2920-6)

23. Safeguards
The licensee shall implement and maintain a safeguards program in accordance with the requirements set out in REGDOC-2.13.1 Safeguards and Nuclear Material Accountancy.
(2410-1)

24. Export Limitations - Sealed Sources
This licence does not authorize the licensee, in respect of a radioactive nuclear substance set out in column 1 of the table below, to export a sealed source whose activity is equal to or greater than the value set out in column 2 of the table:

<table>
<thead>
<tr>
<th>Nuclear Substance</th>
<th>Column 2 (TBq)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Americium 241</td>
<td>0.6</td>
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<td>10</td>
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<td>Thulium 170</td>
<td>200</td>
</tr>
<tr>
<td>Ytterbium 169 (2408-9)</td>
<td>3</td>
</tr>
</tbody>
</table>

25. Import and Export Restrictions
This licence does not authorize the licensee to import or export the following items as described in the schedule, Parts A and B, to the Nuclear Non-proliferation Import and Export Control Regulations, subject to any restrictions or exemptions as noted in each paragraph of the schedule:

(1) Special fissionable material, as described in paragraph A.1.1:
   (i) Plutonium;
   (ii) Uranium 233;
   (iii) Uranium enriched in Uranium 233 or Uranium 235.
(2) Source material, as described in paragraph A.1.2:
   (i) Uranium, containing the mixture of isotopes that occurs in nature;
   (ii) Uranium, depleted in the isotope Uranium 235;
   (iii) Thorium.
(3) Deuterium and heavy water, as described in paragraph A.1.3.
(4) Tritium, as described in paragraph A.1.5.
(5) Alpha-emitting nuclear substances, as described in paragraph B.1.1.1, including but not limited to:
   (i) Actinium 225, 227;
   (ii) Californium 248, 250, 252, 253, 254;
   (iii) Curium 240, 241, 242, 243, 244;
   (iv) Einsteinium 252, 253, 254, 255;
   (v) Fermium 257;
   (vi) Gadolinium 148;
   (vii) Mendelevium 258, 260;
   (viii) Neptunium 235;
(ix) Polonium 208, 209, 210;
(x) Radium 223.
(6) Radium-226, as described in paragraph B.1.1.16.
(2480-11)

Designated Officer pursuant to paragraph 37(2)(c) of the Nuclear Safety and Control Act