



**Final submission from the  
County of Renfrew**

**Mémoire définitif du  
Comté de Renfrew**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories (CNL)**

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**Laboratoires Nucléaires Canadiens (LNC)**

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Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

**Commission Public Hearing  
Part 2**

**Audience publique de la Commission  
Partie 2**

**May and June 2022**

**Mai et juin 2022**

Office of the  
County Warden



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May 31, 2023

Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater Street  
P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

**Subject: Canadian Nuclear Laboratories' application to authorize the construction of a Near Surface Disposal Facility**

To Whom it May Concern:

The Intervener

The County of Renfrew is an upper tier municipal government in the Province of Ontario that represents seventeen lower tier municipalities. The Algonquins of Pikwakanagan First Nation and the City of Pembroke are two separate communities geographically located within Renfrew County and we represent a combined population of 107,855. These two communities are not part of this intervention.

The County of Renfrew wishes to intervene in support of the site licence amendment and the inclusion and approval of the construction and operation of a Near Surface Disposal Facility (NSDF) at Chalk River Laboratories.

Our Knowledge of Activities at, and Familiarity with, Chalk River Laboratories

Chalk River Laboratories (CRL) operated by Canadian Nuclear Laboratories (CNL) and owned by the Crown Corporation Atomic Energy of Canada Ltd. (AECL), is located in Renfrew County. Chalk River Laboratories has operated here since 1945 and has been a large, stable, community-minded major employer throughout that time. CRL is the major employer and economic driver in northern Renfrew County and its' direct economic impact extends to every municipality in the county and beyond to Pontiac County in Quebec and to the City of Ottawa. Its economic impact further extends across Eastern Ontario and Canada.

County of Renfrew County Council recognizes that CRL is the property of the Government of Canada and is the property of and an asset to all the people of Canada.

Our 2021 Social, Economic and Environmental Impact Analysis of CNL/CRL (Impact Analysis) was conducted to provide our elected leaders of County Council, our residents and the business community with a more complete understanding of the operations and economic impact of CRL across Renfrew County. The Impact Analysis also examined the proposed NSDF project and its' specific economic and environmental impacts.

This revealed that CRL provides \$380 million in direct wages and benefits annually to the approximately 2,700 employees who are residents of the county. This personal income of the employees is largely spent on goods, services, home ownership or rental, and municipal taxes in Renfrew County. Presently underway, the 10-year CRL site renewal program is averaging spending of \$120 million annually. This creates an additional 672 person years of employment for mostly local and regional contractors, construction, engineering, and trades workers for the duration of the site renewal project. Normal operations of CRL involve an average spending of \$115 million for goods and services. This data demonstrates the vital importance of the continued operation of CRL to the sustainability of our communities, businesses, workforce, schools and public services.

County Council, and all our municipal councils, are invited annually by CNL to tour the CRL facilities to learn of new projects and activities and to assist municipal leaders to become more familiar with the work and operations conducted at CRL. CNL Senior Leadership annually presents as a delegation to our County Council and to our lower tier municipal councils. County Council also has a representative on the Chalk River Laboratories' Environmental Stewardship Council.

#### Our Awareness and Knowledge of the Near Surface Disposal Facility (NSDF) Proposal

County Council has been fully aware of the NSDF project since 2016 when CNL distributed media releases to all our local print, video, e newsletter and radio media outlets. Following the public information sharing, CNL CEO and Senior Leadership team were a delegation to County Council to present detailed information on the NSDF project and to answer questions directly from county councillors. Since that time, County Council has been updated annually on the NSDF project and the many other site renewal, demolition and construction projects at CRL. There were also three site visits and tours of CRL by county and municipal councillors.

County Council understands and recognizes how the NSDF will be constructed and operated. As municipal leaders, we are familiar with landfills, transfer stations and disposal facilities. Managing municipal solid waste effectively is a high priority of municipal leadership. We have an understanding of the types of material that are proposed to be stored in the NSDF and that the facility must be managed for a very long period. We recognize that its' construction, envelope, leachate collection and scrubbing, capping and monitoring is much more sophisticated and robust than that of a municipal landfill, and that the NSDF will be a highly engineered facility designed for a service life measured in centuries.

We have been fully informed by CNL of the need for the NSDF to enable the site renewal projects to proceed. It is the County of Renfrew's interest and that of the Government of Canada to sustain and expand the science mission of CRL so that nuclear science research and development can continue and expand. The forward thinking and proactive renewal of CRL will ensure that world-leading scientific research into advanced materials, hydrogen isotopes, clean energy production, advanced nuclear fuels and production of radioisotopes for human health and cancer therapy will continue in Renfrew County and across Canada.

We fully understand and accept that the NSDF is essential for the future operations of CRL, as it will be the repository for low-level waste resulting from the demolition of over 100 redundant structures at CRL. We also understand that the NSDF will receive low-level waste from hospitals, universities and industrial operations to provide a safe, secure and highly engineered solution to support higher education, the delivery of vital nuclear medicine and cancer therapy treatments and to support businesses that utilize radioactive materials in their processes and products. An example of that would be a local manufacturer of self-illuminating safety and emergency signage and lighting for aviation, military, mining and building applications worldwide. This company's low-level waste is presently managed at CRL, and the NSDF will enable the continued safe long-term management of that material.

CNL has also informed County Council and the public that construction and demolition materials from Whiteshell Laboratories in Pinawa, Manitoba will be transported to CRL to be deposited in the NSDF. We understand that this material is similar to the construction and demolition waste material resulting from the demolition of low-level contaminated structures at CRL.

County Council fully accepts that the NSDF is the appropriate solution for the long-term storage of low-level waste from CRL and across Canada. As elected leaders, we acknowledge that we do not have the scientific expertise or knowledge to come to this conclusion independently.

We recognize the expertise of CNL staff and contractors, the testing processes of Queen's University in Kingston, Ontario and the rigorous oversight of the professional staff of Atomic Energy of Canada, Ltd. Finally, we rely on the expertise, experience and due diligence of the professional staff of the Canadian Nuclear Safety Commission and the Commission members.

#### Benefits of the Near Surface Disposal Facility to Renfrew County

The NSDF will improve the existing environmental conditions at CRL, enabling the clean-up of nuclear legacy contaminated soils and materials, and their safe and appropriate storage and long-term monitoring in a modern containment facility, recognized as an international best practice for management of low-level nuclear waste. CNL has shared with us the history of early radioactive waste disposal practices and it is obvious that the NSDF depository is a far better and more modern solution for these legacy wastes. This is clearly the case for the structure demolition low-level waste stream being generated through the site renewal program.

County Council is aware of the very similar project for low-level radioactive waste management project, being delivered by CNL on behalf of AECL, in Port Hope and Clarington Township, located adjacent to Highway 401.

We are confident that the water of the Ottawa River, and all our waterways and groundwater resources, will be better protected from radioactive contamination over the long-term by the NSDF. We expect our council, future councils and residents of Renfrew County to be regularly and fully informed by CNL, AECL, CNSC and the Government of Canada on the performance and safety of the NSDF over the next three centuries.

County Council accepts that the vast majority (90%) of the low-level waste to be disposed of in this facility will originate on the CRL site. We agree with CNL staff that transporting this material anywhere else for storage would be imprudent, costly and would not offer a better or safer solution than storage, essentially in situ, at CRL. Transporting these materials, even one metre further than required, would be a poor risk management decision. Most importantly, the expertise within the human resources that are and will be present on site at CRL is the most vital component for the long-term safe operations, maintenance and monitoring of the NSDF.


As a nuclear host community, Renfrew County has derived great economic benefit from CNL operations since 1945, and we hope to continue to derive economic benefits far into the future. It is our responsibility, as a willing and informed host community, to take on the role of hosting the long-term storage solution of the by-products of the world-leading nuclear science that has, and will continue to be, conducted at CRL. We understand and accept the value to Canadian academia, industry and medical institutions the management of their low-level waste materials in this NSDF facility at CRL here in Renfrew County.

The County of Renfrew is strongly committed to building upon the historic relationship that exists between CRL, CNL and AECL, and the County. The NSDF will be a cornerstone for the future of that relationship and to the future of Canada, especially in the areas of Science, Technology, Engineering and Mathematics - the vital STEM streams of education and careers.

We look forward to a positive decision by the CNSC in order for this process to conclude so that CNL can begin to address the low-level waste issue as soon as possible.

Thank you for providing the opportunity to file our written submission on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Emon', with a stylized flourish at the end.

Peter Emon, Warden

[warden@countyofrenfrew.on.ca](mailto:warden@countyofrenfrew.on.ca)