



**Final submission from the  
Organization of Canadian Nuclear  
Industries**

**Mémoire définitif de l'  
Organization of Canadian Nuclear  
Industries**

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**

Good Moring, I'm pleased to be here today as both a nuclear professional and long-time resident of Deep River, in support of Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site license to authorize the construction of a near surface disposal facility. This 2023 submission is similar to OCNI's submission in 2022 expressing our support for Chalk River Laboratories.

The Organization of Canadian Nuclear Industries (OCNI) is the leading voice of the Canadian nuclear supply chain and its 240 members and associates. Founded in 1979, OCNI actively promotes the production of safe, clean and reliable nuclear energy, as well as the establishment of the needed infrastructure to carry out and manage nuclear projects in Canada. In 1979, the Canadian nuclear landscape looked different than it does today, smaller and with fewer reactors, but even then the industry was anchored by Atomic Energy of Canada Ltd and its Chalk River Laboratories site. Our industry has grown and changed over the last 40 years and Canada is a Tier 1 nuclear nation competing to supply products and services around the world. The labs, research reactors and experts at CNL contribute to the very vital role that CNL plays today in the Canadian nuclear industry and on the global stage.

And, just as it has for the last 40 years, OCNI is proud to support Canadian Nuclear Laboratories' (CNL) in its applications for various activities to support the Canadian nuclear supply chain, including today's application to authorize the construction of a near surface disposal facility (NSDF) for low-level radioactive waste.

One of the reasons that Canada is a competitive Tier 1 nuclear nation is because Canada has a long history of safely executing nuclear projects and managing nuclear assets, all under the governance of the Canadian Nuclear Safety Commission (CNSC). For approximately 70 years the Canadian nuclear industry has developed and refined its expertise as a Tier One nuclear country, and this includes its world class nuclear regulatory regime, evidenced through its influence on the nuclear regulatory practices in other CANDU countries. The CNSC, through its continuous investigation of new technologies and international collaboration, is able to provide Canadians a strong and reliable licensing framework for nuclear operators that helps ensure the safest and most robust nuclear activities. Today, as I'm working with Canadian suppliers in countries across Europe, the CNSC is well known and active in promoting regulatory excellence.

But, to continue our tradition as a strong Tier One nuclear country Canada must now implement solutions to ensure the safe and secure disposal of the waste products from its many nuclear activities. To date, the industry has mostly relied upon interim solutions for storage either because the current volume, activities or requirements did not yet require a more permanent solution. Now, with active refurbishments and revitalization projects across the industry, the time has come for the Canadian nuclear industry to execute its long-planned solutions for the disposal of waste from nuclear projects and operations. In fact, as I meet with industries in Canadian locations that are new to nuclear and who are considering some of the SMR projects that are being looked at, the question of waste products from producing nuclear energy comes up regularly. The time is now for our industry to become more

comfortable answering that question, and to make use of the many modern technologies and depth of Canadian expertise in developing our solutions.

Today, we are specifically considering Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site license to authorize the construction of a near surface disposal facility.

This facility is a permanent and environmentally sound technological solution that includes a highly engineered containment mound, site infrastructure and wastewater treatment facilities. This design uses natural and synthetic barriers that work together to ensure the integrity of the facility will last more than a thousand years – much longer than the time it will take for the radioactivity contained within to decay to a safe level. Furthermore, all waste to be disposed at the facility would be required to meet established waste acceptance criteria to assure compliance with operational and long-term safety requirements. As a nuclear energy professional with more than twenty years of experience I know that the design will be appropriate for its contents, the requirements will be sound and it will be operated safely. These traits have been demonstrated over and over by our industry and, as mentioned, some of the reasons why Canada is a Tier 1 nuclear nation.

In addition to presenting OCNI's support for this project I wish to add my personal endorsement as a long time resident of Deep River. I am fortunate to have lived in Deep River and to have benefited from an education about the benefits and safe use of nuclear energy, all while enjoying the pristine natural environment surrounding the site. As a result, I am extremely confident in CNL's ability to safely execute and operate the proposed Near Surface Disposal Facility according to the terms of the proposed license amendment.