



**Written submission from the
Waste Strategy Program at CNL**

**Mémoire du Programme de la
stratégie des déchets aux LNC**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories (CNL)

Laboratoires Nucléaires Canadiens (LNC)

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



2022-04-11

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

Subject: Canadian Nuclear Laboratories' Application to Amend its Chalk River Laboratories Site Licence to Authorize the Construction of a Near Surface Disposal Facility IAA Reference Number: 80122

Dear Secretariat:

On behalf of the Canadian Nuclear Laboratories' (CNL) Waste Strategy Program, we are submitting this letter of positive intervention in support CNL's application to amend the Chalk River Laboratories (CRL) site licence to authorize construction of the Near-Surface Disposal Facility (NSDF).

The Waste Strategy Program is responsible to ensure integration of waste management across CNL and to define and optimize routes for all CNL managed waste for the full Waste Management Lifecycle. The decisions on the Waste Strategy are documented and communicated through CNL's Integrated Waste Strategy (IWS). Through implementation of the IWS, the intent of the Waste Strategy Program is to improve transparency and understanding of waste management to stakeholders and Indigenous Peoples.

CNL issued its first Integrated Waste Strategy in 2017; replacing the Chalk River focused Integrated Waste Plan, which was first issued in 2011. These documents were benchmarked from work completed by the United Kingdom's Nuclear Decommissioning Authority (UK NDA). CNL's Integrated Waste Strategy is constantly being reviewed to incorporate technological advances and stakeholder feedback, with an update to be published in 2023.

Additionally, the update will ensure alignment with Natural Resources Canada's (NRCan) modernizing of Canada's Policy Framework for Radioactive Waste Management and Decommissioning, and Canada's Integrated Strategy for Radioactive Waste (ISRW) led by the Nuclear Waste Management Organization (NWMO), which is currently being developed.

Disposing of Low Level Radioactive Waste (LLW) in a near surface facility has been part of the AECL/CNL strategy since 2013. CNL's proposed Near Surface Disposal Facility is a key enabler for CNL's work across Canada to reduce government liabilities in a safe and responsible manner. Additionally, disposal of LLW in near surface disposal facilities is in alignment with international best practice.

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Finding safe, permanent disposal options for Radioactive Waste is key to CNL's Integrated Waste Strategy and its Waste Management Lifecycle reduces the burden for future generations. The reliance on Radioactive Waste storage inevitably leads to re-work, resulting in increased safety risks when Radioactive Waste is re-handled. The proposed NSDF supports CNL's clean-up mission of reducing environmental liabilities, by permitting holistic planning of decommissioning and environmental remediation projects.

CNL is a leader in waste management and emphasizes responsible stewardship for all of its Waste Streams. CNL utilizes a Waste Hierarchy as a framework to enable an effective balance of priorities, with a focus on waste prevention. CNL is regularly re-evaluating current waste management practices to seek sustainable improvements, including diverting waste from disposal when feasible.

Thank you for providing the opportunity to intervene in this matter.

Regards,

A handwritten signature in black ink, appearing to read 'S. Gamley'.

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