



## **Oral presentation**

## **Exposé oral**

### **Written submission from Ish Theilheimer**

### **Mémoire d' Ish Theilheimer**

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**

Filed on April 6, 2022

## Intervention re: May 31 Public Commission Hearing – Canadian Nuclear Laboratories Near Surface Disposal Facility 3

To whom it may concern:

I wish to intervene in writing at the hearing. Here are my comments:

In a previous intervention, I argued against the NSDF because putting such a facility near the Ottawa River is a dangerous plan that cuts costs and jobs at the expense of public safety. Now, it appears, the project won't even save the money its supporters say it will. According to the document *Nuclear Waste Management Organization - Integrated Strategy for Radioactive Waste Project Report*, H365930-00000-200-066-0001, Rev. 0, August 19, 2021 ([https://radwasteplanning.ca/sites/default/files/project\\_report.pdf](https://radwasteplanning.ca/sites/default/files/project_report.pdf)), over 90% of Canada's current low level waste inventory could be unsuitable for disposal in an Engineered Containment Mound (ECM), because waste must be well characterized to meet the stricter safety case for an ECM (and most federal legacy waste has not yet been characterized).

The same study shows that the range of costs of an Engineered Containment Mound, a Concrete Vault, and a Shallow Rock Cavern all span \$5000 per cubic meter of waste. This translates to \$5 billion for a facility with a one million cubic meter capacity (the size of the proposed NSDF). Although an Engineered Containment Mound is the cheapest option shown, its average cost is \$2500 per m<sup>3</sup> of waste. This suggests that the current \$750 million total life-cycle cost estimate for the NSDF (*Safety Case*, p. 280) is a 5-fold underestimate. Approving the project with no independent review of this cost estimate is like buying a house without a home inspection. It would be, simply, irresponsible.

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Ish Theilheimer

Note: On April 9, 2022 - this intervenor requested to also make an oral presentation.