



**Written submission from the  
Society of United Professionals**

**Mémoire de la  
Society of United Professionals**

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**



**SOCIETY *of***  
**UNITED PROFESSIONALS**  
IFPTE 160

# CONSTRUCTION OF A NEAR SURFACE DISPOSAL FACILITY AT CANADIAN NUCLEAR LABORATORIES

SUBMITTED TO CANADIAN NUCLEAR SAFETY COMMISSION  
BY THE SOCIETY OF UNITED PROFESSIONALS

MARCH 30, 2022



The Society of United Professionals appreciates the opportunity to comment on Canadian Nuclear Laboratories' application to amend the Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility.

The Society of United Professionals ("Society") represents more than 8,700 engineers, scientists, supervisors, and other professionals mostly concentrated in Ontario's energy and legal sectors. The Society has represented professional workers since 1944.

The Society represents employees working for more than a dozen different employers in the energy sector, including Ontario Power Generation, Bruce Power, Nuclear Waste Management Organization, Hydro One, the Independent Electricity System Operator, the Ontario Energy Board, New Horizon System Solutions, Toronto Hydro, Kinectrics, and BWXT.

Society members work in every aspect of the electricity industry. They are involved in generation, transmission and distribution of electricity, management of the electricity system and market, and regulation and enforcement of standards. They are employed as first-line managers and supervisors, professional engineers, scientists, information systems professionals, economists, auditors and accountants, as well as serving in many other professional, administrative, and associated occupations.

The Society's members are knowledge workers who take great pride in exercising their civic, social, and professional responsibilities. As a union, the Society stands behind our members' professionalism, integrity, and commitment to excellence in all areas, particularly workplace safety, public health, and environmental sustainability.

Society members' expertise was acknowledged in Ontario's 2017 Long Term Energy Plan wherein it was stated:

For more than four decades, Ontario's electricity sector labour unions have been key partners in Ontario's nuclear industry. Today, Power Workers' Union and Society of Energy Professionals [as the Society of United Professionals was known at the time] together represent more than 23,000 employees in Ontario's electricity system, including our nuclear plants and supply chain companies. OPG and Bruce Power will continue to rely on their skills and expertise to refurbish our nuclear fleet and ensure safe operation for decades to come.

The Society takes great interest in proposals that support an advancement in nuclear science, a key technology in protecting our environment and combatting climate change.

Canadian Nuclear Laboratories' (CNL) application for a licence amendment to authorize the construction of a near surface disposal facility (NSDF) at the Chalk River Laboratories site seeks to create a permanent disposal facility for low-level radioactive waste.

The Society, having reviewed CNL's license amendment application, as well as the CNSC's Staff Submission on the license amendment application, supports the CNSC Staff's recommendation that the Commission accept CNL's license amendment request to authorize the construction of the NSDF at the Chalk River Laboratories site.



The CNSC Staff's Submission concluded that "the proposed NSDF project is protective of people and the environment, taking into account the implementation of all identified EA regulatory commitments and licensing regulatory actions"<sup>1</sup> and further states that the licensee's application complies with all applicable regulatory requirements.

The Society is satisfied with the CNSC's staff conclusions on this matter.

It is a core principle of the Society that whenever projects of this nature are considered, meaningful engagement with Indigenous communities must be a priority. The Chalk River Laboratories site is located on the unceded territory of the Algonquin Anishinaabe Nation.

The CNSC Staff's Submission states that the CNSC conducted extensive consultation with identified Indigenous Nations and communities to ensure their concerns were heard and addressed by CNL, AECL and the CNSC in a meaningful way, and that the CNSC staff "consider that the consultation and engagement process for the NSDF Project was meaningful, reasonable, responsive, and followed best practices."<sup>2</sup>

The Society is satisfied with the CNSC's assessment that the consultation process was meaningful and followed best practices.

As such, the Society supports CNL's application to amend the Chalk River Laboratories Site Licence to allow for the construction of a near surface disposal facility.

Respectfully submitted,

**Michelle Johnston**  
President, Society of United Professionals

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<sup>1</sup> CNSC Staff Report for the Construction of the Near Surface Disposal Facility (NSDF) at the Chalk River Laboratories (CRL) Site. January 24, 2022

<sup>2</sup> *ibid*