Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

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# Written submission from Jacques Plourde

# Mémoire de Jacques Plourde

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**

Canada

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

April 9, 2022

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:

I would like to submit a written intervention for the public meeting on May 31, 2022 focused on Canadian Nuclear Laboratories (CNL)'s application referenced above.

My name is Jacques Plourde, and I reside in Oshawa ON. I have over 45 years of experience performing various engineering, operations and maintenance functions in the Canadian nuclear industry, including 3 years of research at Chalk River at the very start of my career. In the past 11 years, I have provided risk control engineering services to a nuclear insurer in Canada. I believe that my time at Chalk River, my recent nuclear risk assessments of CNL facilities, and my extensive nuclear power plant operating experience in between, allow me to say a few words in favour of the proposed near surface disposal facility (NSDF).

Over the years, the designs I have produced, the projects I have managed and the decisions I have made were based on the principle that the public and the environment must be protected at all costs, and that one must constantly strive for improvement to mitigate risk.

So, has CNL applied this same principle with respect to low level waste (LLW) management and the NSDF solution? I propose to you that the answer is YES:

- CNL has a strong nuclear safety culture in the area of radioactive waste management, originating from years of reactor operation, mid-life refurbishments and laboratory programs, generating many different types of radioactive waste products. It's staff has a considerable respect for the radiological hazards associated with its operations, and continue to implement/improve measures to protect its employees and the general public.
  [Public Safety First]

- CNL had been safely storing LLW for many years at its facilities but is not content with the status quo. It was recognized early that a more robust, longer term, storage facility incorporating industry best practices would be needed. Such a facility would have the capacity to store both the inventory of LLW generated so far at Chalk River, and the additional waste originating from the rejuvenation of the Chalk River site and the decommissioning of its other facilities.
  [Continuous Improvement]

- The NSDF offers a viable long-term solution that will improve public and environmental safety even further than what CNL has managed to achieve so far:
    - Modern, state-of-the-art, design and materials
    - Excellent control and monitoring of radioactive emissions
    - Single, centralized, approach for LLW long-term storage

  [Risk Mitigation]

In conclusion, I believe that through the implementation of the NSDF, CNL is meeting its obligation at minimizing risk to the public and the environment, and therefore fully support this application.

Thank you for the opportunity to intervene in this matter,

Jacques Plourde