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Supplementary Information

Renseignements supplémentaires

Presentation from the Manitoba Métis Federation

Présentation de la Fédération des Métis du Manitoba

Canadian Nuclear Laboratories

Regulatory Oversight Report for
Canadian Nuclear Laboratories Sites:
2022

Laboratoires Nucléaires Canadiens

Rapport de surveillance réglementaire
des sites des Laboratoires Nucléaires
Canadiens : 2022

Commission Meeting

Réunion de la Commission

November 1-2, 2023

1-2 novembre 2023

Manitoba Métis Federation

The National Government of The Red River Métis

Canadian Nuclear Safety Commission

2022 Regulatory Oversight Report for Canadian Nuclear Laboratories
(CNL)

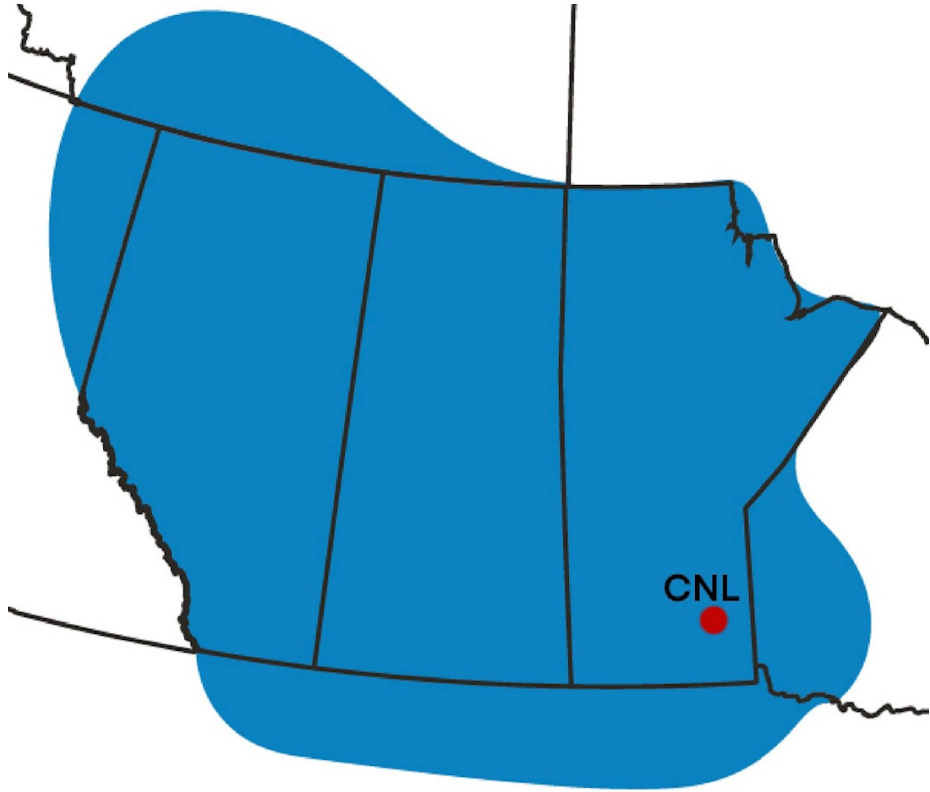


Overview

- General Comments
- Review Approach
- 2022 Regulatory Oversight Report – WL Compliance Evaluation
 - Concerns with Security SCA at the WL
 - Concerns Regarding Waste Management and Record Keeping at WL
 - Concerns Regarding Fire Protection Program at WL
 - Continued Role of AECL at WL
- Conclusions



General Comments



- Whiteshell Laboratories (WL) site is located on Métis Recognized Harvesting Area
- Red River Métis Citizens use the lands and waters surrounding the WL site for harvest and exercise of rights
- Red River Métis were not adequately consulted prior to the development of the WL site
- The Manitoba Métis Federation (MMF) has great interest in long-term stewardship of the WL site, transitioning the site for future beneficial use by Red River Métis Citizens



Review Approach

- The MMF with support from Shared Value Solutions (SVS) reviewed the 2022 Regulatory Oversight Report (ROR) to identify:
 - where the Red River Métis' rights, claims and interests may be impacted by the information and findings in the Report;
 - environmental, technical, or regulatory issues with the ROR, and provide recommendations on how Red River Métis' rights and interests may need to be better accommodated;
- Additional analysis was conducted on concerns and recommendations raised in review of the 2018 – 2021 RORs to identify outstanding issues



Security Program

- In 2018, MMF raised concerns about WL's safety program, which was considered "below expectations" in 2018, 2019, and 2021.
- The MMF is pleased CNL has made progress implementing and maintaining its Security program.
- The MMF recognises:
 - Bill C-21 is currently open for public consultation.
 - If passed the Bill would alter provisions and requirements for facilities to acquire, possess, transfer and dispose of firearms, prohibited weapons and prohibited devices.



Recommendations

1. The MMF expects that CNL will adapt the Security Program for WL as needed to maintain compliance with the provisions of *Nuclear Safety and Control Act*, if passed.
2. Appropriate implementation of the *Nuclear Safety and Control Act*, if passed, will be necessary to maintain WL's Satisfactory rating.



Waste Management and Record Keeping

- In October 2022, Notices of Non-Compliance were issued regarding waste management logs and the waste management program overall.
- These were rectified and CNSC now considers these Notices closed.
- Waste management, especially that which is considered hazardous or radioactive is essential to minimize potential risks to the environment, staff, and others who may interact with it.



Recommendations

3. CNL implement appropriate training and programming to ensure the issues do not happen again in the future.
4. CNL follow prescribed measures in ensuring that all waste material is appropriately logged, handled, and disposed of.



Fire Protection Program

In April 2023, CNL identified deficiencies in CNL's Fire Protection Program. This is unacceptable to the MMF.

- Fire Protection Program is one of the more important safety plans in place for WL.
- Fire risk to WL is compounded by the facility's rural location and wildfire risks
- The poor maintenance of the Fire Protection Program draws into question CNL's ability to implement and maintain appropriate administrative oversight for health and safety programming, particularly as decommissioning advances.



Recommendations

5. It is essential that CNL be self sufficient and prepared to respond to fire threats, given the remote, wooded location of WL and limited local resources.
6. CNL demonstrate an ability to reliably maintain appropriate oversight over institutional controls in preparation for, and as an essential component of preserving human and environmental health under a scenario in which in situ decommissioning is conducted.



Role of AECL in WL Oversight

AECL is the owner of WL, as well as any waste products generated, and the liabilities that exist on site.

MMF anticipates that:

- At a point yet undefined following the decommissioning of WL, CNL will relinquish responsibilities for the site back to AECL.
- AECL must remain active in providing direction and oversight for WL



Recommendations

7. In planning for the future, it is essential that AECL remain actively involved in the high-level oversight for WL.
8. Both AECL and CNL ought to act honourably in discharging duties to the Red River Métis, as they relate to operation, decommissioning, and post-decommissioning.
9. CNSC, CNL, and AECL as applicable actively engage with the MMF in identifying a meaningful process for safety performance evaluation post-decommissioning, such that all parties remain assured of the safety and security for WL into the future.



Lifecycle Reporting on Nuclear and Radioactive Materials

Nearly all nuclear material and a large portion of radioactive waste passed through the National Homeland of the Red River Métis. SMEs and location of deep geological waste repository may further increase transport.

Current RORs focus on Packaging and Transportation SCA as a point-to-point transfer, rather than complete lifecycle of materials.

Recommendation:

Need for RORs and annual reporting to evaluate community engagement, communication, and preparedness near appropriate nuclear facilities and along transportation corridors.

