



Oral presentation

Exposé oral

**Written submission from the
Canadian Nuclear Association**

**Mémoire de l'Association nucléaire
canadienne**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories Ltd.

Laboratoires Nucléaires Canadiens Ltée

Application for the renewal of the nuclear
research and test establishment
decommissioning licence for the Whiteshell
Laboratories site

Demande visant le renouvellement du permis de
déclassement d'un établissement de recherche
et d'essais nucléaires pour le site des
Laboratoires de Whiteshell

Commission Public Hearing

Audience publique de la Commission

October 23-24, 2024

23-24 octobre 2024

September 16, 2024

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St.
PO Box 1046 STN B
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Intervention regarding Canadian Nuclear Laboratories application for a 3-year renewal of decommissioning licence for Whiteshell Laboratories site.

The Canadian Nuclear Association (CNA) appreciates the opportunity to intervene in support of Canadian Nuclear Laboratories (CNL) application for a 3-year renewal of its decommissioning licence for Whiteshell Laboratories (WL). The CNA has approximately 100 members, representing over 76,000 Canadians employed directly or indirectly in exploring and mining, uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. Our members are proud of our safety and environmental record, our contribution to Canada's economy and our vital role in the fight against climate change.

The Government of Canada is committed to cleaning up former nuclear research sites around Canada and has provided funding to CNL to do so. CNL is decommissioning WL with the protection of the public, the environment and workers as a top priority. CNL is conducting the work right now rather than leaving it to future generations and to take advantage of knowledgeable staff with extensive experience of the WL site.

WL is a research campus that consists of legacy Class B nuclear facilities, laboratories and waste management areas developed by Atomic Energy of Canada (AECL) in the 1960's. Most research programs were discontinued in 1997 and AECL began the transition from operations to decommissioning. CNL took over as the site licence holder in 2015.

CNL is decommissioning WL to restore and protect the environment for generations to come. By the end of the decommissioning process, all buildings on site will be completely removed, all hazardous materials properly dealt with, and any contaminated lands cleaned up to safe levels. When the restoration is complete over 10,800 acres of land will remain unaffected and less than 1% of the former site will remain under institutional control. Environmental monitoring will continue for at least 100 years.



During the current licensing period, CNL has made significant progress in decommissioning and restoration activities, environmental protection and compliance improvements. Key accomplishments include:

- The removal of the Active Liquid Waste Treatment Centre
- Continued characterization and environmental assessment of the Whiteshell reactor
- Demolition of the former Biomedical Laboratory facility
- Work on converting the Shielded Modular Above-Ground Storage into a Cask Loading facility
- Initiating waste recovery from low level waste storage bunkers
- Investing in custom designed equipment to support safe waste retrieval from intermediate level bunkers and standpipes

Notwithstanding, the significant accomplishments listed above, CNL faced some serious challenges during the last licence period and has taken steps to address them. Challenges included health and safety considerations related to the COVID pandemic and worker safety and compliance setbacks in the Fire Protection Program. These challenges led to CNL implementing a prolonged COVID site shut down and three work standdowns. These measures demonstrate CNL's commitment to protecting the public, the environment and workers.

During these standdowns, site management focused on staff training and work planning. When a self-assessment revealed procedural compliance issues in the Fire and Emergency Management Program, a root cause analysis was performed and a corrective action plan developed. A comprehensive site re-start plan was developed as well as a House Plan for fiscal year 2024/25. The plan invests heavily in Whiteshell staff and equipment and clearly re-establishes regulatory compliance as the priority over restoration work.

It is important to note that despite the setbacks noted above, CNL maintained a strong safety record, with no public or worker radiation doses exceeding regulatory limits and all radioactive releases below derived release limits. CNL has a solid record of environmental protection based on an environmental protection program that monitors and reports on environmental performance.

In addition to the corrective measures CNL is undertaking, CNSC staff have recommended an additional licence condition that will require CNL to submit reports covering the progress of planned assessment activities, including internal and external audits, inspections, benchmarking and program reviews. This extra layer of regulatory oversight will ensure continued safe operations.

Like all members of the Canadian nuclear industry, CNL is committed meaningful engagement with Indigenous Peoples. Over the past five years, relationships have strengthened and extensive engagement and relationship building efforts have been conducted although it should be noted that it is an ongoing process and relationships with different First Nations are at varying stages of development and maturity. These engagements have provided an opportunity for Indigenous Peoples perspectives and concerns to be integrated into the decommissioning process and environmental protection program.

The Canadian nuclear industry takes its responsibility to clean up and decommission nuclear sites seriously and CNL is at the forefront of that process. CNL has made significant progress over the course of the last licence period and the CNA agrees with CNSC staffs' assessment that "CNL is qualified to carry out the activities authorized by the licence" and that CNL "will make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed"

Therefore, CNA is pleased to support CNSC staff's recommendation that the Commission renew CNL's decommissioning licence for the Whiteshell Laboratories site for a three-year period.

Sincerely,



Steve Coupland

Acting Director, Regulatory Affairs
Canadian Nuclear Association