



Supplementary Information

Renseignements supplémentaires

Presentation from the Canadian Environmental Law Association

Présentation de l'Association canadienne du droit de l'environnement

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, 2024

23 octobre 2024

Whiteshell Laboratories

2024 CNL APPLICATION FOR SITE LICENCE RENEWAL
CELA Comments

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Present situation at WL

Whiteshell Laboratories in a shutdown state where only essential compliance and maintenance work can be carried out plus three work stand-downs “ ... necessary to ensure protection of the public, the environment, and staff”

CNSC's Regulatory Oversight (initial report) disclosed the following during 2020, 2021, 2022

- *“serious deficiencies in fire and emergency training,*
- *serious deficiencies in equipment inspection,*
- *lack of testing of personal protective equipment*
- *lack of maintenance of personal protective equipment and*
- *incomplete/expired personal protective equipment.”*

CNSC's full CMD -28 report added the following shortcomings

- *“unavailability of firewater pressure and flow*
- *unavailability of fire hydrants*
- *non-maintenance of sprinklers*
- *non-testing of sprinklers and*
- *non-testing of emergency lighting in buildings.”*

Should CNL be granted an extension of their site licence at WL?

Serious Problem of Poor Safety Culture at WL

Need to tackle this at CNL Board level

CELA recommends (inter alia)

Commission to require, in any future licence,

- CNL appoint a senior health and safety Director
- CNL draw up a written policy on health and safety matters with emphases on finance
- CNL introduce a site safety committee chaired by the Board H&S Director
- CNL introduce safety representatives among the workforce with paid time off work for safety functions, and
- CNL incentivise safety among its directors

Missing Reports

- Table 5 (last four rows) states that four inspection reports for 2024 are "*forthcoming*". These include a report on Emergency Management and Fire Protection. (see pp 64, 65 of CMD 24-H7.1). To date only one has been made available.
- further report from CNL which is expected shortly on the series of safety shortcomings self-reported to the Commission in 2023 and 2024.