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**Written submission from the  
Canadian Nuclear Association**

**Mémoire de l'Association  
nucléaire canadienne**

**Canadian Nuclear Laboratories**

Regulatory Oversight Report for  
Canadian Nuclear Laboratories Sites:  
2023

**Laboratoires Nucléaires Canadiens**

Rapport de surveillance réglementaire  
des sites des Laboratoires Nucléaires  
Canadiens : 2023

Commission Meeting

Réunion de la Commission

**November 7, 2024**

**7 novembre 2024**

October 3, 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 the 2023 Regulatory Oversight Report for Canadian Nuclear Laboratories.**

The Canadian Nuclear Association (CNA) is pleased to have the opportunity to comment on the 2023 Regulatory Oversight Report (ROR) for Canadian Nuclear Laboratories. The CNA has approximately 100 members, representing over 89,000 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 CNA notes that the ROR for CNL covers multiple sites involving a wide range of activities not the least of which is implementing the Government of Canada's commitment to cleaning up former nuclear research sites. This is challenging and innovative work and CNL is at the forefront of Canada's initiatives. In addition, CNL remains Canada's leading nuclear research and development organization with many new and innovative initiatives. The wide range of activities within CNL's scope make it a unique and critical organization within Canada's nuclear industry.

In 2023, CNSC staff conducted 33 inspections across CNL sites which resulted in 119 notices of non-compliance. Most of these have subsequently been closed and CNL has an appropriate corrective action plan in place for the remaining notices. None of the non-compliance notices posed a risk to the health and safety of the public or the environment.

All sites were evaluated across the 14 Safety and Control Areas (SCA) and all SCAs were rated as satisfactory except for human performance management and emergency management and fire protection at the Whiteshell site. A self-assessment of the fire protection program at Whiteshell revealed deficiencies in training records for on-site fire brigade members and incomplete equipment procedures. CNL reported these findings to the CNSC and took immediate action by putting the plant into a safe stand down state, performing a root cause analysis and developing a corrective action plan. CNA is confident that these actions will result

in an upgraded assessment in next year's ROR. CNA would note that the one SCA rated below expectations in 2022 was rated satisfactory in 2023.

CNA believes that it is important to note that despite the below expectation ratings in two categories at one site, CNL continued to operate with an unwavering commitment to safe, compliant and transparent operations. CNL maintained a strong safety record in 2023 with just 7 lost time accidents reported in 2023 and with no public or worker radiation doses exceeding regulatory limits and all radioactive releases below derived release limits. CNL continuously assesses its programs and takes immediate actions to enhance safety.

Like all members of the CNA, CNL is committed to developing an ongoing relationship with Indigenous Peoples and providing opportunities for meaning engagement in all the communities it operates in. CNA was pleased to see that CNSC staff recognized CNL's ongoing engagement activities and outreach programs. CNL is committed to healing and reconciliation and will continue to strive for consensus and Indigenous engagement in its projects.

In addition, CNL has a fleet wide Public Information and Disclosure Policy which ensures the timely disclosure of information to the public relating to health, safety and security of people and the environment and ongoing and upcoming operations across all its sites. CNA was pleased to see the positive acknowledgement of CNL's commitment to public communications in the 2023 ROR.

In conclusion, CNA agrees with CNSC staff's conclusion that CNL's sites operated in safely in 2023 and that CNL continues to protect the health safety and security of workers, the public and the environment across its many sites and operations.

Sincerely,



**Steve Coupland**

Acting Director, Regulatory Affairs  
Canadian Nuclear Association