CMD 24-M16.3A

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Supplementary Information

Renseignements supplémentaires

Presentation from the Manitoba Métis Federation

Présentation de la la Fédération des Métis du Manitoba

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



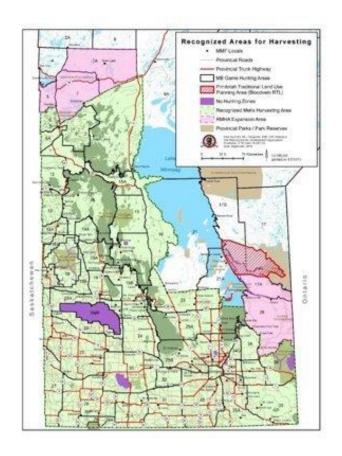
Manitoba Métis Federation

2023 Regulatory Oversight Report for Canadian Nuclear Laboratories Sites

Key Issues and Concerns



Manitoba Métis Federation



- Whiteshell Laboratories (WL) site is located within the National Homeland of the Red River Métis.
- 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.

Whiteshell Laboratories Safety Program

- The MMF is pleased to see that CNL has made significant progress as it relates to the implementation and maintenance of its Security program for Whiteshell Laboratories.
- The MMF expects that CNL will adapt the Security Program for Whiteshell
 Laboratories as appropriate to maintain compliance with the provisions of *Nuclear Safety and Control Act* and ensure Whiteshell Laboratories maintains its
 Satisfactory rating.



Radiation Protection

- The MMF is pleased that WL continues to maintain a high standard for radiation protection for its workers with no action levels reported in 2023.
- We acknowledge that as Whiteshell Laboratories continues to engage in decommissioning activities the on-site risks should continue to decline but this maintained regulatory standard and zero contamination incidents helps to alleviate the concerns of the MMF related to radiation risk to Red River Métis Citizens.



Human Performance Management

- Four Notice of Non-Compliances were issued to Whiteshell Laboratories in 2023 related to:
 - outdated training documentation and requirements
 - inaccurate training records
 - limited access to training records by supervisors
 - inconsistent training program evaluations
- Issues in Emergency Management and Fire Protection resulted in WL falling below minimum staffing that requires the presence of sufficient qualified workers to carry on activities safely.

Emergency Management and Fire Protection

- In 2023, CNL was issued 10 Notices of Non-Compliance and was charged for failing to comply with their Nuclear Research and Test Establishment Decommissioning Licence condition for implementing and maintaining a fire protection program.
- The MMF deems this continued lack of due diligence as unacceptable.
- The MMF emphasizes that the delivery and maintenance of administrative or institution controls for Fire Protection must be rectified and maintained in the highest order for the protection of generations to come.

Continued Role of AECL in Whiteshell Laboratories Oversight

- It is essential that AECL remain actively involved in the high-level oversight for Whiteshell Laboratories. As owner of Whiteshell Laboratories and all generated waste products, AECL holds Crown duties to the MMF.
- The MMF requests that CNSC, CNL, and AECL, actively engage with the MMF in identifying a meaningful process for safety performance evaluation postdecommissioning, such that all parties can remain assured of the safety and security for Whiteshell Laboratories into the future.



Lifecycle Reporting of Nuclear and Radioactive Material

- The MMF is concerned about potential gaps that exist when considering how the safe management, handling, and control of nuclear and radioactive materials takes place throughout the life-cycle.
- Currently there is a lack of transparency in how the CNSC reports on lifecycle oversight of nuclear substances and radioactive wastes.
- The MMF seeks to better understand the impacts and risks of all nuclear and radioactive material that reside within and passes through the National Homeland.



Commitment to Long-Term Safety Culture

- Since 2019, Whiteshell has had a series of safety and security compliance and performance setbacks.
- Whiteshell, in advancing towards decommissioning and reclamation will undertake several activities of elevated risk (e.g., decommissioning of WR-1), leading to transition to post-closure.
- CNL must demonstrate an ability to maintain effective oversight and compliance to prepare for Whiteshell site transitions.