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Written submission from the Nuclear Transparency Project

Mémoire du Projet de transparence nucléaire

Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities, Research Reactors, and Class 1B Accelerators in Canada: 2023

Rapport de surveillance réglementaire des installations de traitement de l'uranium et des substances nucléaires, les accélérateurs de particules de catégorie IB au Canada: 2023

Commission Meeting

Réunion de la Commission

February 26, 2025

Le 26 février 2025

Canada

nuclear transparency project

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Submitted via email

January 11th, 2025

To President Tremblay and Members of the Canadian Nuclear Safety Commission,

Re: Canadian Nuclear Safety Commission Staff's Regulatory Oversight Report on Uranium and Nuclear Substance Processing Facilities in Canada: 2023

We would like to begin by thanking the Commission for this opportunity to provide comments on this Regulatory Oversight Report (ROR). We would also like to recognize the efforts of Canadian Nuclear Safety Commission (CNSC) staff, Canadian civil society organizations, and Indigenous Nations for their informative publicly available materials and submissions on this matter.

NTP is also grateful for the comments in writing by CNSC staff in response to the information requests, submissions, and recommendations that constituted our ROR intervention from last year. Further, we would like to thank the CNSC staff who shared with us machine-readable formats of the ROR's data tables from last year. This has allowed us to begin an internal database for this category of licensee that will help to inform future interventions and public resources on our website. We deeply appreciate the time and attention this required from CNSC staff.

About NTP

The Nuclear Transparency Project (NTP) is a Canadian-registered not-for-profit organization dedicated to supporting open, informed, and equitable public discourse on nuclear technologies. NTP advocates for robust public access to data and other types of information and helps to produce accessible analysis of publicly available information, all with a view to supporting greater transparency in the Canadian nuclear sector. NTP is comprised of a multi-disciplinary group of experts who work to examine the economic, ecological, and social facets and impacts of Canadian nuclear energy production. We are committed to interdisciplinary, cross-sectoral, and equitable collaborations and dialogue between regulators, industry, Indigenous nations and communities, civil society, members of host and potential host communities, and academics from a variety of disciplines.

About this intervention

NTP's intervention was made possible by CNSC funding through its Participant Funding Program (PFP). These submissions were drafted by NTP founder and coordinator Pippa Feinstein, JD LLM in collaboration with biologist Dr. Tamara Fuciarelli, data analyst and engineer Alan Rial, M. Eng., and student researcher Alexandra Chernoff.

Our submissions have been divided into three parts: the first part contains a review of the current ROR; the second part addresses and builds on our previous recommendations to increase the amount of publicly accessible data collected and disclosed by uranium and nuclear substance processing facilities facilities; and the third part contains recommendations relating to procedural or administrative aspects of these ROR proceedings.

PART ONE: NTP's review of the ROR

This ROR has the most information and data of any RORs. Its appendices are especially helpful, providing a meaningful and accessible public resource. NTP also appreciates the new standardized format of RORs this year. This new format is easier to navigate than previous RORs and will facilitate easier comparison between this year's ROR and future RORs for uranium and nuclear substance processing facilities. The new standardized format will also assist with future comparisons between RORs for different licensee categories each year. These changes will further improve both the accessibility and public utility of these annual reports.

For the last two years, however, NTP has recommended that CNSC staff amend their description of the Independent Environmental Monitoring Program (IEMP) in RORs and other CNSC materials.[1] We have requested that explanations of the IEMP specify that the program is meant to address specific community concerns by providing data 'snap-shots' of ecosystem components around nuclear facilities. We have noted how the purpose and methodology of the IEMP means it cannot provide comprehensive analysis of overall environmental health or trends in local environmental conditions – sampling is done too infrequently, and is too geographically selective and spaced out, to do this.

The IEMP has been the subject of a past CNSC-ENGO Forum meeting in 2023, where the limitations of the IEMP were discussed in more detail. NTP shared its recommendations with CNSC staff at that meeting, and the relevant subject matter experts responsible for managing the IEMP provided a table that described the Program's scope, distinguishing what IEMP data could and could not communicate. Since then, NTP also received a written response from CNSC staff responsible for drafting this ROR. In that response, staff noted the limitations of the IEMP, agreeing it provides "snapshots" in time of certain environmental conditions around nuclear processing sites, rather than

[1] This recommendation is also thus applicable to all RORs, not just this one.

comprehensive trends in environmental conditions.[2] Despite these developments, NTP notes that the description of the IEMP in this year's ROR is again relatively unchanged from the description used three years ago.

NTP again proposes that CNSC staff amend their descriptions of the IEMP in future RORs to more transparently convey the Program's narrower purposes and limitations. If there is any barrier to doing so, we ask that this be explained by CNSC staff so that we can better understand this issue.

Recommendation 1: that CNSC staff implement the proposed IEMP communications presented during the 2023 CNSC-ENGO Forum presentation materials, or else comment on potential barriers to its implementation.

Another example of an area in which more information should be included in the ROR, in order to facilitate greater public understanding and transparency, relates to reportable events and instances of licensee non-compliance. While descriptions of non-compliances and reportable events in this ROR tend to be more detailed and consistent than in other RORs, we offer two recommendations below for further improvement.

Recommendation 2: for identified non-compliances, NTP recommends that future RORs include descriptions of the nature of the non-compliance, their cause, explain their significance (with any associated data values in the case of resulting environmental or dose releases), and explain whether or how the non-compliance is resolved.

Recommendation 3: for release events, NTP recommends future RORs share the following information:

a. *The date, time, and duration of the event;*
b. *Location of the event;*
c. *Any measured releases to the environment on- and/or off-site. Here, concentration and/or activity (preferably in sieverts or grays in addition to becquerels) and volumes should be provided. If no measurements are taken, reasons for this should be provided along with estimated release concentrations and volumes;*
d. *Relevant licence limits, i.e. facility-specific action levels, derived release limits as well as applicable regulatory environmental standards or release limits; and*
e. *A description of any mitigation and follow-up monitoring efforts, including any available monitoring data.*

[2] Correspondence from CNSC staff to NTP, "CSNC response to Nuclear Transparency Project information requests for the Regulatory oversight report for uranium and nuclear substance processing facilities in Canada: 2022", March 7, 2024, at p 3, March 7, 2024, Appendix A to these submissions.

PART TWO: NTP's review of publicly accessible data for generating facilities

For the last two years, NTP has recommended that groundwater and stormwater data be disclosed via the Open Government data portal. Last year, NTP augmented this recommendation to include a request for the proactive disclosure of sampling results of ambient surface water, ambient air, releases to sewers, soil, and sediment to the Open Government data portal. CNSC staff have since responded to this recommendation in writing, noting they are planning to upload this additional environmental data to the Open Government portal. Staff noted however, that "[d]eveloping these databases will take time because of quality assurance/quality control reviews and formatting the databases to meet the Open Government portal's accessibility and language requirements."[3] Our organization inquired about when we might expect this additional disclosure, but CNSC staff were unable to provide a timeframe for this further disclosure.

Recommendation 4: that CNSC staff provide a rough timeframe (e.g. months or years) for when the public may expect data on the Open Government portal relating to groundwater, stormwater, ambient surface water, ambient air, releases to sewers, soil, and sediment conditions at uranium and nuclear substance processing facilities.

Last year, we also inquired with CNSC staff about whether additional data could be uploaded to the Open Government portal concerning non-power reactors. CNSC staff noted that they were planning to upload this information to the Open Government portal in the future.[4] This was also confirmed in Appendix G to this year's ROR. NTP appreciates the commitment to additional environmental data disclosure, and would again benefit from a rough timeframe (e.g. months or years) for when CNSC staff hope to upload this data.

Recommendation 5: that CNSC staff provide a rough timeframe (e.g. months or years) by which the public may expect data on the Open Government portal relating to non-power reactors.

PART THREE: NTP's recommendations for future ROR intervention processes

Two years ago, NTP had requested more time to prepare our ROR interventions. Last year and this year, the CNSC responded by increasing the amount of time between funding decisions, ROR publication, and the final due dates for intervenors' written submissions. The consistency between these new timelines from year to year is also helpful as it allows our organization to effectively plan how it will undertake its funded work and coordinate tasks between its different contributors.

[3] Correspondence from CNSC staff to NTP, "CSNC response to Nuclear Transparency Project intervention on the Regulatory oversight report for uranium and nuclear substance processing facilities in Canada: 2022", March 7, 2024, at p 1, Appendix B to these submissions.
[4] Correspondence from CNSC staff to NTP, "CSNC response to Nuclear Transparency Project information requests for the Regulatory oversight report for uranium and nuclear substance processing facilities in Canada: 2022", March 7, 2024, at p 3, March 7, 2024, Appendix A to these submissions.

We inquired about the later dates for this intervention and the one concerning the ROR for nuclear generating facilities this year and were told by the Registry that it was due to a heavy hearing load at the end of 2024 which pushed these two RORs later into 2025. We understand that next year, ROR meeting schedules will return to their usual timeframes. This would be most appreciated and assist us with the necessary preparations for those interventions, should we be granted funding to intervene again at that time.

Recommendation 6: that timeframes for ROR interventions continue to provide at least 10 weeks between funding decisions and final submission due dates; at least 6 weeks between the publication of RORs and final submission due dates; and that these dates for each step of the ROR process remain consistent from year to year.

In previous years, NTP has requested the ability to present oral submissions at Commission meetings to consider RORs. This used to be an automatic aspect of ROR interventions, but in recent years has only been extended to intervenors when RORs coincide with mid-term licensing updates from specific facilities. With longer licence terms being approved for nuclear facilities over the last few years, and smaller panels of CNSC Commissioners being convened for licensing hearings, opportunities for civil society organizations to engage with Commissioners has become increasingly limited. This is despite the fact that interacting with Commissioners during meeting and hearing proceedings has the potential to significantly improve the quality of engagement with intervenors' submissions, offering more opportunity for mutual learning and increased familiarity with organizations' advocacy priorities and the CNSC's mandate and approach to related issues. As such, NTP recommends a return to the practice of permitting intervenors to present oral submissions before Commissioners during ROR proceedings.

Recommendation 7: that opportunities to make oral submissions be extended to all intervenors, ensuring more meaningful opportunities to contribute to the public record for these ROR proceedings.

Nuclear Transparency Project information request to assist with NTP on its intervention on the *Regulatory oversight report for uranium and nuclear substance processing facilities in Canada: 2022*

CNSC Staff review and responses.

Nuclear Transparency Project Letter, October 2023, eDoc 7165084
UNSPF ROR 2022

PART ONE: Follow up on Sept 22, 2023 meeting

Question 1: Thank you for explaining the different units for reporting radioactivity in non-human biota. You noted during our meeting that in situations such as certain unplanned releases or accidents or ERAs, you can use special software that allows for modelling to be done to determine radioactivity exposures to non-human biota expressed in Sieverts and Grays. How difficult would it be to more frequently report routine exposures to nonhuman biota Sieverts and Grays in the environment (i.e. in terms of equipment/software costs and training or staff time)?

Response:
Exposures to non-human biota is evaluated in the licensee's environmental risk assessment (ERA). The ERA evaluates potential impacts to non-human biota and to critical receptors when the facility is releasing their maximum predicted release to the environment, using specialized modelling software. Therefore, during normal operations, where releases are below the maximum predicted release, there are no expected impacts to non-human biota and to critical receptors. Therefore, CNSC staff do not require licensees to report routine exposures to nonhuman biota in the environment.

In order for CNSC staff to do their own modelling, CNSC staff would need to reconstruct licensee ERA and derived release limit scenario files within a contaminant transport computer model. This would then serve as an input to the specialized modelling software that is used to estimate exposures to non-human biota. This would require a high level of effort by CNSC staff.

CNSC staff have no plans to request this of licensees, nor undertake this type of modelling on a routine basis for the purposes of the ROR.

Question 2: We appreciate how your ROR has the most data of any ROR report produced by CNSC staff. How difficult would it be to release this data in machine-readable formats e.g. CSV or the original formats presumably used by CNCS staff compiling the data before it is converted to PDF in the final published report)?

Response:
Currently, CNSC staff transcribe environmental data from the licensee's annual compliance reports into excel spreadsheets and will provide the excel spreadsheets to NTP for the 2022 ROR.

For future RORs, this data can be provided upon request.

Question 2a: Have you had discussions with licensees covered by this ROR relating to more proactive data disclosure? If so, have any of these discussions also included the possibility of routine releases of sampling data with maps and monitoring locations?

Response:
The licensees provide environmental data to the CNSC to satisfy the requirements set out in their license. If there is a specific format or further information being requested, that request should be made directly to the licensee.

Question 2b: What are potential or real barriers to greater data disclosure at the moment? Both on your end as the regulator, and on licensees' ends if/when you speak with them about this?

Response:
The environmental data that CNSC has is largely pulled from licensee annual compliance reports (pdf), which are publicly available on the licensee websites. It would be ideal if the licensees could provide their environmental data in a more accessible format (eg. CSV).

REGDOC-3.2.1 *Public Information and Disclosure*, sets out requirements and guidance for public information and disclosure for licensees and applicants of Class I and Class II nuclear facilities, and uranium mines and mills, for all lifecycle phases. REGDOC-3.2.1 is currently under review and the team is analyzing topics such as data disclosure. There will be an opportunity for feedback during the formal public consultation stage.

As for providing the data that CNSC staff have in excel format, or for posting on the Open Government Portal, barriers include conducting quality assurance/quality control checks on the database and formatting the databases in order to meet the Open Government Portal's accessibility and bilingual requirements.

Question 3: We are still trying to better understand what reported uranium loadings communicate. Are they predominantly compounds or mixtures that are released (e.g. UF6, UO2)? And yellowcake? (we understand this may differ depending on the licensee).

Response:
The releases of uranium compounds and what specific form the uranium is in will vary from facility to facility due to the different facility operations. First, SRBT, Nordion, BWXT Medical, and Best Theratronics are covered in this Regulatory Oversight Report but their operations do not include uranium so there are no releases of uranium from these facilities. The following is a summary of the uranium processing facilities and the uranium compounds they process:

- The Blind River Refinery facility receives yellowcake (uranium concentrates) and refines it to produce uranium trioxide (UO_3)
- Port Hope Conversion facility receives uranium trioxide (UO_3) from Blind River Refinery and refines it to produce uranium dioxide (UO_2) and uranium hexafluoride (UF_6)
- Cameco Fuel Manufacturing receives uranium dioxide (UO_2) from the Port Hope Conversion Facility and produces fuel pellets and fuel bundles
- BWXT Toronto also receives uranium dioxide (UO_2) from the Port Hope Conversion Facility and produces fuel pellets
- BWXT Peterborough receives fuel pellets from BWXT Toronto and produces fuel bundles

These facilities have different regulatory limits in place for uranium releases in air and water. Uranium is monitored from these facilities according to their individual environmental protection plans as total uranium in kilograms or grams. The individual compounds of uranium are not required to be quantified by the facilities in part due to the complex uranium chemistry in the environment and because they would be captured by the total uranium. Finally, measuring total uranium is in alignment with federal guidance (Health Canada's guidance: Guidelines for Canadian Drinking Water Quality Guideline Technical Document - Uranium - Canada.ca).

PART TWO: Follow up from CNSC responses to NTP recommendations on 2021 ROR

Question #1: We appreciate the note and commitment you make in this year's ROR to continue to engage with our organization (on p 42). At the same time, we also noted that no specific responses or commitments in relation to our submissions from last year were included in this year's report. Are there any feasibility concerns with having all intervenors' issues and recommendations from each year tracked in future RORs? This way they can supplement the ROR public record from year to year.

Response:
We are in the process of drafting the template for the 2023 ROR and are considering adding themes from all intervenors in the appendix. In addition, we are considering noting the actions that have arisen from intervenor recommendations. Please also see CNSC staff's response to NTP Recommendation #1 on the 2022 ROR.

Question #2a: The IEMP description is still a concern. We note the undertakings made at the CNSC-ENGO Forum, including the addition of a table (already drafted) to accompany IEMP descriptions that distinguish what IEMP data can provide/address and what it cannot. Why was this not included in this year's description of the IEMP? Will it be included in next year's description?

Response:
In this year's ROR, CNSC staff have updated the IEMP description to reflect the revised objective. It should be noted that the ROR provides a high-level summary of the IEMP. More details about the program are available on the CNSC IEMP website. The limitation of the IEMP data is addressed in the text where it is stated that the IEMP results add to the body of evidence and support CNSC staff's assessment. In future RORs, CNSC staff will look for continuous improvements on how IEMP-related information is described.

Question 2b: We recognize your commitment to including groundwater and stormwater data via the Open Data Portal in the near future. Can you provide a better sense of potential timeframes for having this data uploaded for public access?

Response:
The CNSC does not have a timeframe for when groundwater and stormwater data will be available on the Open Government portal. The CNSC is hopeful to have the data available in the next couple of years. In the meantime, NTP is encouraged to contact the licensees directly to obtain the information.

Question 3: If non-power reactors (McMaster University, Royal Military College of Canada, École Polytechnique de Montréal) are included in this category of licensee, why is no data reported for them in the ROR or on the Open Government data portal for radionuclides? Even if these licensees are only meant for inclusion in every third ROR, are oversight activities and inspections uniformly conducted annually?

Response:

There is no data available yet on the Open Government Portal for non-power reactors because from an environmental protection perspective, these facilities have negligible releases to the environment. Therefore, they are considered low risk facilities. The priority to date has been uploading effluent and emissions data from higher risk facilities. In a future update, emissions data from non-power reactors will be included.

Oversight activities and inspections are determined by the risk profile of the facility and are conducted irrespective of the ROR cycle. In 2024, the UNSPF ROR will include regulatory oversight activities and inspections covering the calendar years of 2021, 2022, and 2023 for the three non-power reactors.

PART THREE: Information requests for 2022 ROR

Question #1: Can more information be shared about the external complaint from a PHCF employee that triggered a subsequent written notice to PHCF, and their attempts to prevent the CNSC staff investigation? (p. 41) Has anything like this happened with this licensee in the past?

Response:
Details of the external complaint are confidential and as such, we cannot comment on whether or not similar concerns have been brought up in the past. Further details on the external complaint process can be found on the CNSC website. Please note that you have referred to the external complaint as being from a PHCF employee. As mentioned earlier, details of the external complaint are confidential and CNSC has not provided any additional information on this matter.

Since the warning letter was issued in 2023, it will be covered in the 2023 ROR. For the latest information on this matter, we would refer you to CNSC staff's presentation on the ROR from December 13, 2023. To date, CNSC staff are satisfied that Cameco has undertaken appropriate corrective actions in response to the warning letter.

Question #2: On p 71 of the ROR, it notes only one of four fence line sampling locations has an AL. Why is this? This is specially of interest as the location that has the AL exhibits the lowest contamination levels.

Response:
The Blind River Refinery is located on property owned by Cameco Corporation. The nearest location where the public has access is the golf course which is located north of the facility. This is also the location of the critical receptor for calculating dose to the public. This is why only the north fenceline sampling location has an action level for gamma. The other locations can have higher gamma values because they are located closer to the uranium concentrate storage pad along the west fence. Since the public does not have access to the other three locations, no action levels are required. Despite there not being an action level at such locations, CNSC staff review all the data for to look for trends.

Question #3: Can you share the methodologies and/or REGDOCs CNSC staff use to determine how often the averaging of sampling results can be conducted and reported in a given scenario? (i.e. what determines whether daily, weekly, or monthly averages are required for particular parameters by the regulator?)

Response:
Section 7.7 of CSA N288.5 *Effluent and Emissions Monitoring Program at Nuclear Facilities* contains guidance to determine the sampling frequency of monitoring effluent and emissions. Licensees and proponents use this standard to design their effluent and emissions monitoring program. They propose and justify the monitoring frequency and CNSC staff review the justification.

Question #4: Why are total releases to sewers not provided in a table for the Port Hope Conversion Facility in this year's ROR, while they are for other facilities such as the Cameco Fuel Manufacturing facility? Given the issues with contaminated groundwater infiltration of the sewer infrastructure at the Port Hope Conversion facility, this is a situation where further disclosure of monitoring data would be in the public interest.

Response:
Cameco Fuel Manufacturing and Port Hope Conversion Facility (PHCF) are different facilities with different operations and different conditions in their operating licences. In the case of Cameco Fuel Manufacturing, process effluent is released directly to the sewer. For PHCF, it collects and evaporates its process water effluent and does not discharge its process wastewater effluent to the sanitary sewer. The reason why this facility does not report on their total releases to sewers is because there are none. PHCF does discharge non-process liquid effluent (e.g., facility domestic contributions, boiler blowdown from the Powerhouse, and contributions from facility showering facilities) and monitors several discharge points, as required in their licence, including their sanitary sewer. The action level exceedances for uranium in PHCF's sanitary sewer network are not related to PHCF's process water discharge because they do not discharge their process waters to the sanitary sewer. The action level exceedances have occurred due to the poor condition of PHCF's sewer network. Due to the aging system, heavy rain events cause an increased volume of groundwater to come into contact with historic low-level contaminated soil on site. This volume of contaminated groundwater then infiltrates the aging sanitary sewer network, where PHCF monitors for contaminates including uranium, and this results in AL exceedances. Cameco is rehabilitating the entire sewer network through the Vision in Motion project, which should reduce groundwater infiltration into the sanitary sewer network.

CSNC response to Nuclear Transparency Project intervention on the *Regulatory oversight report for uranium and nuclear substance processing facilities in Canada: 2022*

UNSPF ROR 2022
NTP Intervention

PART ONE: NTP's review of the ROR
Recommendation 1: that CNSC staff and Commissioners consider including CNSC staff responses to individual intervenor comments from the previous year in each new ROR. **Response:** CNSC staff review and disposition each intervention internally, and we have committed to providing the Nuclear Transparency Project with a written disposition of their intervention as well as a written disposition of an information request that was received alongside the intervention. In CNSC staff's dispositions, NTP can see how their specific recommendations have been considered. This was done as well for their intervention on the 2021 ROR. As for including a disposition table in the ROR CMD, this is not something that we currently envision. For example, with Indigenous Nations and Communities, we've provided a summary in an Annex regarding the issues raised, but not detailed disposition tables. Instead we have separate issue trackers with each Nation for disposition purposes. We envision summarizing the previous interventions received by NTP and others in next year's ROR. To provide the written disposition of all intervenor comments in a ROR CMD is resource intensive, especially given translation requirements. In response to the comment on the IEMP in relation to Recommendation 1: The IEMP description in the 2022 ROR was updated to reflect the revised objective. The IEMP is the CNSC's initiative, not a replacement for the licensee's monitoring program. We consider the IEMP complimentary to compliance, it is not a compliance verification activity such as an inspection but can be used to inform compliance activities. Since we do not monitor every site every year, the IEMP is considered a snapshot in time. It is not baseline sampling or environmental characterization. The IEMP encourages Indigenous nations and communities and the public's participation and involvement, but it is not a community-based monitoring program. The IEMP is looking towards establishing a process for engaging with members of the public, in the meantime, the IEMP is always appreciate of feedback via the CNSC info line.
PART TWO: NTP's review of publicly accessible data for facilities covered by the ROR
Recommendation 2: that groundwater, stormwater, ambient surface water, ambient air, releases to sewers, soil, and sediment data be uploaded routinely to the Open Government data portal **Response:** CNSC staff plan to upload these types of environmental data in a future update on the Open Government portal. Developing these databases will take time because of quality assurance/quality control reviews and formatting the databases to meet the Open Government portal's accessibility and language requirements.

Recommendation 3: that CNSC staff comment on the feasibility of sharing tables from the ROR with members of the public in CSV formats.

Response:
CNSC staff will provide NTP with the environmental data from the 2022 ROR in excel.

PART THREE: NTP's recommendations for future ROR intervention processes

Recommendation 4: that the CNSC's PFP develop more specific and expansive intervenor funding criteria, in consultation with members of the public and public interest organizations.

Response:
All project-specific funding applications under the CNSC's Participant Funding Program (PFP) are reviewed by a Funding Review Committee (FRC) that is independent of the CNSC. The FRC reviews all applications and makes recommendations on how to divide the limited amount of available funding between applicants and what each applicant's funding objectives should be. The criteria used by the FRC when evaluating applications is consistent with the criteria used by other PFPs across the federal government. The criteria can be found on the CNSC's website as well as the publicly available PFP Guide, and all CNSC funding decisions are posted on the CNSC website.

As all PFP funding opportunities are to support participation in Commission proceedings, the scope of the activities and studies that can be funded is limited by the scope of what the Commission must consider at a proceeding. The scope of Commission proceedings is specified in both the proceeding and funding announcements that are posted on the CNSC website. Over the past year, CNSC staff have met with NTP to discuss their specific concerns around the criteria and are always available to answer any questions from applicants on the application process.