



Update from CNSC Staff

Mise à jour du personnel de la CCSN

Follow up from 2018 Public Hearing on Licence Renewal for OPG Pickering Nuclear Generating Station

Suivi à la suite de l'audience publique tenue en 2018 pour le renouvellement du permis d'OPG pour la centrale de Pickering

Update from CSNC Staff on the Decision regarding the inclusion of radionuclides as a chemical of mutual concern under the Great Lakes Water Quality Agreement (Action Item #19575)

Mise à jour du personnel de la CCSN sur la décision relative à l'ajout des radionucléides comme produits chimiques sources de préoccupations mutuelles aux termes de l'Accord relatif à la qualité de l'eau dans les Grands Lacs (Suivi # 19575)

Commission Meeting

Réunion de la Commission

January 29, 2025

Le 29 janvier 2025



MEMORANDUM / NOTE DE SERVICE

To Candace Salmon
A Commission Registry

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From 2024-12-17
De
X DBeaton

Signed by: Beaton, Dana

Subject RIB Action #19575 – Update on Decision on Radionuclides as Chemicals of Mutual Concern
Objet

ISSUE

During the Pickering Nuclear Generating Station relicensing hearing in 2018, the Commission requested comments from Canadian Nuclear Safety Commission (CNSC) staff and Environment and Climate Change Canada (ECCC) on the nomination of radionuclides as Chemicals of Mutual Concern (CMCs) under the Great Lakes Water Quality Agreement (GLWQA). These discussions were summarized in Paragraph 414 of the Pickering Licence Renewal 2018 Record of Decision with a request that the Commission be updated on the decision made by ECCC on the nomination.

To date, five updates have been provided to the Registry, in 2019, (e-Doc: 6067323), 2020 (e-Doc: 6443947), 2021 (CMD 22-M8), 2022 (CMD 23-M6), and 2023 (CMD 24- M9), all indicating that no decision had been made by ECCC on the nomination.

This memo provides a sixth update for RIB Action #19575.

The GLWQA is an agreement between Canada and the United States of America (U.S.), first signed in 1972 and amended in 2012 with inclusion of [Annex 3: Chemicals of Mutual Concern](#). A key objective of this Annex is to identify CMCs from anthropogenic sources that both countries agree to being potentially harmful to human health or the environment. The Canada Water Agency¹ (CWA) leads the implementation of the Agreement for Canada while the U.S. Environmental Protection Agency (EPA) leads U.S. activities under the Agreement.

¹ Previously, Environment and Climate Change Canada (ECCC) led the implementation of the Agreement for Canada. The CWA was [established in October 2024](#) as a standalone federal entity, and at that point responsibility for coordinating Canada’s implementation of the GLWQA moved from ECCC to the CWA.



One way that chemicals can be considered as CMCs is through being nominated by external stakeholders. Following this process, in 2016, a group of 110 stakeholders led by the Canadian Environmental Law Association (CELA) and the Toxics-Free Great Lakes Binational Network submitted a [Nomination](#) to designate radionuclides as CMCs under the GLWQA. The CNSC undertook an assessment of the nomination at the request of ECCC. The findings were published in the [2018 CNSC CMCs Assessment](#) which is available on the CNSC website. Likewise, the U.S. Nuclear Regulatory Commission (NRC), at the request of the U.S. EPA, undertook a review of the nomination, and published the [U.S. NRC's Assessment](#) in 2017. Both the CNSC and U.S. NRC concluded that radionuclides are not recommended as candidate CMCs for further evaluation under Annex 3 of the GLWQA. The assessments were posted on [Binational.net](#), which is a shared website for joint work undertaken by the Governments of Canada and the U.S. regarding the GLWQA.

An evaluation of the nomination was put on hold while ECCC and the U.S. EPA worked together to develop a set of binational screening criteria to provide a consistent framework for reviewing nominated CMCs. The formal [Binational Screening Criteria](#) were published in 2021. The criteria were accompanied by a [Guidance Document for Annex 3 Nominations](#) and an [Example CMCs Nomination](#).

Stakeholders that had previously submitted nominations were afforded the opportunity for renomination incorporating the new binational screening criteria. In May 2022, ECCC informed the CNSC of their receipt of a [Renomination](#) for radionuclides by the original nominators, CELA and the Toxics-Free Great Lakes Binational Network. ECCC requested CNSC to review the renomination and provide advice with respect to ECCC's pending decision.

CNSC staff completed their review of the renomination, with a focus on whether any new information was presented that was not addressed in the [2018 CNSC CMCs Assessment](#), and shared their findings with ECCC in August 2023 in a report titled [Evaluation of the Renomination of Radionuclides as Chemicals of Mutual Concern Under the Great Lakes Water Quality Agreement](#). The report determined that the conclusions drawn in the [2018 CNSC CMCs Assessment](#) continue to remain valid, and that radionuclides within the Great Lakes do not pose an unreasonable risk to human health or the environment. Therefore, radionuclides are not recommended as candidate CMCs for further evaluation under Annex 3 of the GLWQA.

The U.S. NRC completed their evaluation of the renomination in October 2023 and provided the report to the U.S. EPA as well as publicly posted it on the [U.S. NRC website](#). The U.S. NRC concluded that radionuclides should not be designated as CMCs under the GLWQA.

UPDATE

In February 2024, the CNSC posted the 2023 report on the external CNSC website; it is hence referred to as [2024 CNSC CMCs Assessment](#). A link to the report on the CNSC website was included on [Binational.net](#) alongside the U.S. NRC's evaluation of the renomination.

Canada and the U.S. anticipate having the criteria-based screening of the renomination completed with a recommendation on whether radionuclides should become candidate CMCs to the [Great Lakes Executive Committee](#) by June 2025.

A further update will be provided to the Commission via memo at the end of 2025.