



CMD 26-H100.2A

Date: 2026-06-17

Supplementary Information

Renseignements supplémentaires

Written Submission from the Concerned Citizens of Renfrew County and Area

Mémoire de Concerned Citizens of Renfrew County and Area

In the matter of the

À l'égard des

Canadian Nuclear Laboratories

Laboratoires Nucléaires Canadiens

Application to amend the licence and licensing basis for the Gentilly-1 Waste Facility

Demande concernant la modification de leur permis et du fondement d'autorisation pour l'installation de gestion des déchets de Gentilly-1

Hearing in writing based on written submissions

Audience par écrit fondée sur des mémoires

July 2026

Juillet 2026

July 2026 Hearing in Writing - Canadian Nuclear Laboratories (CMSC 26-100) - Request to Amend the Licence and the Licensing Basis for Gentilly-1 Waste Facility

Supplementary Submission - Concerned Citizens of Renfrew County and Area

June 17, 2026

Summary and Recommendations

We recommend that:

1. A Waste Management Plan - specific to management of waste arising from Phase 3 - Decommissioning and Demolition activities at the G1WF - be made available for public review and comment prior to further consideration of CNL's licence amendment application.
2. A G1WF *Phase 3 Decommissioning and Demolition Waste Management Plan* be incorporated into a revised G1WF Licence Conditions Handbook for review and approval by the Commission.
3. The Waste Management Plan specify the quantities, characteristics, and destination of waste arising from decommissioning and demolition activities, and address deficiencies in waste characterization.
4. The Commission explain how the storage of irradiated fuel bundles from the G1WF at WMA of the Chalk River Laboratories became an authorized activity.
5. The Commission direct staff to prepare and make publicly available a list of the Facility Authorizations at the Chalk River Laboratories, and a description of the authorized facilities at this location, to be updated annually and included in the Regulatory Oversight Report for Canadian Nuclear Laboratories Sites, along with a description of revisions to the Facility Authorizations and the process of making these revisions.
6. The Commission explain how the decision to hold only a "Hearing in Writing" for the G1WF licence amendment application was made.

Background

Regarding recommendations 1 and 2, section 7.4 (Waste Management Plan) of REGDOC-2.11.2, *Decommissioning*, states that "The licensee shall prepare a waste management plan." No further consideration should be given to the G1WF licence amendment application until this requirement is met.

Section 15 of the G1WF *Detailed Decommissioning Plan Volume 1: Program Overview*, while called a "Waste management plan," only "provides a summary of the waste types and estimated quantities of the waste that is currently stored at G1WF and the waste that will be generated due to the Phases 3 Decommissioning (i.e., D&D) activities," along with "an overview of the waste management practices that will be applied to both stored and decommissioning wastes."

Section 15, in referring to an April 2020 “*Waste Management Plan for the Gentilly-1 (G-1) Prototype Reactor Site*” (not publicly available), says that waste will be “shipped for either processing, storage, or disposal as appropriate.”

General statements of this nature do not meet the requirements of REGDOC-2.11.2. The REGDOC states that “the waste management plan shall describe the systematic process for how the waste will be moved from the decommissioning and dismantlement areas to the areas for subsequent steps of waste management.”

The Waste Management section of the draft Licence Conditions Handbook in staff CMD 26-H100 lacks compliance verification criteria specific to G1WF decommissioning, and specifically does not mention the April 2020 “*Waste Management Plan for the Gentilly-1 (G-1) Prototype Reactor Site*.” A *G1WF Phase 3 Decommissioning and Demolition Waste Management Plan* should be prepared, reviewed, approved, and incorporated into a revised G1WF Licence Conditions Handbook for review and approval by the Commission.

As stated in section 8.2 (Waste Management) of REGDOC-2.11.2, “Prior to the execution of decommissioning the licensee must ensure the availability of packages for radioactive waste, the disposition path of radioactive waste arising from decommissioning activities, and the ability of those disposition paths to accommodate the types and volumes of material.”

The *G1WF Detailed Decommissioning Plan Volume 1: Program Overview* is unacceptable owing to its absence of detailed descriptions of how demolition waste will be packaged, transported, stored, and disposed. If the licensee plans to ship all the radioactive waste arising from Phase 3 decommissioning to the Chalk River Laboratories for interim storage, the transport packages, the facilities that would house the waste there, and ultimate disposal plans must be described, along with plans to monitor the G1WF waste and maintain detailed records of its contents at its new location. If these requirements cannot be met, then the current “Storage with Surveillance” phase of G1WF must be prolonged.

Section 8.2 of REGDOC-2.11.2 states that the licensee “shall characterize... all waste from decommissioning,” and “shall ensure the traceability and maintain up-to-date records of the waste... transferred to another facility, location or site, specifying its quantities, characteristics and destination.” Our previous submission notes deficiencies in the *Detailed Decommissioning Plan Volume 1: Program Overview* regarding waste characterization. In recommendation 3, we ask that these deficiencies be corrected prior to approval of the *Plan* and issuance of a licence amendment.

Regarding recommendation 4, we refer to a document entitled *Facility Authorization for the Operation of the Waste Management Areas at the Chalk River Laboratories*, WMA-00583-FA-001, dated 2018 November. Section 2 (Scope) of this document stated that “a) This document applies to the operation of the Facility, which comprises the operating facilities listed in Table 2-1 and the non-operating facilities listed in Table 2-2.”

In this document, Table 2-2 shows WMA G, the “Site of Above-Ground Concrete Canisters,” as a non-operating facility. Section 7.2.8.1 in this document stated that “a) No additions of waste shall be made to the inventories of stored irradiate fuel bundles at WMA G.”

The *Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2024* describes the Gentilly-1 Fuel waste Transfer Project. Spent fuel from the Gentilly-1 reactor was transferred to the Chalk River Laboratories by Canadian Nuclear Laboratories during the period December 2024 to July 2025. CNSC staff “authorized... shipments of the spent fuel.” The *Regulatory*

Oversight Report says that as part of the regulatory approvals for this project, “CNL submitted an updated Facility Authorization.”

If WMA G was a non-operating facility prior to 2024, when and how was a non-operating facility modified to accommodate the G1WF irradiated fuel bundles? When were new concrete canisters built at WMA G? Did the CNSC issue a construction licence and authorize this activity? Was there public notification and an opportunity for public comment prior to commencement of construction?

In the interests of transparency and public trust in the regulator, and to inform possible future fuel transfer activities, we recommend that the Commission describe the sequence of authorizations that culminated in the transfer of the Gentilly-1 spent fuel to WMA G at the Chalk River Laboratories. The Commission should make this description publicly available, and include the involvement of CNSC staff, and its interactions with the licensee.

More generally, regarding recommendation 5, we request that the Commission describe how the CNSC reviews and approves Facility Authorizations. We recommend that an updated list of the Facility Authorizations for the Chalk River Laboratories be included in each *Regulatory Oversight Report for Canadian Nuclear Laboratories Sites*. We note that the 2024 *Report* does not describe the authorized facilities at Chalk River Laboratories to which material arising from G1WF decommissioning is being sent. This reduces accountability and transparency, and contributes to a lack of trust in the regulator.

Regarding recommendation 6, our group made written and oral submission for the November 25-26, 2020 public hearing on the application from Canadian Nuclear Laboratories to amend its waste facility decommissioning licence for the Douglas Post Waste Facility. This two-day hearing allowed interveners to interact directly with the Commission. We note that although this hearing considered the detailed decommissioning plan for the Douglas Point reactor site, the 10-year licence issued after the hearing does not encompass reactor dismantling, and there will another opportunity for public input before this activity occurs.

The Commission should explain its deviation from previous practice in holding only a “Hearing in Writing” for the final decommissioning of the G1WF. As the licensee is proposing full dismantling of the Gentilly-1 reactor, a public hearing that provided the Commission to test the evidence provided by the licensee and staff, and to hear from First Nations and the public, is indicated.