



CMD 26-H100.2B

Date: 2026-06-21

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

CCRCA Comments - Hearing in Writing - CMD 26-H100

Concerned Citizens of Renfrew County and Area is providing this additional submission related to the application by Canadian Nuclear Laboratories (CNL) for a licence to begin final Decommissioning and Demolition (D&D) activities at the Gentilly-1 (G-1) reactor site.

Full dismantling of a nuclear power reactor in Canada is precedent-setting. It should be considered in an open, transparent, and scientifically credible manner. Improperly managed Intermediate and low level radioactive wastes pose significant long-term risks to public health.

In Table 16 of its “Gentilly-1 Waste Facility Detailed Decommissioning Plan Volume 1: Program Overview,” CNL estimates that in Planning Envelope A, 97% of the concrete waste; 100% of the structural steel, miscellaneous metals, and rebar; and 100% of the excavated materials, are “potentially clearable.” Planning Envelope A includes the Turbine Building.

The turbine of a boiling water reactor is directly exposed to steam generated within the reactor core. It thereby becomes radioactive—more so than the turbine of a pressurized water reactor. The 1992 “Final Report of the Decontamination and Decommissioning of the BORAX-V Facility Turbine Building” describes the handling of decommissioning waste from the turbine of a boiling water reactor with a similar operating history to Gentilly-1. All concrete and metal components were managed as radioactive waste, as were large quantities of excavated materials. The figure below is from IAEA Technical Reports Series No. 439, “Decommissioning of Underground Structures, Systems and Components.”



FIG. 5. Removal of contaminated soil around the boiling water reactor (BORAX) turbine building at Idaho National Engineering Laboratory, Illinois, USA.

The G-1 reactor had a poor operating history. Leaks of heavy water make it likely that D&D activities will expose radioactively contaminated soil. This creates significant environmental risks to the adjacent St. Lawrence River. These are not adequately addressed in the CNL documents that the CNSC has made publicly available. Furthermore, no approved facilities exist to manage low and intermediate waste arising from D&D activities, increasing these risks.

There appears to be a trade-off between safety and cost savings in the present matter. CNL has a strong economic incentive to clear as much D&D waste as possible, minimizing hauling and storage costs. On the other hand, protection of public health, safety, and the environment requires use of the precautionary principle. Waste should be considered to be “contaminated,” not “potentially clearable,” and maintained in isolation from the biosphere.

We emphasize the point made in our previous submission that “information about the G1WF decommissioning waste is inadequate, including the nuclear substances contained in it and long-term waste management plans.” Metal and concrete components of a reactor facility contain many “difficult-to-measure” radionuclides. Declaring these components to be “clearable,” based on imprecise ratios between difficult-to-measure radionuclides and easily-measured gamma emitters, is unacceptable from a public health perspective.

By denying our request for a full oral hearing, and allowing CNL to withhold key safety documents from the public, the CNSC is not fulfilling its object to prevent unreasonable risk to the environment and to the health and safety of persons.

Decisions on these matters were made by a single Commissioner, Marcel Lacroix.

It appears that Dr. Lacroix may have an inadequate grasp of his responsibilities as a Commissioner. Documents released by the CNSC in response to an Access to Information Program request include two of his CVs. In the more recent one, he claims the licensing of nuclear power reactor operations as a “tangible achievement.” As to the “*Duties of a commissioner*,” the first one he lists is “*To license nuclear activities*.”

Licensing of nuclear activities is not a “duty” for the CNSC, nor for an individual Commissioner. Licence issuance is not a personal achievement. In order to limit the risks of decommissioning the G-1 reactor to a reasonable level, priority must be given to protection of public health and the environment. CNL has not demonstrated that it would limit these risks to a reasonable level. Its application for a licence amendment must be rejected.