



MEMORANDUM

NOTE DE SERVICE

To Candace Salmon
A Commission Registrar, CNSC


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Kimberley Campbell, A/Director General DNC...
Signed by: Campbell, Kimberley A

Subject CNSC Staff's Review of Canadian Nuclear Laboratories Request for Confidentiality on
Objet CMD 26-H100 – Gentilly-1 Waste Facility

PURPOSE

On April 21, 2026, Canadian Nuclear Laboratories (CNL) submitted a Request for Confidentiality of Material Submitted in Relation to Gentilly-1 Waste Facility Licence Amendment Application Hearing in Writing CMD: 26-H100.

CNL has requested the Commission take measures to prohibit the publication and disclosure of the following information under rule 12 of the Canadian Nuclear Safety Commission Rules of Procedure (the Rules):

- The entire content of: Preliminary Hazard Analysis for the Gentilly-1 Waste Facility, 61-01320-HA-001, Revision 0
- The entire content of: Bounding Accident Analysis for the Phase 3 Decommissioning of the Gentilly-1 Waste Facility, 61-01320-ASD-001, Revision 0
- The entire content of: Safety Analysis Report for the Gentilly-1 Waste Facility, 61-03610-SAR-001, Revision 3.1

The purpose of this memorandum is to provide information to the Commission Registry regarding CNL's Request for Confidentiality.

DISCUSSION

CNSC staff reviewed CNL's Request for Confidentiality. This information, along with CNSC staff comments, is included in Table 1.

In CNL's Request for Confidentiality, CNL confirmed that the above listed documents are not available through any public sources. CNSC staff are not aware of the material being available elsewhere.

CNSC staff confirm that the three documents listed above have consistently been treated confidentially in CNSC staff's dealings with CNL.

CNL provided the following summaries for each document:

- Preliminary Hazard Analysis for the Gentilly-1 Waste Facility: The G1WF Preliminary Hazard Assessment provides a systematic assessment of hazards to workers, public, and the environment associated with decommissioning of the G1WF. This report is used as an input into the Bounding Accident Analysis.
- Bounding Accident Analysis for the Phase 3 Decommissioning of the Gentilly-1 Waste Facility: The Bounding Accident Analysis assesses the hazards and initiating events identified in the Preliminary Hazard Analysis and assesses the radiological consequences to workers, on-site receptors, and off-site receptors. The dose consequences to the facility worker for the bounding event was found to be within the dose acceptance criteria. Controls and processes are in place to provide defense in depth.
- Safety Analysis Report for the Gentilly-1 Waste Facility: The Safety Analysis Report (SAR) analyzed events that could lead to release of nuclear substances and the potential for accidental exposure to high radiation fields impacting workers, on-site personnel, the public, and the environment. The SAR demonstrates that the hazards associated with the G1WF do not pose any unacceptable risks to its workers, on-site personnel, the public, and the environment.

It is CNSC staff opinion that the above summaries for the three documents are reasonable.

The CNSC staff submission nor the AECL/CNL submission for the three most recent Commission Proceedings regarding the Gentilly-1 Waste Facility referenced the three documents listed above, further supporting CNSC staff confirmation that the documents have consistently been treated confidentially:

- CMD 18-H107 and CMD 18-H107.1
- CMD 14-H117 and CMD 14-H117.1
- CMD 14-H107 and CMD 14-H107.1

CONCLUSION

CNSC staff have reviewed CNL's Request for Confidentiality and provide the information in this memorandum to the Commission Registry.

Prepared by: Shona Thompson, Senior Project Officer, Wastes and Decommissioning Division, CNSC

Attachment: Table 1

Contact: Shona Thompson, shona.thompson@cnsccsn.gc.ca, 613-809-4059, Canadian Nuclear Safety Commission

Table 1: Material Subject to CNL's Request for Confidentiality

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
1.	Preliminary Hazard Analysis for the Gentilly-1 Waste Facility, 61-01320-HA-001, Revision 0	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input checked="" type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	This report contains names of staff and technical information associated with structures, systems, and components at the G1WF. The complete document is not intended for distribution. Summary: The G1WF Preliminary Hazard Assessment provides a systematic assessment of hazards to workers, public, and the environment associated with decommissioning of the G1WF. This report is used as an input into the Bounding Accident Analysis.	CNSC staff are not aware of the material being available elsewhere. CNSC staff confirm that this document has consistently been treated confidentially in CNSC staff's dealings with CNL. It is CNSC staff opinion that the summary for this document is reasonable.
2.	Bounding Accident Analysis for the Phase 3 Decommissioning of the Gentilly-1 Waste Facility, 61-01320-ASD-001, Revision 0	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial,	This report contains technical information associated with structures, systems, and components at the G1WF.	CNSC staff are not aware of the material being available elsewhere. CNSC staff confirm that this document has consistently been treated confidentially in CNSC staff's dealings with CNL.

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
			<input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	The complete document is not intended for distribution. Summary: The Bounding Accident Analysis assesses the hazards and initiating events identified in the Preliminary Hazard Analysis and assesses the radiological consequences to workers, on-site receptors, and off-site receptors. The dose consequences to the facility worker for the bounding event was found to be within the dose acceptance criteria. Controls and processes are in place to provide defense in depth.	It is CNSC staff opinion that the summary for this document is reasonable.
3.	Safety Analysis Report for the Gentilly-1 Waste Facility, 61-03610-SAR-001, Revision 3.1	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical,	This report contains technical information associated with structures, systems, and components at the G1WF; this includes fissile material which is not shared publicly. The complete document is not intended for distribution.	CNSC staff are not aware of the material being available elsewhere. CNSC staff confirm that this document has consistently been treated confidentially in CNSC staff's dealings with CNL. It is CNSC staff opinion that the summary for this document is reasonable.

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
			<input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>Summary: The Safety Analysis Report (SAR) analyzed events that could lead to release of nuclear substances and the potential for accidental exposure to high radiation fields impacting workers, on-site personnel, the public, and the environment. The SAR demonstrates that the hazards associated with the G1WF do not pose any unacceptable risks to its workers, on-site personnel, the public, and the environment.</p>	