



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

CMD 26-M4.1

Date: 2026-01-27

**Written Submission from the
Alderville First Nation**

**Mémoire de la
Première Nation Alderville**

In the matter of the

À l'égard du

**Regulatory Oversight Report for
Canadian Nuclear Laboratories Sites:
2024**

**Rapport de surveillance réglementaire
des sites des Laboratoires Nucléaires
Canadiens : 2024**

Commission Meeting

Réunion de la Commission

March 2026

Mars 2026

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January 28, 2026
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Alderville First Nation's submission on the Canadian Nuclear Safety Commission ("CNSC") CMD 26-M4 - CNSC Staff Submission-Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2024

Section	Text	Comment
Plain language summary	Each year, CNSC inspectors conduct inspections at the CNL sites. The number of inspections and focus area depend on the nature and complexity of the individual site and its performance. The CNSC uses a risk-informed approach when planning inspections.	Is more information on what determines frequency and depth of inspections at CNL sites available? What makes a site complex in this context? Do greater numbers of non-compliance result in more thorough inspections?
2.1.3.3 Environmental Management System	The CNSC requires that licensees develop and maintain an Environmental Management System (EMS) to provide a documented framework for integrated activities related to environmental protection. An EMS includes activities such as establishing annual environmental objectives, goals, and targets.	Does the CNSC require an EMS to be updated over time or justified in any way? If a licensee has a shortcoming that can be traced back to a flaw with their EMS, does that trigger a revision?

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2.2.11 Waste management	<p>In 2024, CNSC staff conducted 2 inspections at WL, including the Waste Management SCA which resulted in 1 NNC issued to CNL which pertained to characterization reports lacking sufficient detail to provide the necessary information to demonstrate compliance with operational limits for storage of waste packages.</p>	<p>What are the consequences of this non-compliance? What details were missing and how does it affect the handling of waste?</p>
2.3.3.1 Effluent and Emissions Control	<p>The dust plume occurred during an offloading of cement into the cement silo and was caused by a failed gasket that was not secured to the filter housing of the cement silo. The plume of dust travelled east over the Ganaraska River and was visible for approximately 4 minutes before dissipating. All airborne and liquid effluent releases of radiological and hazardous substances remained well below their regulatory limits except 1 occurrence where copper and zinc exceeded the Environmental Compliance Approval ECA limits for the Potable Water Treatment System located at the Port Hope Harbour and Centre Pier.</p>	<p>Why are these instances not considered reportable events? How has the conclusion that the effluent verification monitoring program at PHAI continues to be protective of the environment and the public been determined?</p>

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2.4.3 Environmental protection	CNL provided rationale for not triggering requirements under CSA N288.4, Environmental monitoring programs at Class I nuclear facilities and uranium mines and mills for DPWF; thus, determining that environmental monitoring programs at these facilities were not required. CNSC staff assessed CNL's information and concluded as such.	How is CNL sure that the waste stored at the site has no potential to leak/contaminate the environment?
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