



Oral presentation

**Submission from
Danielle Paul**

In the Matter of the

Canadian Nuclear Laboratories

Application for the renewal of the Nuclear
Research and Test Establishment Operating
Licence for the Chalk River Laboratories

Commission Public Hearing

January 23-25, 2018

Exposé oral

**Mémoire de
Danielle Paul**

À l'égard des

Les Laboratoires Nucléaires Canadiens

Demande de renouvellement du permis
d'exploitation d'établissement de recherche
et d'essais nucléaires pour les Laboratoires
de Chalk River

Audience publique de la Commission

23-25 janvier 2018

Open Letter to the Canadian Nuclear Safety Commission
Sent by email to cns.interventions.ccsn@canada.ca

Re: 2018 relicensing of Chalk River Laboratories (CRL)

As a resident of Renfrew County whose ancestors came up the Ottawa River to settle here in the 1800s and whose livelihoods depended on our watersheds, I feel very strongly about the 2018 relicensing of Chalk River Laboratories (CRL). I would like to make an oral presentation during the public hearings, to be held in Pembroke Ontario on January 24 and 25. I hope to be able to come to Pembroke and make an oral intervention in person, or at least to make a telephone intervention. Would you kindly advise the location of the hearings.

1. The proposed licence terms is for 10 years, much longer than any previous licence terms. This is unacceptably long for a new licensee undertaking new activities on the site. I believe government should exhibit wisdom in taking appropriate care with highly-sensitive and dangerous operations, instead of crass commercialism by going for the cheapest option. I therefore fully endorse the Concerned Citizens intervention which states: *A 10-year licence is unwise as there are very big changes being planned at the Chalk River site. The consortium has been operating at Chalk River for only three years and should be kept on a short lease to ensure that the public and the regulator have ample opportunity to nip problems in the bud as CNL embarks on an entirely novel set of activities. A 2 or 3 year licence at most should be granted.*
2. I do not see how Canada can maintain oversight of this NSDF without clearly defining in precise terms what the oversight will be and what is best practice. I therefore fully endorse the Concerned Citizens intervention that states: *CNSC is the sole agency charged with protecting the health and safety of Canadians and the environment; as such it should not be relaxing licensing requirements but making them more stringent. All existing reporting requirements should be maintained and strictly enforced, and explicit permission should be required for each and every new facility on site, with regulatory approval and public notification required at every stage of development.*
3. I am very concerned at the prospect of mixing toxic waste materials on the site at Chalk River. We need detailed criteria for and oversight of the importing (or potential importing) of waste from other sites, including all aspects of transport and storage. I therefore fully endorse the Concerned Citizens intervention that states: *To enable future generations to deal with radioactive and toxic materials at the Chalk River site, as well as those being brought it from*

elsewhere, new licence requirements should be added to require that all waste materials be properly segregated, labelled, and packaged with a complete inventory of the contents of each package. Mixing diverse toxic materials together will make it extremely difficult for future generations to properly characterize the waste; and, in the case of failure of containment, to take appropriate corrective action.

4. The record of the newly-formed consortium is of great concern. Thus I fully endorse the Concerned Citizens intervention which states: *The crown corporation AECL, as the owner of the site and the waste, and as the agency that has contracted CNL to operate the site and manage the waste, has had some serious ongoing problems with its management structure; the regulator and the public need to be able to monitor AECL's ability to maintain control over the consortium. A shorter licence period is in order to allow for timely review of such.*

5. I believe that there should be greater transparency and accountability to the general public regarding the environmental impact of long term storage of this waste near a major watershed. Without more details available to the general public or a trusted government body that provides sufficient transparency, I do not trust that the concerns by members of the public are being addressed. I therefore fully endorse the Concerned Citizens intervention which states: *The licence should reflect growing public concern over the long-term management of radioactive and other toxic waste products, including a set of requirements designed to keep dangerous waste materials as far away as possible from the Ottawa River, and to ensure that such wastes are packaged and routinely monitored so that leaks are readily detected and repairs can be expeditiously made for centuries to come.*

Yours sincerely

[Signed]

Danielle Paul