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## **Oral presentation**

### **Submission from Prevent Cancer Now**

In the Matter of the

#### **Canadian Nuclear Laboratories**

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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 Prevent Cancer Now**

À l'égard des

#### **Les Laboratoires Nucléaires Canadiens**

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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**



December 11, 2017

[www.PreventCancerNow.ca](http://www.PreventCancerNow.ca)

Canadian Nuclear Safety Commission (CNSC)  
[cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)

Re: Re-licencing of Chalk River Laboratories

*Prevent Cancer Now* (PCN) is a national civil society organization that works for primary cancer prevention, and has an ongoing interest in nuclear facilities and waste.

We are writing to request the opportunity to appear before the January 2018 panel, with regard to the re-licencing of Chalk River Laboratories (CRL). In short, PCN requests that CRL continues to operate on short term licences - two to three years, with renewal subject to performance and planning. This would be most prudent, as plans for future activities (e.g., small modular reactors) are in flux and no waste disposal site is currently approved. Indeed, we believe that a permanent nuclear waste storage facility at this site is ill-conceived, and those living downstream have not been adequately consulted.

PCNs fundamental concerns include that:

- Radionuclides are extremely long lived, with both chemical and radioactive toxicities. They are known carcinogens;
- Atomic Energy of Canada has been scaled down to the point that rigour of oversight may be compromised, particularly during this period of CNL uncertainty, with diverse plans and new projects being mooted; and
- In addition to waste concerns, “small modular reactors” represent technologies with fundamental technological constraints and design-specific risks.

We harbour concerns that the Chalk River site will eventually be an abandoned large facility for nuclear waste disposal, and entombed reactors. Interim activities may nevertheless create significant quantities of additional medium- and high-level wastes.

With regard to establishing a nuclear waste disposal facility at Chalk River, and expanding research and nuclear activities, we point to well known facts that argue against expansion:

- “Chalk River” gained its name from its geology - chalk (limestone) is extremely permeable;
- The Ottawa River, as well as wetlands and other watercourses will continue to be impacted;
- The Ottawa Valley is seismically active, so the lining of a waste site will inevitably be compromised, with water bearing radionuclides to local and downstream drinking water; and
- No monitoring and reactive leak detection will preclude leakage – it will merely monitor and perhaps, if the site is still maintained, eventually limit harm.

As the new commercial owners of CRL seek lucrative opportunities, we look to the Canadian Nuclear Safety Commission to grant a short term licence, and thereby maintain rigorous oversight and control. This is essential to ensure that the activities at the Chalk River site will truly be in the best long term interest of local residents, all Canadians and the environment, rather than lock increasing risks in stone (actually, permeable chalk) for generations to come.

Sincerely,



Meg Sears PhD  
Chair, Prevent Cancer Now  
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