



File / dossier : 6.01.07

Date: 2017-12-11

Edocs: 5414714

Oral presentation

Submission from the Ottawa River Institute

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 Ottawa River Institute

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



The Ottawa River Institute

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"Fostering sustainable communities and ecological integrity in the Ottawa River watershed"

Ms. Louise Levert
Senior Tribunal Officer, Secretariat Division
Canadian Nuclear Safety Commission

Dear Ms. Levert

The Ottawa River Institute is an incorporated not-for-profit charitable organization based in Renfrew County, Ontario. Our mission is to foster ecological integrity and sustainable communities in the Ottawa River watershed.

We have a number of concerns about the relicensing of the Chalk River Laboratories site that we would like to bring to your attention.

First and foremost among our concerns is the large quantity of radioactive waste on site at the Chalk River property as described in the Ottawa Citizen article from December 19 2011 "A Toxic Legacy". These wastes include waste reactor cores including one from the partial meltdown in 1952, wastes from several decades of plutonium extraction for nuclear weapons, spent fuel rods, and highly radioactive liquid wastes. According to Public Works Canada, the estimated cost of cleaning up these wastes is higher than the cost of cleaning up more than 2,000 other federal environmental liabilities put together. Under the Nuclear Legacy Liabilities Program, progress was made on clean up at Chalk River, but the program was cancelled in 2015. The subsequent lack of progress on Canada's most complicated, expensive and difficult environmental remediation challenge is very concerning. We therefore recommend that the Commission ask the Minister of Environment and Climate Change to initiate and lead a public panel review under the provisions of the Canadian Environmental Assessment Act to address the environmental liabilities at the Chalk River Laboratories.

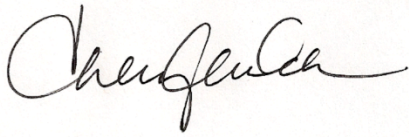
Along with many others, we are concerned that the Commission appears to be reducing its oversight of the Chalk River Laboratories at a time when increased oversight would appear to be needed. We would like to recommend an extension of the current license for a period of no longer than 18 months with all current license conditions intact. Any future license changes should increase stringency and reporting requirements. Specific license conditions should be added that would require the construction of state of the art storage facilities, well away from the Ottawa River in shallow caverns in stable rock formations. These license conditions should ensure that long-lived radioactive materials are packaged, labeled and kept out of the biosphere in retrievable conditions.

Finally we are very concerned about the licensee's plans to test as many as seven new small modular reactor designs at the Chalk River Laboratories site. Small modular reactors are not compatible with

sustainable development or sustainable communities. Mining and refining of the reactor fuel requires the burning of significant quantities of fossil fuels, as do the decommissioning and waste management stages of nuclear electricity generation. Worse still, small modular reactors, like their larger predecessors, would create toxic radioactive waste that would need to be managed for more than 100,000 years thus creating an undue burden on future generations. We therefore suggest the Chalk River site license should strictly preclude the development of small modular reactors at the Chalk River site.

We appreciate the opportunity to participate in the public hearing for the relicensing of the Chalk River Laboratories. We would like to make an oral presentation at the hearing.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Keetch", written in a cursive style.

Cheryl Keetch, Coordinator