



## **Oral presentation**

**Submission from  
Lynn Jones**

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  
Lynn Jones**

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**



**From:** [Lynn Jones](#)  
**To:** [Interventions \(CNSC/CCSN\)](#)  
**Subject:** Consideration of the Site License Renewal for the Chalk River Laboratories - request to intervene from Lynn Jones  
**Date:** December 12, 2017 00:46:40

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Dear Ms Levert

I would like to make an oral intervention in the public hearing to consider renewal of the site license for the Chalk River Laboratories. I am a resident of the Ottawa Valley and a property owner, downstream of the Chalk River Laboratories site.

I am very concerned about the accumulation of radioactive wastes at the Chalk River Labs site, many of which will be hazardous and radioactive for many thousands of years, even more than 100,000 years according to experts. The quantity of “low” and “intermediate” level radioactive wastes now at Chalk River according to the most recent inventory is approximately 500,000 cubic metres. According to CNL’s “Integrated Waste Strategy”, a heavily redacted version of which was obtained through Access to Information, all of Canada’s federally-owned radioactive wastes, including irradiated fuel, from federally-owned sites in Quebec, Western Ontario and Manitoba will be consolidated at the Chalk River Labs site. This represents a lot more waste that the licensee wants to bring to Chalk River.

Unfortunately, it seems that there is at present no plan to responsibly manage these wastes and keep them out of the biosphere for the thousands of years and more that they will constitute a hazard to all living things.

The Nuclear Legacy Liabilities Program was cancelled in 2015. A Comprehensive Preliminary Decommissioning Plan (CPDP), prepared in 2014 as a license requirement for the Chalk River Labs site, still exists, but the licensee’s plan for an engineered above-ground mound, is not part of that CPDP. Would the Commissioners please help to clear up the confusion around this by asking the licensee, what the status of the CPDP is, and if it is still the plan for the Chalk River Labs site, then why is the engineered mound for “low” level waste not included in it?

In the absence of a detailed plan and state of the art facilities for responsibly managing the radioactive wastes currently on site, the licensee should be prohibited from initiating new waste streams, such as by creating an experimental testing ground for small modular reactors. The licensee should also be prohibited from consolidating all federally-owned wastes at Chalk River, unless and until there are suitable facilities to receive the wastes.

Because a plan is urgently needed and because there is there is confusion about clean-up priorities, I would like to request that the Commission take steps to initiate a full public panel review under the Canadian Environmental Assessment Act, to address cleanup of the radioactive legacy wastes at Chalk River.

I would also like to request that the Commission refuse to grant the licensee's request for a 10-year license. The 10-year term makes no sense given that the consortium's contract would end in the middle of the license period. I would also suggest that given the consortium's plan to create a giant above-ground mound of "low" level and long-lived wastes -- which defies International Atomic Energy Agency guidance about isolating such wastes from the biosphere -- that there is serious doubt as to the licensee's willingness and ability "to make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed." According to the NSCA you should not renew a license in this case.

Thank you for considering my request to intervene and make an oral presentation at this hearing.

Yours sincerely,

Lynn Jones