



Canadian Nuclear  
Safety Commission

Commission canadienne  
de sûreté nucléaire

CMD 18-H2.71

File/dossier: 6.01.07

Date: 2017-12-10

Edocs: 5414236

**Written submission from  
Kathleen Eisner**

**Mémoire de  
Kathleen Eisner**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories**

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**Les Laboratoires Nucléaires Canadiens**

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

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

**Commission Public Hearing**

**Audience publique de la Commission**

**January 23-25, 2018**

**23-25 janvier 2018**



Written submission to the January 2018 Canadian Nuclear Safety Commission hearing on the application from Canadian Nuclear Laboratories (CNL) for the renewal of its nuclear research and test establishment operating licence for the Chalk River Laboratories (CRL).

Thank you for considering my intervention in this matter. As a resident of Renfrew County, I have followed developments at the Chalk River facility with interest for over 40 years. I want to register my opposition to approval of this application for a ten year renewal of licence. I also want to register my opposition to any changes in the licence as regards the responsibilities of CNL in terms of public health and safety and waste management.

I believe that a ten-year renewal of licence is far too long. Granting such an application would be an abdication of responsibility on the part of the organization that is meant to protect the public – the CNSC. Given the recent change of management at the CRL to the profit-making multi-national consortium, CNL, I believe that it is more important than ever that CNSC be in a position to closely scrutinize the facility in order to protect the public and in order to assure the public that we have reason to feel safe.

CNL must be publicly accountable. The CNSC is our representative. The only opportunity for the public to express concerns is at its public hearings – 2028 is too far away for the next opportunity. The licenses have been for shorter terms in the past. There is no reason to grant a new management group such a long term license. If a license is granted, it should be for no more than two years, a reasonable length given all the recent changes in management at Chalk River.

The license requirements should also be at least as comprehensive as in the past. The responsibilities of CNL to the public are paramount. They must be held accountable and there should be no removing of approval, reporting and record-keeping requirements from the site license for Chalk River Laboratories. In particular, I am concerned that it appears that the new agreement would remove the current license requirement that the licensee - Canadian Nuclear Laboratories – “shall ensure that nuclear legacy liabilities at the CRL site are addressed.” To my mind, clean-up of the historic toxic materials as well as any that may be created should be the top priority.

We, in Renfrew County have had a nuclear facility at Chalk River for longer than anyone can remember. It has provided many quality jobs, and some overly dangerous ones. There has been, at times, an uneasy relationship with our neighbours, AECL and CRL. There is no relationship yet with CNL. We need to be assured that the Canadian Nuclear Safety Commission is doing its job to keep us safe. That means oversight needs to be regular and thorough. Granting a ten-year license renewal with fewer conditions will not assure us that there is public scrutiny and an adherence to public safety precautions.

I urge the Commission to maintain or increase the conditions of past licenses and if a renewal is granted, make it a short-term one.

Sincerely,

Kathy Eisner