



Canadian Nuclear  
Safety Commission

Commission canadienne  
de sûreté nucléaire

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**Written submission from  
Emma Manchester**

**Mémoire de  
Emma Manchester**

In the Matter of the

À l'égard des

**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

**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

**Commission Public Hearing**

**Audience publique de la Commission**

**January 23-25, 2018**

**23-25 janvier 2018**



Written Intervention only (not Oral)

In the Jan 24-25, 2018 Hearing on the Canadian Nuclear Laboratories Application to Renew Nuclear Research and Test Operating License for Chalk River Laboratories

By Emma Manchester, Killaloe, ON

I am opposed to the Canadian Nuclear Laboratories' application for a ten-year license for their operation of the Chalk River Site.

I am concerned about removal of 28 of the 56 former license conditions in the new license that your staff are recommending for the Chalk River Laboratories.

Legal experts consulted by the Concerned Citizens of The Renfrew County and Area, have stated that CNSC's proposed changes to the Chalk River site license **would greatly reduce CNSC oversight and render important safety requirements unenforceable.**

It is concerning that these changes to the license have not been transparently communicated to the general public. Why does the CNSC's hearing document neglect to say that the regulator is proposing to remove license conditions, and the "proposed license changes" section of CNSC's hearing document only says that the new license uses a "standard format"?

Rather than relaxing licensing requirements, I strongly urge the CNSC, as the sole agency charged with protecting the health and safety of Canadians and the environment, to make the license conditions more stringent, with regulatory approval and public notification required at every stage of development.

We need additional license requirements that:

- a) Require that all waste materials be properly segregated, labelled, and packaged with a complete inventory of the contents of each package to enable future generations to safely deal with radioactive and toxic waste and,
- b) Include a set of requirements designed to keep dangerous waste materials as far away as possible from the Ottawa River (or other bodies of water)

We need a license with conditions that reflect the growing public concern over the long-term management of radioactive and other toxic waste products.

Sincerely,  
Emma Manchester