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## **Oral presentation**

### **Submission from the Iroquois Caucus**

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 du Caucus Iroquois**

À l'égard des

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

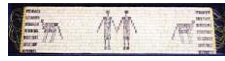
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Demande de renouvellement du permis  
d'exploitation d'établissement de recherche  
et d'essais nucléaires pour les Laboratoires  
de Chalk River

#### **Audience publique de la Commission**

**23-25 janvier 2018**





# IROQUOIS CAUCUS

December 11, 2017

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The Anishinabek Nation and Iroquois Caucus have jurisdiction over the Great Lake and St. Lawrence River Basins as a result of Aboriginal titles, and the treaties that have been entered into by First Nations and the Crown.

Earlier this year, the Anishinabek Nation and Iroquois Caucus have unified and have strongly opposed the transportation of highly radioactive liquid material from Chalk River to South Carolina as well as the abandonment of radioactive waste from Chalk River and other federally-owned nuclear facilities in a giant mound situated beside the Ottawa River, a source of drinking water for millions and a major tributary to the St. Lawrence River.

Many projects have been and are being proposed, decided upon, and initiated in our territories without consulting our First Nation communities. This lack of consultation is unacceptable. Canadian Nuclear Laboratories (CNL) is now seeking a licence from the Canadian Nuclear Safety Commission (CNSC) to operate the Chalk River Nuclear Laboratories for the next ten years.

The Iroquois Caucus strongly opposes the granting of a new ten-year licence for CNL to operate the Chalk River facility. Such a licence would allow CNL to embark upon its ambitious plan to revitalize the Chalk River site and to play a key role in the commercial development of a whole new generation of small modular reactors that would be marketed widely throughout North America and the world, as described on the CNL web site.

The primary responsibility of the CNSC is to protect the health and safety of Canadians and the environment, rather than to facilitate the commercial objectives of private multinational corporations such as those applying for this licence (SNC-Lavalin, Fluor, Rolls-Royce, CH2M, and Atkins). The Iroquois Caucus believes that CNSC, in keeping with its mandate, should insist on “safety first” (including environmental protection).

Accordingly, the Iroquois Caucus believes that review and approval of a thorough and detailed plan for complete site remediation, in consultation with first nations and other affected communities, should be an absolute prerequisite before any consideration is given to the granting of a licence that would allow for a whole new generation of commercially-oriented facilities to be built at Chalk River.

An extension of the existing licence for a period of one or two years should be implemented, with an explicit proviso that the development, public scrutiny and approval of a detailed plan for the clean-up of all legacy radioactive wastes at Chalk River (including intermediate level wastes) and the remediation of all associated waste management areas, be the principal focus of CNL's efforts during that time. Meaningful consultations with First Nations and other affected communities during the plan's development are essential.

The legacy radioactive wastes at Chalk River have the potential to jeopardize the health of future generations for many thousands of years to come as they gradually leak out into the environment, contaminating the source of drinking water and accumulating in the food chain for eons. The Iroquois Caucus believes that monitoring the underground plumes of radioactive contaminants that are slowly making their way towards the Ottawa River is important, but even more important is removing the sources of those plumes – the deposits of radioactive and chemically toxic materials that have been leaking for decades. The Iroquois Caucus believes that properly monitored long-term management of these toxic wastes in robust containment structures far from the Ottawa River is required.

On a related matter, the Iroquois Caucus objects to the on-going shipments of highly radioactive liquid waste from the Fissile Solutions Storage Tank (FISST) at Chalk River to the Savannah River Site (SRS) in South Carolina. Although the exact routes are kept secret, these shipments will inevitably pass through or near our traditional territories, yet there has been no consultation with the Iroquois Caucus at any time by the Canadian Nuclear Safety Commission (CNSC), which is a federal crown agency and has a duty to consult First Nations on such projects.

This matter is directly related to the current licence proposal, as it involves the decommissioning of the FISST tank. It is also relevant to the perception of CNSC by the Iroquois Caucus as a crown agency that is willing and able to protect the health and safety of Canadians, and to provide reliable information on such matters.

The Iroquois Caucus finds it disturbing that the CNSC has been indirectly responsible for the dissemination of misleading information to first responders and emergency planners throughout the province of Ontario. CNSC calls this liquid material "Highly Enriched Uranyl Nitrate Liquid (HEUNL)", thereby suggesting that the only radioactive element contained in the Chalk River liquid is uranium. The Province of Ontario in turn has advised Ontario's first responders that the Chalk River liquid shipments consist of uranyl nitrate.

The Iroquois Caucus has learned that each litre of the Chalk River liquid contains dozens of highly radiotoxic materials other than uranium, including 70 billion becquerels of cesium-137 (per litre) in acid solution. We have been informed that there is enough cesium-137 in just one litre of this highly radioactive liquid to ruin an entire city's water supply.

There are over 250 litres of liquid in each of the 100 to 150 planned truckloads, traversing public roads and bridges that impinge upon First Nations lands and drinking water supplies. CNSC data show that the radioactivity of this liquid is more than 15,000 times greater than the radioactivity of the uranium content alone.

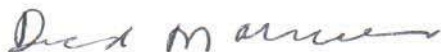
The Iroquois Caucus asks how the CNSC can justify using a misleading characterization of this Chalk River liquid as consisting of one single uranium compound. Such incorrect information from Canada's nuclear regulator does not inspire confidence in our First Nations. It even casts doubt on CNSC's perceived role – is CNSC more interested in protecting the image of the nuclear industry than in giving objective scientific information about the nature of a liquid material that can, in the event of a major spill, seriously jeopardize the health and safety of first responders and of other Canadians, including First Nations?

The Iroquois Caucus urges the CNSC to halt the Chalk River liquid shipments until the entire program is reconsidered in public hearings following consultation with First Nations, given the extraordinary toxicity of this material, the misleading information that has been communicated to first responders, and the unexplored option of downblending and solidifying the liquid material on-site at Chalk River.

The Iroquois Caucus also urges the CNSC not to grant a new ten-year licence to CNL for the Chalk River site, but to grant a one- or two-year extension of the existing licence with an additional explicit requirement that a thorough and detailed plan for complete site remediation be prepared by CNL in consultation with First Nations and other affected communities. No new licence for Chalk River should be considered until such a site remediation plan has been publicly reviewed and officially approved.

The Iroquois Caucus consists of Elected Councils from Akwesasne, Kahnawà:ke, Kanesatake, Mohawks of the Bay of Quinte (Tyendinaga), Oneida Nation of the Thames, Six Nations of the Grand River and the Wahta Mohawks.

On behalf of Iroquois Caucus,



R. Donald Maracle, Chief  
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