

## ROYAL MILITARY COLLEGE OF CANADA • COLLEGE MILITAIRE ROYAL DU CANADA

PO Box 17000, Station Forces • CP 17000, Succursale Forces • Kingston, Ontario • K7K 7B4

25 January 2023

VIA EMAIL

Mr. Denis Saumure Commission Registrar Canadian Nuclear Safety Commission P.O. Box 1046, Station B 280 Slater Street Ottawa, ON K1P 5S9

Dear Mr. Saumure,

## Amendment to the 23 February 2022 RMC SLOWPOKE-2 Application for Operating Licence Renewal: Request Change of Length of Licensing Period

The SLOWPOKE-2 Facility at RMC has an excellent safety and performance record for over 38.5 years. This letter is to amend our licence renewal application [1] from a 10-year to a 20-year licensing period valid from 2023 to 2043.

The SLOWPOKE-2 Facility at RMC is a mature facility with well-tested operational procedures. The Facility maintains training programs, manages obsolescence, practices ALARA, protects the health and safety of workers, the public, indigenous peoples, and the environment, and maintains transparency through an online public information program. The Facility has always been given a "satisfactory" performance rating for compliance to its licence conditions and to the fourteen Safety and Control Areas.

By inspecting the inside and outside of the reactor container, the stainless-steel liner, and the exterior of the neutron beam tube through underwater cameras in September of 2021, as part of the refuelling project, it was concluded that the infrastructure and safety related components looked almost new with no obvious degradation. These pristine conditions are expected to last for another 20 years because the controlling, monitoring and operating of the reactor, which are verified by the CNSC will remain unchanged.

RMC has always kept up with the evolving regulatory environment including implementation of regulatory documents and standards, and will continue to do so on a 20-year licence term. We believe that a longer term will provide an increased level of regulatory certainty and allow RMC to plan on a longer term.



In the next 20 years the Facility will continue with activities, as per the past 38.5 years, to provide an intense neutron source used for the education of the military and civilian students registered in the undergraduate and graduate programmes of the university, for education and training Canadian Armed Forces personnel, and for research to support DND, various other Federal Government Departments including Health Canada, Crown Corporations, research activities at other universities and Canadian industry. It also serves as a tool for the education of interested individuals and the general public about matters dealing with nuclear reactors and radioactivity. The SLOWPOKE-2 facility at RMC continues to attract talented individuals who are interested in making a career in the nuclear industry. RMC continues to maintain highly qualified and skilled personnel.

Taking into account the operating years of all of the seven SLOWPOKEs that were installed in Canada, which in total numbers to approximately 180 years, not one serious accident occurred in all that time. The SLOWPOKE-2 reactor was designed with aspects of inherent safety that have worked well for 180 years and will continue to work well for the next 20 years of operation at the RMC SLOWPOKE-2 Facility. The Facility has an excellent record on compliance inspections and in responding to actions and recommendations made by the CNSC staff. It is also the interest of the Facility to continue to be transparent and helpful to regulating bodies, including IAEA, during its licensing period.

The Facility wishes to continue fulfilling its objectives of teaching the students at RMC, Canadian Armed Forces and the general public about reactors, nuclear science and radioactivity. RMC requests a twenty-year operating licence for the period 01 July 2023 to 30 June 2043, for the SLOWPOKE-2 reactor. This Facility and its reactor are accessible, welcoming and low risk.

If you have any questions with respect to the above, please do not hesitate to contact me or the SLOWPOKE Manager, Dr. Paul Chan.

Sincerely,

Commodore M.T.J. (Josée) Kurtz, OMM, MSC, CD Commandant - Royal Military College/ Collège militaire Royal Canadian Armed Forces/ Forces armées canadiennes josee.kurtz@forces.gc.ca / Office: 613-541-6000 ext 6206

c.c. Dr. P. Bates, Principal

Dr. P. Jolicoeur, Associate VP Research

Dr. P. Chan, Manager, SLOWPOKE-2 Facility

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Ms. K. Nielsen, Director-retired, SLOWPOKE-2 Facility

Mr. A. McAllister, Director NPFD, CNSC

Mr. P. Tanguay, Senior Project Officer, CNSC

## Reference:

1. Letter, Commodore Kurtz to Mr. Saumure, "SLOWPOKE-2 Facility at the Royal Military College of Canada Renewal of Licence NPROC-20.00/2023 for a 10-Year Term", 23 February 2022.