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## **Oral Presentation**

## **Exposé oral**

### **Written submission from the Canadian Nuclear Association**

### **Mémoire de l'Association nucléaire canadienne**

In the Matter of the

À l'égard de

#### **Canadian Nuclear Laboratories, Douglas Point Waste Facility**

#### **Les Laboratoires Nucléaires Canadiens, installation de gestion des déchets de Douglas Point**

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Application to amend the waste facility  
decommissioning licence for the Douglas  
Point Waste Facility

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Demande de modification du permis de  
déclassement de l'installation de gestion des  
déchets de Douglas Point

## **Commission Public Hearing**

## **Audience publique de la Commission**

**November 25-26, 2020**

**25 et 26 novembre 2020**

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October 20, 2020

Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
280 Slater St. PO Box 1046  
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Intervention Regarding Canadian Nuclear Laboratories  
Application for a Licence Amendment to Proceed with Phase 3 Decommissioning at Douglas  
Point Waste Facility.

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life cycle of the nuclear industry and as such are supportive of Canadian Nuclear Laboratories (CNL) application for a Licence Amendment to proceed with Phase 3 decommissioning at Douglas Point Waste Facility.

Nuclear energy is a safe, clean, and reliable source of energy that not only helps Canada meet its electricity needs and it is also a critical element in achieving Canada's greenhouse gas emissions targets. But like all forms of energy, there is waste associated with its generation. The Canadian nuclear industry is a cradle to grave industry and the proper decommissioning and disposal of nuclear facilities, and their waste is a top priority for our industry.

In the case of the Douglas Point Nuclear Generating Station (DPNGS), a multi-phased approach was adopted. The DPNGS was shut down in 1984. By 1986, the fuel had been removed and reactor coolant drained. By the end of 1987, the fuel had been transferred to dry storage. Since then the facility has been in a safe shutdown state known as the "storage with surveillance" phase of decommissioning.

The application before the Commission is to amend the licence to proceed with final decommissioning (phase 3) which involves decommissioning, dismantling, disposal and site restoration. This amendment is to allow further decommissioning activities to begin but the CNA would highlight that within phase 3 there are numerous regulatory decisions that will require public and Indigenous engagement. CNL is committed to reaching out to stakeholders and ensuring that public and indigenous communities will be involved throughout the process.



CNL is required to submit a Detailed Decommissioning Plan (DDP) prior to commencing decommissioning and demolition activities. CNL plans to submit six volumes of DDP to the CNSC, the first of which was submitted as part of this application. Each volume must be approved by the CNSC before activities under that volume can take place.

Like all projects carried out by the nuclear industry, the primary consideration is the protection of people and the environment. CNL has extensive experience in managing nuclear waste and has proven itself qualified to carry out this work.

The CNA believes that CNL's proven track record of managing nuclear waste, the vigorous oversight provided by the CNSC and CNL's commitment to ongoing public and Indigenous relationship-building should provide confidence that this project can and should move forward. For these reasons, the CNA would encourage the CNSC to approve CNL's request for a licence amendment.

Please feel free to contact me directly should you have questions or require additional information.

Sincerely,



Steve Coupland  
Director of Regulatory and Environmental Affairs  
Canadian Nuclear Association