



Oral Presentation

Written submission from the Organization of Canadian Nuclear Industries

In the Matter of the

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

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

Commission Public Hearing

November 25-26, 2020

Exposé oral

Mémoire de l'Organization of Canadian Nuclear Industries

À l'égard de

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

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

Audience publique de la Commission

25 et 26 novembre 2020

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October 21, 2020

Senior Tribunal Officer, Secretariat
Email: cns.interventions.ccsn@canada.ca

Re Hearing Notice NO: 2020-H-04

Canadian Nuclear Laboratories (CNL)
Amendment to Decommissioning Licence for the Douglas Point Waste Facility (DPWF)
Authorization of Phase 3 DPWF Decommissioning Project

Dear Senior Tribunal Officer

On behalf of the Organization of Canadian Nuclear Industries (OCNI) I would like to support the Canadian Nuclear Laboratories (CNL) application for a licence amendment to authorize Phase 3 of the DPWF decommissioning project, including the active decommissioning and demolition of remaining facilities.

OCNI is an industry trade association of more than 230 leading Canadian suppliers to the nuclear industry in Canada and offshore. OCNI companies employ more than 15,000 highly skilled and specialized people who manufacture major equipment and components and provide engineering services and support for the 22 CANDU nuclear power plants that have been constructed in Canada.

OCNI believes that decommissioning the Douglas Point Waste Facility will help minimize and consolidate Canada's nuclear waste liabilities and thereby reduce risk to the public. OCNI is confident that CNL's primary consideration throughout all phases of the project, from the planning stages to execution to completion, will be the protection of the public and the environment. OCNI asserts that CNL has demonstrated excellent performance on related decommissioning and waste management projects, with a focus on both worker and public safety and environmental protection.

OCNI is also confident that CNL continue to carefully follow regulatory processes through which public and Indigenous community inputs will be solicited in helping to shape the decommissioning project.

OCNI endorses CNL's plan to carefully "characterize" or "categorize" each type of waste from decommissioning activities for the Douglas Point Waste Facility so that each type of waste can be managed in an optimal manner of that waste type.

OCNI supports CNL's plan to package radioactive waste from the decommissioning of the Douglas Point Waste Facility in licensed containers and to safely transport the loaded containers to the Chalk River Laboratories site. OCNI is aware that radioactive materials have been transported safely nationally and internationally for over 45 years by road, rail, water and air without a single radiological incident. OCNI believes that this plan to consolidate of all CNL's radioactive waste including that at the DPWF, in one facility, at the Chalk River Laboratories site will minimize risk to the public and the environment.

OCNI also supports CNL's plan to recycle more than 90% of the "clean" waste including scrap metal at off site to recycling facilities. OCNI also commends CNL's plan to segregate designated substances (i.e. asbestos, polychlorinated biphenyls (PCBs), lead, asphalt roofing material, hydrocarbons and other hazardous waste found on industrial sites) and send these designated substances to special off-site facilities that are licensed to receive and handle this type of industrial waste

The CNL parent organizations have considerable international experience in decommissioning and waste management that can be ensure successful decommissioning of the DPWF and demolition of remaining facilities and management of all radioactive and other designated wastes. In addition, a number of OCNI member companies with experience and capabilities in designing and building robotic tooling for working in hazardous environments will be able to support CNL in the safe and efficient execution of this project.

OCNI therefore strongly support CNL's application to amendment its waste facility decommissioning licence for the Douglas Point Waste Facility (DPWF) to authorize Phase 3 DPWF Decommissioning including the active decommissioning and demolition of remaining facilities.

I would like also to make an oral presentation at CNSC Public Hearing on November 25 and 26, 2020.

Yours sincerely



Dr. Ron Oberth
President and CEO