



**Written submission from the
Canadian Nuclear Laboratories**

**Mémoire des
Laboratoires Nucléaires Canadiens**

In the Matter of

À l'égard de

Application from Canadian Nuclear
Laboratories (CNL) requesting a one-year
licence renewal for the Port Granby Project

Demande de renouvellement de permis pour une
période d'un an présentée par les Laboratoires
Nucléaires Canadiens (LNC) pour leur projet de
Port Granby

Public Hearing - Hearing in writing based on
written submissions

Audience publique - Audience fondée sur des
mémoires

November 2021

Novembre 2021



2021 April 08

Mr. Marc Leblanc
Commission Secretary
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, Ontario, K1P 5S9

Dear Mr. Leblanc,

APPLICATION FOR RENEWAL OF THE PORT GRANBY PROJECT WASTE NUCLEAR SUBSTANCE LICENCE WNSL-W1-2311.02/2021

The purpose of this letter is to apply for a licence renewal for a period of one year from the current expiry date of the Canadian Nuclear Laboratories (CNL) *Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021* [1]. This application is submitted in accordance with Section 24(2) of the *Nuclear Safety and Control Act*.

Pursuant to the Nuclear Safety and Control Act and associated regulations, CNL is requesting that the Commission, or a person authorized by the Commission, renew the current Port Granby WNSL [1] for one year to support an alignment with the *Port Hope Long-Term Low-Level Radioactive Waste Management WNSL-W1-2310.02/2022* [2], expiry date of 2022 December 31, and subsequent intended application to consolidate the Port Granby Project WNSL [1] and the Port Hope Project WNSL [2] into one WNSL for both projects. Consolidation of the two project licences would reduce the administrative burden that is created with different licences for similar projects under the PHAI portfolio. Further to this, CNL acknowledges that the application for consolidation of project licences would support a combined full public hearing in 2022 for both the Port Granby and Port Hope licence amendments and the Port Granby Project's transition to Phase III.

CNL is proposing no changes to the terms and conditions of the existing licence [1] or to the associated *Port Granby Long-Term Low-Level Radioactive Waste Management Project Licence Conditions Handbook* [3], with the exception of the proposed licence expiry date. CNL continues its commitment, at all times, for the provision of safe operational practices at Port Granby. CNSC Staff was kept apprised in a timely manner the significant environmental remediation and risk reduction that has been safely performed at the Port Granby Site through *CNL's quarterly reporting and the Annual Compliance Monitoring Report 2020 December CNL Regulatory Oversight Report*.

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Attachment A provides a clause-by-clause statement for relevant excerpts from the *Nuclear Safety and Control Act* and relevant CNSC Regulations, and describes how CNL continues to meet these requirements as per the compliance verification criteria prescribed by the CNSC in the Licence Conditions Handbook [2].

Canadian Nuclear Laboratories looks forward to hearing from the Commission with respect to this application. In the interim, should you require any further information, please contact Sarah Brewer at 613-633-8271, or myself at 613-584-8811, extension 42408.

Sincerely,

Mark Hughey
General Manager
Historic Waste Program Management Office

Attachment (1)

References

- [1] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Granby Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2311.02/2021, Expiry Date: 2021 December 31.
- [2] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Hope Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2310.02/2022, Expiry Date: 2022 December 31.
- [3] Canadian Nuclear Safety Commission, *Port Granby Long-Term Low-Level Radioactive Waste Management Project - Licence Conditions Handbook*, WNSL-W1-LCH-2311, Revision 2, 2019 April.

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Attachment A
Concordance Table for Licence Amendment Application

Section	Requirement	CNL Response
Nuclear Safety and Control Act		
24(2)	The Commission may issue, renew, suspend in whole or in part, amend, revoke, or replace a licence on receipt of an application (a) in the prescribed form;	This attachment with the cover letter provides the information required by the NSCA (the Act) and the Regulations made pursuant to the Act and constitute, in part, an application by CNL to amend its <i>Port Granby Long-Term Low-Level Radioactive Waste Management Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021</i> (PGP Licence) [A1], to extend the licence duration by 1 year, to be valid to 2022 Dec 31.
24(2)	(b) containing the prescribed information and undertakings and accompanied by the prescribed documents; and	See response to item 24(2) (a) above.
24(2)	(c) accompanied by the prescribed fee.	CNL is in good standing with respect to the provision of CNSC licensing fees and will provide any additional fees, as and when required.
24(4)	No licence may be issued, renewed, amended or replaced unless, in the opinion of the Commission, the applicant (a) is qualified to carry on the activity that the licence will authorize the licensee to carry on; and	CNL understands that qualification will be determined through consideration by the Commission of this application and the associated supporting material as well as deliberation through the Commission hearing process.



Section	Requirement	CNL Response
24(4)	(b) will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.	CNL understands that adequate provision will be determined through consideration by the Commission of this application and the associated supporting material as well as deliberation through the Commission public hearing process.
24(5)	A licence may contain any term or condition that the Commission considers necessary for the purposes of this Act, including a condition that the applicant provide a financial guarantee in a form that is acceptable to the Commission.	CNL understands the requirement for an acceptable financial guarantee. While ownership of CNL has transferred to the Canadian National Energy Alliance, Atomic Energy of Canada Limited retains ownership of the lands, assets and liabilities associated with CNL's licences. These liabilities have been officially recognized by the Minister of Natural Resources in a letter dated 2015 July 31 [A2].
25	The Commission may, on its own motion, renew, suspend in whole or in part, amend, revoke or replace a licence under the prescribed conditions.	CNL understands the clause and no response is required.
General Nuclear Safety and Control Regulations		
3	(1) An application for a licence shall contain the following information: The applicants name and business address	No change to Name or business address as listed under Section II of the current PGP Licence [A1]: <i>Canadian Nuclear Laboratories Ltd. Laboratoires Nucléaires Canadiens Itée 286 Plant Road Chalk River, Ontario K0J 1J0</i>



Section	Requirement	CNL Response
3	(b) the activity to be licensed and its purpose;	No change to activity to be licensed as described under Section IV, of the PGP Licence [A1]: <i>The licence authorizes the licensee to conduct the following activities located in the Municipality of Clarington, Regional Municipality of Durham, Province of Ontario:</i> <i>(a) possess, package, transport, transfer, manage, and store nuclear substances, except Category I, II and III nuclear material as defined in section 1 of the Nuclear Security Regulations, that are required for, associated with or arise from the Port Hope Area Initiative - Port Granby Long-Term Low-Level Waste Management Facility, located in the Municipality of Clarington, Regional Municipality of Durham, Province of Ontario.</i>
3	(c) the name, maximum quantity and form of any nuclear substance to be encompassed by the licence;	No change to nuclear substances to be encompassed by the PGP Licence [A1].
3	(d) a description of any nuclear facility, prescribed equipment or prescribed information to be encompassed by the licence;	No Change to any facilities to be encompassed by the PGP Licence [A1].
3	(e) the proposed measures to ensure compliance with the Radiation Protection Regulations and the Nuclear Security Regulations;	Compliance with the <i>Radiation Protection Regulations</i> at the Port Granby Project is ensured through implementation of <i>Port Hope Area Initiative (PHAI) Radiation Protection (RP) Plan (PHAI RP Plan)</i> [A3], which is consistent with the corporate <i>Radiation</i>



Section	Requirement	CNL Response
		<p><i>Protection Program</i> [A4], [A5], as per Safety and Control Area (SCA) “Radiation Protection”, Licence Condition 5.1 of the <i>Port Granby Long-Term Low-Level Radioactive Waste Management Project Licence Conditions Handbook</i> (PGP LCH) [A6].</p> <p>Compliance with the <i>Nuclear Security Regulations</i> is ensured through implementation of the <i>Port Hope Area Initiative Security Plan</i> (PHAI Security Plan) [A7], which is consistent with the corporate <i>Security Requirements and Description Program Documents</i>, including SCA “Security”, Licence Condition 9.1 of the PGP LCH [A6].</p> <p>Compliance with the <i>Packaging and Transport of Nuclear Substances Regulations</i> is ensured through implementation of the <i>Port Hope Area Initiative (PHAI) Transportation of Dangerous Goods (TDG) Plan</i> (PHAI TDG Plan) [A8], which is consistent with the corporate <i>Transportation of Dangerous Goods Program</i> [A9], [A10] as per SCA “Packaging and Transport”, Licence Condition 10.1 of the PGP LCH [A6].</p>
3	(f) any proposed action level for the purpose of Section 6 of the Radiation Protection Regulations;	Radiation Protection action levels for the Port Granby Project site are defined under the <i>PHAI RP Plan</i> [A4], as per SCA “Radiation Protection”, Licence Condition 5.1 of the PGP LCH [A6].



Section	Requirement	CNL Response
3	(g) the proposed measures to control access to the site of the activity to be licensed and the nuclear substance, prescribed equipment or prescribed information;	Compliance with the <i>Nuclear Security Regulations</i> is ensured through implementation of the <i>PHAI Security Plan</i> [A7], which is consistent with the corporate <i>Security Requirements and Description Program Documents</i> , including SCA "Security", Licence Condition 9.1 of the PGP LCH [A6].
3	(h) the proposed measures to prevent loss or illegal use, possession or removal of the nuclear substance, prescribed equipment, or prescribed information;	<i>Security Requirements and Description Program Documents</i> , including SCA "Security", Licence Condition 9.1 of the PGP LCH [A6].
3	(i) a description and the results of any test, analysis or calculation performed to substantiate the information included in the application;	Information may be found in the 2011 Port Granby Licence application [A11].
3	(j) the name, quantity, form, origin, and volume of any radioactive waste or hazardous waste that may result from the activity to be licensed, including waste that may be stored, managed, processed, or disposed of at the site of the activity to be licensed, and the proposed method for managing and disposing of that waste;	Information on radioactive and hazardous wastes may be found in the 2011 Port Granby Licence application as noted above [A11].



Section	Requirement	CNL Response
3	(k) the applicant's organizational management structure insofar as it may bear on the applicant's compliance with the Act and the Regulations made under the Act, including the internal allocation of functions, responsibilities and authority;	CNL's senior management organizational structure for the operation of CRL is documented in the Management System manual [A12]. As per the requirements of SCA "Management System", Licence Condition 1.1 of the <i>Chalk River Laboratories (CRL) Nuclear Research and Test Establishment Operating Licence, NRTEOL-LCH-01.00/2028, Licence Conditions Handbook (LCH) (CRL LCH) [A13]</i> , further relevant information regarding the responsibilities and authority at the CRL site is provided in <i>Site Licences, Certificates, Permits, Building/Facility Contacts, & Licence Representatives</i> .
3	(l) a description of any proposed financial guarantee relating to the activity to be licensed; and	CNL understands the requirement for an acceptable financial guarantee. While ownership of CNL has transferred to Canadian National Energy Alliance, Atomic Energy of Canada Limited retains ownership of the lands, assets and liabilities associated with CNL's licences. These liabilities have been officially recognized by the Minister of Natural Resources in a letter dated 2015 July 31 [A2].



Section	Requirement	CNL Response
3	(m) any other information required by the Act or the Regulations made under the Act for the activity to be licensed and the nuclear substance, nuclear facility, prescribed equipment, or prescribed information to be encompassed by the licence.	<p>CNL understands this requirement and will provide any other additional information upon request.</p> <p>Substantiation of the information included with this application is demonstrated through the implementation of annual reporting requirements. An annual summary report of compliance monitoring and operational performance is submitted to CNSC staff, as per the requirement of SCA “Operating Performance”, Licence Condition 3.1 of the PGP LCH [A6].</p> <p>This report provides information on operational practices, maintenance of the facilities and the laboratories, and presents a summary of performance for each of the SCAs.</p>
3	<p>(1.1) The Commission or a designated officer authorized under paragraph 37(2)(c) of the Act, may require any other information that is necessary to enable the Commission or the designated officer to determine whether the applicant:</p> <p>(a) is qualified to carry on the activity to be licensed; or</p>	<p>CNL understands this requirement and will provide any other additional information upon request.</p> <p>The framework for CNL to carry out licensed activities is covered through the Management System manual [A12] and lower tier documents. The system describes the relevant statutory, regulatory, contractual, and corporate frameworks within which CNL exists and operates.</p>
3	(b) will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.	<p>CNL understands this requirement and will provide any other additional information upon request.</p> <p>Environmental protection at the PGP is ensured through implementation of the <i>Port Granby Project Environmental Protection Plan</i> [A14], and <i>Port Granby</i></p>



Section	Requirement	CNL Response
		<p><i>Project Environmental and Biophysical Monitoring Plan</i> [A15], in concurrence with the corporate <i>Environmental Protection Program</i> [A16], [A17] as above per (SCA) “Environmental Protection”, Licence Condition 7.1 of the PGP LCH [A6].</p> <p>Conventional health and safety at the PGP is ensured through implementation of the <i>Port Hope Area Initiative (PHAI) Occupational Safety and Health (OSH) Plan</i> [A20] in concurrence with the corporate Occupational Safety and Health Program [A21], [A22] as above (SCA) “Conventional Health and Safety”, Licence Condition 6.1 of the PGP LCH [A6].</p> <p>Safeguards and Non-Proliferation at CRL is ensured through implementation of the Nuclear Materials and Safeguards Management Program [A18], [A19], as above per (SCA) “Safeguards and Non-Proliferation”, Licence Condition 13.1 of the CRL LCH [A13].</p>
3	<p>(2) Subsection (1) does not apply in respect of an application for a licence to import or export for which the information requirements are prescribed by the Nuclear Non-Proliferation Import and Export Control Regulations, or in respect of an application for a licence to transport while in transit for which the information requirements are prescribed by the Packaging and Transport of Nuclear Substances Regulations.</p>	<p>CNL understands this requirement and will provide any other additional information upon request.</p> <p>Compliance is ensured through implementation of the Nuclear Materials and Safeguards Management Program [A18], [A19] as per above (SCA) “Safeguards and Non-Proliferation” Licence Condition 13.1 and the Transportation of Dangerous Goods Program [A9], [A10] as per SCA “Packaging and Transport”, Licence Condition 10.1, of the PGP LCH [A6].</p>



Section	Requirement	CNL Response
4	<p>An application for a licence to abandon a nuclear substance, a nuclear facility, prescribed equipment or prescribed information shall contain the following information in addition to the information required by Section 3 of the General Nuclear Safety and Control Regulations:</p> <p>(a) the name and location of the land, buildings, structures, components, and equipment that are to be abandoned;</p> <p>(b) the proposed time and location of the abandonment;</p> <p>(c) the proposed method of and procedure for abandonment; and</p> <p>the effects on the environment and the health and safety of persons that may result from the abandonment, and the measures that will be taken to prevent or mitigate those effects.</p>	<p>This is not an application for a licence to abandon a nuclear substance, a nuclear facility, prescribed equipment or prescribed information.</p>
5	<p>(a) the information required to be contained in an application for that licence by the applicable Regulations made under the Act; and</p>	<p>This attachment with the cover letter provides the information required by the NSCA (the Act) and the Regulations made pursuant to the Act and constitutes, in part, an application by CNL to amend its PGP Licence [A1], to extend the licence duration by 1 year, to be valid to 2022 December 31.</p>



Section	Requirement	CNL Response
5	(b) a statement identifying the changes in the information that was previously submitted.	No changes to the existing terms and conditions of the existing PGP Licence [A1] or to the associated PGP LCH [A6] are being requested, except to the proposed licence expiry date, to extend duration by 1 year, to be valid to 2022 December 31.
6	An application for the amendment, revocation or replacement of a licence shall contain the following information: (a) a description of the amendment, revocation or replacement and of the measures that will be taken and the methods and procedures that will be used to implement it;	This is not an application to amend, revoke or replace a licence. See response to item 5(a) above.
6	(b) a statement identifying the changes in the information contained in the most recent application for the licence;	CNL is not requesting changes in information contained in the PGP Licence [A1].
6	(c) a description of the nuclear substances, land, areas, buildings, structures, components, equipment and systems that will be affected by the amendment, revocation or replacement and of the manner in which they will be affected; and	CNL is not requesting a change to the PGP Licence [A1] with respect to nuclear substances, land, areas, buildings, structures, components, equipment and systems.
6	(d) the proposed starting date and the expected completion date of any modification encompassed by the application.	The expiry of date of the PGP Licence [A1] is 2021 December 31. CNL is requesting a 1 year extension, to be valid to 2022 December 31.



Section	Requirement	CNL Response
7	An application for a licence or for the renewal, suspension in whole or in part, amendment, revocation or replacement of a licence may incorporate by reference any information that is included in a valid, expired or revoked licence.	No changes to the existing terms and conditions of the existing PGP Licence [A1] or to the associated PGP LCH [A6] are being requested, except to the proposed licence expiry date, to extend duration by 1 year, to be valid to 2022 December 31.
15	Every applicant for a licence and every licensee shall notify the Commission of: (a) the persons who have authority to act for them in their dealings with the Commission;	CNL's Organizational structure for the operation of Port Granby is documented in the Management System manual [A13] and Site Licences, Certificates, Permits, Building/Facility Contacts, & Licence Representatives.
15	(b) the names and position titles of the persons who are responsible for the management and control of the licensed activity and the nuclear substance, nuclear facility, prescribed equipment or prescribed information encompassed by the licence; and	CNL's Organizational structure for the operation of Port Granby is documented in the Management System manual [A13] and Site Licences, Certificates, Permits, Building/Facility Contacts, & Licence Representatives.
15	(c) any change in the information referred to in paragraphs (a) and (b), within 15 days after the change occurs.	The Clause is understood, and no response is required.

Section	Requirement	CNL Response
Nuclear Substances and Devices Regulations		
3	1) An application for a licence in respect of a nuclear substance or a radiation device, other than a licence to service a radiation device, shall contain the following information in addition to the information required by	No changes to the existing terms and conditions of the existing PGP Licence [A1] or to the associated PGP LCH [A7] are being requested, except to the proposed licence expiry



Section	Requirement	CNL Response
	<p>section 3 of the General Nuclear Safety and Control Regulations:</p> <ul style="list-style-type: none">○ (a) the methods, procedures and equipment that will be used to carry on the activity to be licensed;	<p>date, to extend duration by 1 year, to be valid to 2022 December 31.</p>
	<ul style="list-style-type: none">○ (b) the methods, procedures and equipment that will be used while carrying on the activity to be licensed, or during and following an accident, to<ul style="list-style-type: none">▪ (i) monitor the release of any radioactive nuclear substance from the site of the activity to be licensed,▪ (ii) detect the presence of and record the radiation dose rate and quantity in becquerels of radioactive nuclear substances at the site of the activity to be licensed,▪ (iii) limit the spread of radioactive contamination within and from the site of the activity to be licensed, and▪ (iv) decontaminate any person, site or equipment contaminated as a result of the activity to be licensed;	<p>Compliance with Section 3 (a) to (k) of the General Nuclear Safety and Control Regulations at the Port Granby Project is ensured through implementation of <i>Port Hope Area Initiative (PHAI) Radiation Protection (RP) Plan</i> (PHAI RP Plan) [A3], which is consistent with the corporate <i>Radiation Protection Program</i> [A4], [A5], as per Safety and Control Area (SCA) “Radiation Protection”, Licence Condition 5.1 of the <i>Port Granby Long-Term Low-Level Radioactive Waste Management Project Licence Conditions Handbook</i> (PGP LCH) [A6].</p>



Section	Requirement	CNL Response
	(c) a description of the circumstances in which the decontamination referred to in subparagraph (b)(iv) will be carried out;	Please see response to 3 (b) above
	(d) the proposed location of the activity to be licensed, including a description of the site;	Please see response to 3 (b) above
	(e) the roles, responsibilities, duties, qualifications and experience of workers;	Please see response to 3 (b) above
	(f) the proposed training program for workers;	Please see response to 3 (b) above
	(g) the proposed instructions for dealing with accidents, including fires and spills, in which the nuclear substance may be involved	Please see response to 3 (b) above
	(h) the proposed inspection program for the equipment and systems that will be used to carry on the activity to be licensed;	Please see response to 3 (b) above
	(i) the methods, procedures and equipment that will be used to calibrate radiation survey meters in accordance with these Regulations;	Please see response to 3 (b) above
	(j) the methods, procedures and equipment that will be used to calibrate and verify the calibration of dosimeters referred to in paragraphs 30(3)(d) and (e);	Please see response to 3 (b) above
	(k) the methods, procedures and equipment that will be used to conduct the leak tests and surveys required by these Regulations;	Please see response to 3 (b) above
	(l) where the application is in respect of a nuclear substance that is an unsealed source and that is to be used in a room, the proposed design of the room;	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
	(m) if the application is in respect of a nuclear substance that is contained in a radiation device, the	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,



Section	Requirement	CNL Response
	brand name and model number of the radiation device, and the quantity of the devices;	
	<ul style="list-style-type: none"> ○ (n) where the application is in respect of Category I, II or III nuclear material, as defined in section 1 of the Nuclear Security Regulations, <ul style="list-style-type: none"> ▪ (i) the measures that will be taken to prevent nuclear criticality, and ▪ (ii) the information required by section 3 or 4 of the Nuclear Security Regulations, as applicable; 	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
	o) if the applicant will be manufacturing or distributing radiation devices referred to in paragraph 5(1)(c) or section 6 or 7, or check sources mentioned in section 8.1, the proposed procedure for the disposal of each radiation device or check source or for its return to the manufacturer.	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
3	b) plans showing the location, perimeter, areas, structures, and systems of the nuclear facility;	No changes to the conditions of the existing PGP Licence or to the associated PGP LCH are being requested.
3	(c) evidence that the applicant is the owner of the site or has authority from the owner of the site to carry on the activity to be licensed;	Atomic Energy of Canada Limited maintains the ownership of the Port Granby site and authorizes CNL to conduct licensed activities at the CNL site.
3	(d) the proposed quality assurance program for the activity to be licensed;	Information on the currently approved Historic Waste Program Quality Assurance Plan [A23] is noted.



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Section	Requirement	CNL Response
3	(e) the name, form, characteristics and quantity of any hazardous substances that may be on the site while the activity to be licensed is carried on;	CNL is not requesting a change to the PGP Licence [A1] with respect to form, characteristics and quantity of any nuclear substances. Information on radioactive and hazardous wastes may be found in the 2011 Port Granby Licence application [A11].
3	(f) the proposed worker health and safety policies and procedures;	Conventional health and safety at the PGP is ensured through implementation of the <i>Port Hope Area Initiative (PHAI) Occupational Safety and Health (OSH) Plan</i> [A20] in concurrence with the corporate Occupational Safety and Health Program [A21], [A22] as above (SCA) “Conventional Health and Safety”, Licence Condition 6.1 of the PGP LCH [A6].
3	(g) the proposed environmental protection policies and procedures;	Environmental protection at the PGP is ensured through implementation of the <i>Port Granby Project Environmental Protection Plan</i> [A14], and <i>Port Granby Project Environmental and Biophysical Monitoring Plan</i> [A15], in concurrence with the corporate <i>Environmental Protection Program</i> [A16], [A17] as above per (SCA) “Environmental Protection”, Licence Condition 7.1 of the PGP LCH [A6].
3	(h) the proposed effluent and environmental monitoring programs;	Information is provided in the <i>Port Granby Project Environmental Protection Plan</i> [A14], and <i>Port Granby Project Environmental and Biophysical Monitoring Plan</i> [A15] as noted above.
3	(i) if the application is in respect of a nuclear facility referred to in paragraph 2(b) of the Nuclear Security Regulations, the information required by Section 3 of those Regulations;	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,



Section	Requirement	CNL Response
3	(j) the proposed program to inform persons living in the vicinity of the site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the activity to be licensed; and	<p>Compliance with the requirements for notification to local residents and associated activities is ensured through implementation of the Public Information Program and Public Disclosure as per licence condition G.4 of the Port Granby LCH [A24].</p> <p>Additional compliance is ensured through the Emergency Preparedness Program as per SCA “Emergency Management and Fire Protection”, licence condition 8.1 of the Port Granby LCH [A25].</p>
3	(k) the proposed plan for the decommissioning of the nuclear facility or of the site.	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
14	(1) Every licensee shall keep a record of the results of the effluent and environmental monitoring programs referred to in the licence.	CNL understands the Clause and no response is required.
14	(2) Every licensee who operates a Class I nuclear facility shall keep a record of (a) operating and maintenance procedures;	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
14	(b) the results of the commissioning program referred to in the licence;	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
14	(c) the results of the inspection and maintenance programs referred to in the licence;	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
14	(d) the nature and amount of radiation, nuclear substances and hazardous substances within the nuclear facility; and	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,
14	(e) the status of each worker's qualifications, requalification and training, including the results of all	This is not applicable to the Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021,



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Section	Requirement	CNL Response
	tests and examinations completed in accordance with the licence.	



References:

- [A1] *Port Granby Long-Term Low-Level Radioactive Waste Management Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021*, Expiry Date: 2021 December 31.
- [A2] G. Rickford (NRCAN), letter to M. Binder (CNSC), *untitled, relating to provision of financial guarantees for CNL sites in Canada*, 145-NRCANNO-15-0001-L, 2015 July 31.
- [A3] *Port Hope Area Initiative Radiation Protection Plan*, 4500-508740-PLA-001, Revision 5, 2019 July.
- [A4] *Radiation Protection*, 900-508740-PRD-001, Revision 3, 2018 June.
- [A5] *Radiation Protection Program Description Document*, 900-508740-PDD-001, Revision 0, 2017 March.
- [A6] Canadian Nuclear Safety Commission, *Port Granby Long-Term Low-Level Radioactive Waste Management Project Licence Conditions Handbook, WNSL-W1-LCH-2311.02*, Revision 2, 2019 April 23.
- [A7] *Port Hope Area Initiative Security Plan*, 4500-508710-PLA-001, Revision 1, 2017 February.
- [A8] *Port Hope Area Initiative Transportation of Dangerous Goods Plan*, 4500-508520-PLA-001, Revision 4, 2018 June.
- [A9] *Transportation of Dangerous Goods Program Requirements Document*, 900-508520-PRD-001, Revision 2, 2021 January.
- [A10] *Transportation of Dangerous Goods Program Description Document*, 900-508520-PDD-001, Revision 1, 2019 November.
- [A11] *Licence Application for The Port Granby Long-Term Low Level Radioactive Waste Management Project, Licensing Package*, 4502-508760-LP-001, Revision 0, 2011 July 29.
- [A12] *Management System*, 900-514100-MAN-001, Revision 1, 2020 August.
- [A13] *Chalk River Laboratories Nuclear Research and Test Establishment Operating Licence, NRTEOL-LCH-01.00/2028, Licence Conditions Handbook, CRL-508760-HBK-002*, Revision 2, 2021 February 28.
- [A14] *Port Granby Project Environmental Protection Plan*, 4502-508120-041-000, document series.
- [A15] *Environmental and Biophysical Monitoring Plan, Port Granby Project*, 4502-509247-PLA-001, Revision 1, 2019 January.
- [A16] *Environmental Protection Program Requirements Document*, 900-509200-PRD-001, Revision 2, 2018 May.



- [A17] *Environmental Protection Program Description Document*, 900-509200-PDD-001, Revision 2, 2018 July.
- [A18] *Nuclear Materials and Safeguards Management Program Requirements Document*, 900-50510-PRD-001, Revision 2, 2019 March.
- [A19] *Nuclear Materials and Safeguards Management Program Description Document*, 900-508510-PDD-001, Revision 2, 2020 April.
- [A20] *Port Hope Area Initiative (PHAI) Occupational Safety and Health (OSH) Plan*, 4500-510400-PLA-001, Revision 2, 2017 December.
- [A21] *Occupational Safety and Health Program Requirements Document*, 900-510400-PRD-001, Revision 1, 2017 April.
- [A22] *Occupational Safety and Health Program Description Document*, 900-510400-PDD-001, Revision 2, 2018 April.
- [A23] *Historic Waste Program Quality Assurance Program*, 236-514200-QAP-001, Revision 0, 2018 March 26.
- [A24] *Port Hope Area Initiative Phase 2 Public Information Program*, 4500-513000-PLA-003, Revision 2, 2016 August 22.
- [A25] *Port Hope Area Initiative Emergency Plan*, 4500-508730-PLA-001, Revision 2, 2017 November 03