



**Written submission from the
Canadian Association of Nuclear
Host Communities**

**Mémoire de la
Canadian Association of Nuclear
Host Communities**

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

H A R D Y S T E V E N S O N A N D A S S O C I A T E S

October 14, 2021

Mayor Adrian Foster
Chair, Canadian Association of Nuclear Host Communities
C/O The Municipality of Clarington
40 Temperance Street
Bowmanville, ON L1C 3A6

Re: CANHC CNSC Intervention for Canadian Nuclear Laboratories' Application to Renew the Licence for the Port Granby Long-Term Low-Level Radioactive Waste Management Project

Please find included in this memo a review of Canadian Nuclear Laboratories' (CNL) application to the Canadian Nuclear Safety Commission (CNSC) for renewal of their Port Granby Long-Term Low-Level Radioactive Waste (LLRW) Management Project licence. CNL has reviewed the requirements under the Nuclear Safety Control Act, as well as other CNSC regulations that may be relevant, and provided responses on how it will still meet the requirements given the Port Granby Project's works over the next year. In general, I believe that CNL has adequately analyzed the potential impacts of their works on human health and the environment, and I agree with their findings and experiences that these works will not have any effects that cannot be mitigated safely.

As this application is for a renewal of the existing licence, and since the PGP will not be expanding any of its current site activities, then as long as the PGP meets its licence conditions, the Canadian Association of Nuclear Host Communities (CANHC) should not have any concerns with the proposed year licence extension. With the transition to Phase 3, and the next licence hearing, CANHC will have, in addition to human health and safety, and environmental considerations, an interest in any changes to the socio-economic effects of this transition, including ongoing employment estimates, traffic and road impacts, other infrastructure impacts, and any changes to host community agreements. CANHC will also have an interest in any changes that could affect the agreement between Canada (represented by Atomic Energy of Canada Ltd.) and the Municipality of Clarington for some of the existing waste management facility lands, and adjacent lands, to become a nature reserve.

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Below are some comments on hearing documentation provided by both CNL, and CNSC Staff. Please note that information provided in the CNL application is very limited, and details are in referred documents, which were not provided or reviewed for this application.

Environmental Assessment

The PGP takes place on property abutting the bluffs of Lake Ontario, so there is always a lot of public scrutiny on any affects to the bluffs, shoreline, water quality, and other aquatic effects. Water management is in place to collect any potentially contaminated water, which is processed through the on site waste water treatment plant (WWTP) before being released. CNSC staff note that there have been no exceedances of release limits from the WWTP since effluent limit criteria were established in 2017. However, the CNSC notes that the Port Granby site did encounter an unplanned water discharge in the West Gorge in 2017 due to a blocked pipe, but the effect of the released water was below on site radiation levels, and CNL took corrective action to ensure that there would not be any further unplanned discharges, as well as mitigation measures should another event occur. CNSC notes that it is satisfied with the mitigation measures taken by CNL.

Other environmental monitoring, including dust, noise, flora, fauna, and aquatic, has also been undertaken by both CNL as proponent, and CNSC as an independent verification. Results have shown to be within predicted meaning that health and the environment has been adequately protected during the project.

CANHC and its members will remain interested in any potential environmental effects the project could have on the local environment. While not directly referred to in the application, CANHC should also be interested in any changes that may occur to traffic.

Health and Safety

CNL is required to follow health and safety regulations under the Nuclear Safety Control Act, as well as any applicable federal and provincial regulations. During the COVID-19 pandemic, CNL established new procedures and protocols.

The only noted health and safety incident occurred in 2019 when a worker was injured in the operation of a roll-off bin truck. This incident had all CNL sites across Canada suspend use of the type of truck in question until a proper investigation was done, and then CNL introduced a new protocols, information, and training related to the equipment. CNSC reviewed the mitigation measures and actions taken by CNL, and noted them appropriate.

CANHC should continue to be kept informed, through notification and consultation, that CNL is undertaking on site health and safety measure seriously and appropriately.

Engagement and Consultation

CNL continues to engage with public and government stakeholders at various meetings, while providing public access to some CNL documents and environmental monitoring results on their website, and updates via social media.

CANHC should ensure that it, and the host communities associated with the PGP, remain engaged and consulted as plans are developed for the Phase 3.

Changes to the Licence and Licence Conditions Handbook

Since CNL's application is for a licence extension, and does not include any changes to the current licenced works, CNL and CNSC have not proposed any changes to the above noted licencing documents, other than expiry date. Upon review of the proposed draft LCH, there were no additional changes.

Transition to Phase 3 Works

As CNL transitions from Phase 2, the construction phase, to Phase 3, long-term monitoring, it is important that the project does not transition to any new processes or criteria that is outside of the established processes for Phase 2. CNL will be required to go to the CNSC for a Phase 3 licence.

CANHC should request to participate in the hearing in 2022, when the PGP licence for Phase 3 will likely be merged with the licence for the Port Hope Project (which is still in its Phase 2).

Conclusion

Thank you for allowing me to review this information on your behalf. Based on the provided information, I do not see any substantial issues to human health and the environment related to the proposed site works, and believe that CANHC should support CNL's CNSC application. Please note that, while I have reviewed the information that CNL provided in their documents, I have not reviewed the data or methodologies, and rely upon CNL's expertise in the formation of their conclusions.

Kind regards,



Lauren Wingham-Smith, P. Eng.