Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

CMD 21-H102.5

File/dossier : 6.01.07
Date : 2021-10-18
e-Docs pdf : 6662219

Written submission from the Canadian Nuclear Association

Mémoire de l' Association nucléaire canadienne

In the Matter of

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

À l'égard de

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

Canada

canadian nuclear association cna anc association nucléaire canadienne

October 18, 2021

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 request for a short-term licence renewal for its Port Granby Project

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 short-term licence renewal for the Port Granby Project.

As the Commission knows, the Port Granby Project is part of the Port Hope Area Initiative (PHAI). The Port Granby Project is being conducted in three distinct phases and is currently in Phase II. This phase involves the construction of a long-term waste management facility (LTWMF), construction and operation of a waste water treatment plant (WWTP) and remediation of the Port Granby Waste Management Facility (WMF). Phase II is nearing completion and CNL's current expectation is to proceed to Phase III in the spring of 2022. Phase III is the post closure phase and involves long-term monitoring and maintenance of the LTWMF and WWTP.

The request before the Commission is a 1-year licence renewal with no changes to the authorized activities, terms and conditions of the existing licence or the licence conditions handbook. The only change would be a proposed expiry date of December 31, 2022 instead of the current expiry date of December 31, 2021.

The purpose of this request is to align the licence expiry date for the Port Granby Project with the expiry date of the waste nuclear substance licence for the Port Hope Project. This would allow CNL to propose the consolidation of both licences into a single waste nuclear substance licence for both projects going forward. This consolidation would reduce the administrative burden of having different licenses for similar projects under the PHAI. All expectations for the Safety and Controls Areas (SCAs) will remain unchanged.

It is important to note that should the short-term licence be granted, a full public hearing will take place in 2022 to consider a longer-term application. An in-depth assessment of all SCAs will be part of that hearing.

It is equally important to note that as part of this application, CNSC staff has reviewed the licensee's performance over the current licence period. CNL has received an annual rating of "satisfactory" for all applicable SCRs. In addition, CNSC staff have confirmed that CNL conducted the authorized activities within the licensing basis requirements and has ensured that its programs protect the safety of workers, the public and the environment.

Given that the only requested change in this renewal application is an extension of the expiry date and considering CNL's proven track record of safe operations and the potential benefits of consolidating licences (after a full hearing), the CNL would encourage the Commission to approve CNL's request for a short-term licence renewal.

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

Sincerely,

John Gorman
President and Chief Executive Officer
Canadian Nuclear Association