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Written submission from Kinectrics Inc.

Mémoire de Kinectrics lnc.

In the Matter of the

À l'égard de

Canadian Nuclear Laboratories

Laboratoires Nucléaires Canadiens

Application to renew its waste nuclear substance licence for the Port Hope Project

Demande concernant le renouvellement du permis de déchets de substances nucléaires pour le projet de Port Hope

Commission Public Hearing

Audience publique de la Commission

November 22, 2022

22 novembre 2022





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October 14, 2022

Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
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CNSC Public Hearing, Canadian Nuclear Laboratories' application to renew its Waste Nuclear Substance Licence for the Port Hope Project, Ref. 2022-H-13

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' strong support for Canadian Nuclear Laboratories' (CNL) application to renew its Port Hope Project waste nuclear substance licence and consolidate the four licences associated with the Port Hope Area Initiative (PHAI) portfolio. Currently, CNL's four licences under the PHAI portfolio authorize CNL to perform clean-up and manage historic low-level radioactive waste found in the Municipalities of Port Hope and Clarington.

Kinectrics is a proudly Canadian company committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters are in Etobicoke, Ontario, with offices in Pickering, Toronto, Bruce County, Saint John, the United States, Germany, Denmark, Romania, the United Kingdom and India. We have over 30 laboratories, including CNSC licensed facilities and employ more than 1,100 staff, 70% of whom have technical, science or engineering degrees.

At Kinectrics, we invest in state-of-the-art facilities and tools to provide our customers with the best and most comprehensive services. Our laboratories offer testing facilities for a broad range of areas that support the nuclear industry, including materials analysis, nuclear radiation safety, and chemical analysis. Our world-class experts deliver services including project management and controls, design engineering and nuclear safety analysis and licensing. In addition to supporting CNL in these areas, we provide similar services to OPG,



Bruce Power, Hydro One, other provincial and local utilities, and over 200 clients elsewhere in North America, Europe, the Middle East and Asia.

Kinectrics has provided several essential services which have contributed to CNL's research and development program and the continued safe operation of CNL. For example:

- Assessments and analyses in support of CNL Safety Report updates;
- Hazard identification and analysis of CNL facilities;
- Third Party Review of CNL design strategies to ensure it meets regulatory requirements and applicable codes and standards;
- Fabrication of plant materials for research and development purposes;
- Materials test and analyses of plant components to characterize performance under various plant conditions; and
- Laboratory analysis of radioactive samples.

In providing these services to CNL, Kinectrics staff have interfaced closely with CNL staff at various levels across their facilities. We can confirm that their commitment to health and safety as core values is deeply embedded in all their work. The execution of PHAI by CNL on behalf of the Government of Canada is a remarkable example of CNL's commitment to community and environmental stewardship. Through the implementation of PHAI, CNL is effectively remediating the environment from historic low level waste and addressing the community's request for a safe, local, long term solution. As such, we strongly support the 10-year licence renewal for the PHAI portfolio of projects to benefit the environment and community.

Kinectrics greatly supports creating and sustaining high-quality jobs and fostering economic growth within the local community. The PHAI has been and will continue to create job opportunities in a wide range of fields, including construction, engineering, landscaping and administration. In addition, many CNL staff working on the project live in the local region, buy or rent homes in the area, shop locally and participate in community events making the social fabric and strengthening the local economy.

CNL has demonstrated a strong commitment to Public and Indigenous engagement throughout the PHAI project. CNL works closely with the local and Indigenous communities to ensure their rights, values and interests are represented. CNL has implemented multiple approaches in various mediums for meaningful engagement and understanding of the licence renewal application, as discussed in WNSL-W1-2310.02/2022. Furthermore, CNL has demonstrated a commitment to advancing Reconciliation through meaningful actions and a continued move towards increased inclusion. As a proud member of the Canadian Council for Aboriginal Business (CCAB), which aims to strengthen the relationship between Aboriginal and non-Aboriginal peoples, businesses, and communities, Kinectrics is pleased



with CNL's commitment to building relationships with First Nations and Métis communities through open, honest and transparent communication and education about their values and interests.

In summary, by working closely with CNL and understanding their core values and safety culture, we are confident CNL is capable of continued safe operation of its Port Hope Area revitalization project. On this basis, we support CNL's application to renew its Port Hope Project waste nuclear substance licence and consolidate the four licences associated with the Port Hope Area Initiative portfolio.

If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or david.harris@kinectrics.com.

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Sincerely,

David Harris

President and CEO

Kinectrics Inc.