



Oral presentation

Exposé oral

Written submission from the Canadian Nuclear Association

Mémoire de l' Association nucléaire canadienne

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

October 13, 2022

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 to renew its waste nuclear substance licence for the Port Hope 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 including the safe management of nuclear waste and as such are supportive of Canadian Nuclear Laboratories (CNL) application to renew its waste nuclear substance licence for the Port Hope Area Initiative Project (PHAI).

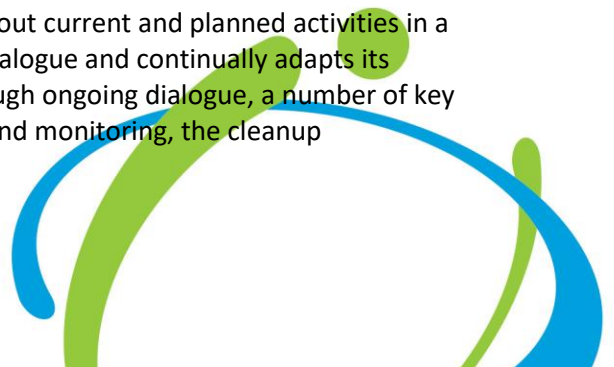
As the Commission knows, the PHAI represents the Government of Canada's commitment to provide a solution for the cleanup and long-term safe management of approximately 1.7 million cubic metres of historical low-level radioactive waste in Port Hope and Port Granby. CNL is implementing this plan on behalf of the Government of Canada.

CNL currently has four licences associated with this project. This application requests that the four licences be consolidated into a single 10-year licence as well as including changes to the Licence Condition Handbook.

Combining project licences will ensure efficiencies are applied to the PHAI in alignment with CNL's Management System and enhance effective management by reducing the administrative burden of holding several licences for projects of similar scope. A 10-year licence period will provide certainty to CNL as it continues the plan including the completion of remediation and restoration activities in Port Hope and the transition to Phase 3 of the Port Granby Project.

The PHAI takes place on the traditional territory of the Wendat, Anishinabek Nation and the territory covered by the Williams Treaties with the Michi Saagiig and Chippewa Nations. CNL has demonstrated that it is committed to building an ongoing meaningful relationship with Indigenous communities and organizations to gain an understanding of traditional knowledge as well as any potential impacts of the project on Indigenous and/or treaty rights.

CNL is committed to sharing accurate, up-to-date information about current and planned activities in a timely manner. CNL recognizes the need for open, transparent dialogue and continually adapts its approach to reflect the interest and needs of communities. Through ongoing dialogue, a number of key issues have been identified including environmental protection and monitoring, the cleanup



amendment, economic opportunities and heritage resource protection. CNL is committed to working with Indigenous communities to address these concerns.

CNA believes that CNL has demonstrated a strong commitment to the community through its comprehensive Public Information Program (PIP) which ensures effective communication with the communities. CNL staff shares information through email, telephone, drop-in meetings, through advertising and via social media. A dedicated website was developed to provide updates including upcoming work, environmental monitoring reports and public disclosures. In addition, the PHAI has dedicated Facebook and Twitter sites. Local political, business and community leaders also receive direct regular updates.

CNA has reviewed CNL's application and would like to highlight the following key points:

- Like all members of the Canadian nuclear industry, CNL is committed to the safety of workers, the public and the environment. Health and safety are core CNL values and CNL strives for a culture of safety excellence through practical application, training and by encouraging employees to make conservative decisions guided by safety.
- CNL has a robust environmental protection program for all operations and activities around the PHP including monitoring for air quality, dust, noise, surface/ground water and soil. Results are reported regularly and are publicly available. In addition, a dedicated team of radiation specialists ensure the rigour of the Radiation Protection Plan.
- Over the course of the project, CNL has effectively managed project challenges including substantial increase in anticipated volumes of waste and they have safely completed the remediation of waste at the former Port Granby Waste Management Facility and at several sites in Port Hope. CNL continues to apply lessons learned and utilizes effective adaptive management practices to evaluate and manage the complex nature of the PHAI.

CNA has also reviewed CNSC staff's assessment and agree with staff's conclusion that CNL is qualified to carry on the activity authorized by the licence and will continue to make adequate provision for the protection of the environment and the health and safety of persons. Therefore, the CNA would strongly encourage the Commission to approve CNL's request for a consolidated 10-year waste nuclear substance licence for the Port Hope Area Initiative.

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

Sincerely,



Steve Coupland



Director of Regulatory and Environmental Affairs
Canadian Nuclear Association