



Oral presentation

Exposé oral

**Written submission from
Sandra Holmes**

**Mémoire de
Sandra Holmes**

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 1, 2022

Office of Secretariat,
Canadian Nuclear Safety Commission,
280 Slater Street
Ottawa, On, Canada
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To whom it may concern:

I am intervening regarding the Port Hope Area Initiative CNL licence for both the Port Hope and Port Granby Projects and the modification of the Clean-up Criteria for the Port Hope Project.

I feel I am in a unique position to comment, as I have been involved in the projects in some way for almost 50 years. My parents owned and operated a business in Port Hope during the discovery of low-level radioactive waste and the intense media attention that followed. Their building and land were part of the initial cleanup. (1970's)

As a young mom, I became a member of the Port Hope Community Liaison Group, that worked under the Siting Task Force, charged with finding a community to host the waste through cooperation. (1980's 1990's) When this endeavour did not result in a solution for the waste, I became one of two community members on the Port Hope Advisory Committee, to consider hosting the waste within the community of Port Hope. The principals developed by this committee were a local solution, on existing contaminated land, built aboveground to allow the waste to be isolated from the environment and retrievable, and allow unrestricted use to all remediated properties for the foreseeable future.

The result of this work, along with similar groups in Hope Township and Clarington was the basis of the Legal Agreement that launched the Port Hope Area Initiative. In 2001 I joined the PHAI in communications, until I retired in 2016.

So, my background and dedication to the safe removal and storage of historic low-level radioactive waste within my community, gives me a strong and determined voice in favour of the continuation of the cleanup.

The Port Hope Area Initiative is founded on community concepts and based on extensive environment assessments. Over 200 meetings, workshops, and one-on-one opportunities for input with community members were the basis of this thorough document. Visitors from other projects around the world often remark on the unprecedented communication and consultation involved.

The project, that will in many ways touch every resident and business in Port Hope, is built on a strong foundation of consensus.

But many years have passed since that first intense media scrutiny and the initial cleanup. Residents that spearheaded the need for a once and for all cleanup have, like me, got older. Many are no longer with us. I feel the need to evoke their memories and strongly recommend the renewal of the Port Hope Area Initiative licence to continue to remediate, transport and store the historic low-level radioactive waste safely in the Municipality of Port Hope.

By consolidating the licences into one Waste Nuclear Substance Licence the CNSC will allow the continuation of the Port Hope Project until it too reaches the milestone of monitoring and maintenance stage that the Port Granby project has now achieved.

I would also like to comment on the revision currently under consideration by the CNSC regarding amendments to the Clean-up Criteria. Again, I harken back to history. When the initial 100,000 cubic metres of waste was removed from Port Hope homes, businesses and public spaces, many residents considered the cleanup complete.

The existence of the Low-Level Radioactive Waste Management Office and their continuous monitoring, management of temporary storage facilities, construction monitoring program and the issuing of the Radiological Status Letter for Port Hope properties, allowed development within the community, and a sense of security that everything was safe, but it was never a long-term solution.

Once the Port Hope Area Initiative was launched, and the realization of a long-awaited cleanup a reality, residents and members of municipal council wanted assurance that Port Hope was never going to be dug up, radiologically monitored, or the centre of negative media attention again. This was going to be the final cleanup.

The result of this desire was intense participation and scrutiny into the development of the cleanup criteria.

Background levels for the contaminants of potential concern – radium, thorium, uranium, and arsenic – were put forward by local dedicated residents, and seriously considered to be necessary.

The ramifications of cleaning to background levels, were detailed in presentations, newsletters and many discussions and the result is a compromise that became the existing clean up criteria. At the time, this very conservative criteria met the wishes of the community.

Now the reality and results of this is readily apparent, where cleanup activities have taken place. The depth of soil removed, the extent of disruption to property owners and the removal of trees has shown that although based on the community's desire at the time, the criteria is now, not meeting the spirit of the foundation principals.

Agreeing to the proposed changes to the arsenic cleanup criteria will allow the project to move forward in a timely and considerably less disruptive manner. While maintaining the spirit of the principals. I support the serious consideration the CNSC is giving to the modification of Cleanup Criteria for the Port Hope Project and hope that my reflections provide some history and context and will be considered during the up coming deliberations.

I strongly support the issuing of a 10 year Waste Nuclear Substance Licence to CNL for the Port Hope and Port Granby projects.

Sincerely,

Sandra Holmes