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Written submission from the Fleming College, Environmental Technician/Technology Program

In the Matter of the

Canadian Nuclear Laboratories

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

Commission Public Hearing

November 22, 2022

Exposé oral

Mémoire du Fleming College, Environmental Technician/Technology Program

À l'égard de

Laboratoires Nucléaires Canadiens

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

Audience publique de la Commission

22 novembre 2022

Canada

October 3, 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON, K1O 5S9

Re: Canadian Nuclear Laboratories' Application for a 10-year renewal of the Port Hope Project Waste Nuclear Substance Licence for the completion of the Port Hope Area Initiative.
Reference Number: 2022-H-13

Dear Secretariat,

I am pleased to provide this letter of support in response to the call for interventions related to the above-mentioned matter. The School of Environmental and Natural Resource Science, Environmental Technician/Technology program at Sir Sandford Fleming College (Fleming College) supports the application made by Canadian Nuclear Laboratories (CNL) for a 10-year renewal of the licence to continue the clean-up or historic low-level radioactive waste in Port Hope, Ontario as part of the Port Hope Area Initiative (PHAI).

The School of Environmental and Natural Resource Science at Fleming College is an internationally recognized educational institution located at the Frost Campus, in Lindsay, Ontario, which is less than a one-hour commute to the Port Hope area. The school offers diverse programming and unique combination of hands-on applied learning, paid co-ops and work placements for students. Learning experiences focus on the environment and natural resources sectors and offers Diploma programs such as Environmental Technician/Technology, Forestry Technician, Geological Technician, Ecosystem Management Technician/Technology, and Post-Graduate Certificate programs such as Advanced Water Systems Operations and Management Co-op, Geographic Information Systems – Application Specialist and Sustainable Waste Management.

Fleming College has developed a cooperative relationship with the Port Hope Area Initiative project through a recognized Memorandum of Understanding (MOU), which was formalized in March 2013. The intent of the MOU is to develop an active and supportive relationship within which the respective organizations identify and act on opportunities to work productively and

cooperatively on projects of mutual benefit. Specifically, the Environmental Technician/Technology program has taken significant advantage of the MOU and has been quite involved with the Port Hope Area Initiative project since 2012 through Field Trips, Customized Training Workshops, Guest Lectures, Community Information Sessions, and Campus Tours. As a faculty member and representative of the Environmental Technician/Technology program, I have witnessed the positive advancements of the PHAI project through our collaborative working relationship.

Due to my professional involvement with the PHAI; I am aware that this unique project represents the Government of Canada's commitment to respond to the community-requested solution for the clean-up and safe, local long-term management of significant quantities of historic, low-level radioactive waste in the Port Hope and Port Granby areas. It is my understanding that the Port Granby project has been recently completed. The Port Granby project involved the safe excavation and transfer of low-level radioactive waste to a constructed waste management facility similar to the scope of the Port Hope project. The 10-year licence renewal will allow CNL to continue the PHAI project and ensure that the remediation and restoration activities in Port Hope and the transition to the long-term monitoring phase of the Port Granby project are completed under one licence.

During annual field trip visits to the project area, I have witnessed the significant economic and social benefits for the community resulting from the PHAI project through expanded job creation, infrastructure upgrades and economic spin-offs. The creation of job opportunities has significantly benefited graduates from the Environmental Technician/Technology program at Fleming College. Program alumni are currently working in technical positions with CNL and several PHAI-based sub-contractors. Many of these technical positions are related to environmental monitoring for air quality, dust, noise, surface/groundwater and soil to ensure the project is being completed in a safe and environmentally sound manner. The project has also been an inspiration for local residents to pursue higher education in the environmental field due to the significant public outreach programs which are communicated to local residents, stakeholders, indigenous communities and community partners.

I feel it is important to note that the PHAI project is a welcomed local solution to a long-standing human caused environmental issue. Through the advancement of the PHAI project, CNL is conducting a number of environmentally beneficial activities as part of their Environmental and Biophysical Monitoring and Environmental Protection Plan such as:

- Actively treating wastewater generated at the long-term management sites and then measuring the volume of (treated) clean water discharged to Lake Ontario.
- Conducting water sampling at the long-term waste management facilities and major clean-up sites.
- Preserving mature trees where possible and mitigating the loss of trees through replanting programs using same species or similar native species.
- Remediating sediments within the Port Hope harbour and establishing habitat improvements during restoration activities.
- Removal of low-level radioactive wastes located on public and private properties and restoration with clean soil, and appropriate landscaping plans.
- Identification of sensitive features at small-scale work sites and species at risk within the project work areas to provide appropriate protection and mitigation measures.

These environmental activities collectively enhance the protection of the great lakes basin ecosystem and ensure that the project has an overall net-positive ecosystem-based impact. I understand that CNL has met the regulatory environmental protection requirements and that CNSC staff have concluded the same.

Through my interactions with PHAI staff, it is quite apparent that Health and Safety are core CNL values, and the entire organization has committed to meet all of their health and safety obligations to protect workers, public members and the environment. As part of the extensive work program, a comprehensive Quality Assurance Program aligned with ISO 9001:2015 Quality Management Systems – Requirements standard has been implemented as part of the PHAI project to ensure safe conditions through rigorous control procedures.

The 10-year licence renewal will allow CNL to continue their safe work practices to provide economic, social, and environmental benefits to the Port Hope community and leave a respectable legacy related to the low-level radioactive waste management practices for future generations.

On behalf of the Environmental Technician/Technology program at Fleming College, I formally submit this letter of support for the 10-year licence renewal application.

I would like to thank you for the opportunity to intervene with respect to this matter.

Best regards,

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