



Oral presentation

Exposé oral

**Written submission from
Benjamin Benson**

**Mémoire de
Benjamin Benson**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories (CNL)

Laboratoires Nucléaires Canadiens (LNC)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May and June 2022

Mai et juin 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

Date April 11th 2022

Re: Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site licence to authorize the construction of a **near surface disposal facility** (IAA Reference Number: 80122)

Dear Secretariat:

My name is Benjamin Benson, and I live on the outskirts of the town of Deep River. My home is very close to the Chalk River Labs property on the Ottawa River. It's so close that I occasionally see CNL staff taking water samples from Balmer Bay, as one of their more westerly sample points. I have worked at CRL for 12+ years as an engineering technologist. I started in R&D in a reactor component department, and I now work in waste management operations. As part of my job as a waste management technical officer I have learned all about our current and historic waste practices.

I believe NSDF is the right solutions for LLW **disposal**. Currently there is a lot of LLW **management** in bunkers, shipping-containers, and buildings such as the SMAGS warehouses. These buildings and containers are plagued with moisture and condensation issues that degrade the waste packages over time; **a better solution is needed now** before these interim solutions break down any more.

I see a lot of public misconception that we are **creating** more nuclear waste with the NSDF project. This is not true; what we are doing is trying to **clean up historic waste**. Much of this historic waste has been dumped straight into the ground, or is contained in leaky old abandoned buildings and tanks.

Another common misconception is that the NSDF is too close to the river; this false narrative has been pushed by the 'Ottawa RiverKeepers'. The NSDF will be in a totally different water table than the Ottawa River, and will allow our current liabilities to be moved further away from the river. The River Keeper's publications also imply that the waste should be moved to a new, uncontaminated site far from the river – this is a silly and naive idea. The CRL site already has major ground contamination from the cold-war ear waste free-for-all, such as the liquid dispersal pits. Building NSDF here makes the most sense. If NSDF eventually leaks, it would be like adding a few drops to an already full bucket. I did write the RiverKeepers in an attempt to stop their unhelpful mis-information campaign, but I received no reply. More public awareness of the historic waste practices and current land contamination would help people understand why **an engineered LLW disposal site on the CRL site is the right solution**.
(eg: [Chalk River's toxic legacy | Ottawa Citizen](#), Dec 15 2011).

Thank you for providing the opportunity to intervene in this matter,
M. Benjamin T. Benson