



**Written submission from the  
Cleanup Function at CNL**

**Mémoire de la  
Fonction de nettoyage des LNC**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories (CNL)**

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**Laboratoires Nucléaires Canadiens (LNC)**

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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**



2022-04-11

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

**Subject: 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:

On behalf of the Canadian Nuclear Laboratories' (CNL) Cleanup Function, I am submitting this letter of positive intervention in support of CNL's application to amend the Chalk River Laboratories (CRL) site license to authorize construction of the Near-Surface Disposal Facility (NSDF).

The CNL Cleanup Function is responsible for providing consistent processes and procedures to enable all CNL sites and projects to establish and meet the right next land uses and end-states for the decommissioning of buildings and environmental remediation of lands impacted by past, present and future operations by CNL. We have a team of experts in decommissioning and environmental remediation many of whom have worked inside and outside of the nuclear industry. We as a team have a common goal to restore and protect Canada's environment and are passionate about our work and taking care of the area where we live.

In the context of the Chalk River Laboratories site, which is predominantly where the team members are based, we are developing the Overview Decommissioning and Cleanup Plan. This plan covers the decommissioning and environmental remediation activities that are required to ensure legacy liabilities produced over the past 70 plus years of operation at the site are not left for future generations to deal with. The NSDF Project is a key facility needed to enable the cleanup of the CRL site.

As decommissioning and environmental remediation professionals, our team has followed the development and progression of the NSDF Project with interest, recognizing the continuous improvement and refinement of the design and licensing basis. At this time, based on our

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experiences and knowledge gained, we offer our support for the NSDF Project. Our support is based on the following elements of the Project:

- The NSDF Project provides the development of a disposal capability that is critical to minimizing the burden of existing legacy liabilities on future generations.
- The NSDF is a technology-based solution that enables an improved long-term and permanent safety posture for AECL and CNL. The NSDF Project has leveraged lessons learned from across the international nuclear industry, has partnered with industry (public, private and academic) organizations to refine and optimize the lifecycle plan, and has leveraged the significant knowledge from experts with a wide range of specialized knowledge.
- The NSDF Project will make a significant contribution to safely manage nuclear liabilities that have already been created at CNL sites. Meaning that environmental remediation will be able to take place, minimizing risk to the environment and continuing to ensure protection of people and biota.
- The NSDF is a proven, safe and sustainable solution designed to reduce health and environmental risks associated with waste materials currently stored at CRL in several waste management areas that do not meet current disposal standards.
- The NSDF is underpinned by sound science and engineering. It will provide a safe and effective disposal route for future liabilities created in support of the ongoing efforts to provide cleaner energy and advance nuclear medicinal sciences.

CNL, through funding and oversight by AECL, continues to provide significant benefits to the people of Canada and the world. CNL continues to be a pioneer in the international nuclear science community, and the approval of the application to construct the NSDF will position CNL for a continued long-term future as a nuclear innovator.

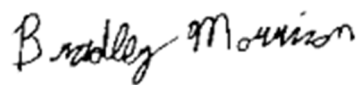
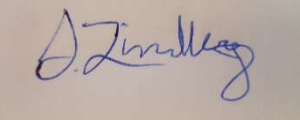


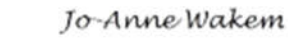


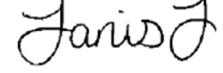

Thank you for providing the opportunity to intervene in this matter,

Grace Snell.  
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2022-04-11

**Co-Signed by the following employees from the Cleanup Function:**

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