Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

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Written submission from Rena Ginsberg and Boyd Reimer

Mémoire de Rena Ginsberg et Boyd Reimer

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

Canada

Date: April 11, 2022

To: Canadian Nuclear Safety Commission

From: Rena Ginsberg and Boyd Reimer

Re: Ref. 2022-H-07

We are providing a written submission only, as follows.

We wish to express our strong opposition to the Canadian Nuclear Laboratories application to construct a near surface disposal facility at Chalk River, Ontario.

Our reasons for opposing this application are:

1. The proposed giant landfill – slated to contain up to one million tons of radioactive and other hazardous waste – would be less one kilometre from the Ottawa River, a drinking water source for millions of Canadians.

2. To make matter worse, the proposed site is tornado and earthquake prone; the Ottawa River itself is on a major fault line. The site is partly surrounded by wetlands and the underlying bedrock is porous and fractured.

3. The mound would contain hundreds of radioactive materials, dozens of hazardous chemicals and tons of heavy metals. The radioactive materials would include tritium, carbon-14, strontium-90, four types of plutonium (one of the most dangerous radioactive materials if inhaled or ingested), and up to 80 tons of uranium. Twenty-five out of the 30 radionuclides listed in the reference inventory for the mound are long-lived, so the dump would remain dangerously radioactive for 100,000 years.

4. The mound would leak radioactive and hazardous contaminants into the Ottawa River both during operation and after closure. The many ways the mound would leak are described in the environmental impact statement. The mound is expected to eventually disintegrate in a process referred to as “normal evolution.”

5. There is no safe level of exposure to the radiation that would leak into the Ottawa River from the Chalk River mound. All of the escaping radioactive materials would increase risks of birth defects, genetic damage, cancer and other serious diseases.

6. According to the International Atomic Energy Agency (IAEA), radioactive waste must be carefully stored out of the biosphere, not in an above-ground mound. The IAEA says only Very Low Level Radioactive Waste (VLLW) can be put in an above-ground landfill-type facility. If Canada allows this dump to be licensed, it will be shirking its obligations as a member state of the IAEA and a signatory to an international nuclear waste treaty.

7. The Chalk River mound would not reduce Canada's $8 billion federal radioactive waste liabilities and could in fact increase them. The giant pile of leaking radioactive waste would be difficult to remediate. Remediation costs could exceed those of managing the wastes had they not been put in the mound.

8. The Kebaowek First Nation, on whose unceded territory the dump would be situated, has asked for the hearings to be suspended until a consultation framework between them and the CNSC is established. Meaningful dialogue regarding any government decision affecting Indigenous lands and rights is constitutionally required.

9. As well, the Assembly of First Nations and more than 140 Quebec and Ontario municipalities have passed resolutions opposing the Ottawa River nuclear waste dump.

We therefore urge the CNSC to adjourn these hearings until there have been meaningful consultations with the Kebaowek First Nation and until there has been a more rigorous examination of the risks involved in this proposal. We furthermore urge the CNSC to consider other sites and means of disposal to ensure that our nuclear waste is handled in a way that protects future generations and complies with Canada's commitment to uphold the standards of the International Atomic Energy Agency.