



**Written submission from the
Power Workers' Union**

**Mémoire du
Syndicat des travailleurs et
travailleuses du secteur énergétique**

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

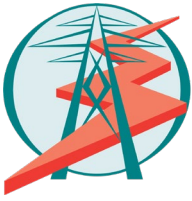
Demande des LNC visant à modifier le permis
du site des Laboratoires de Chalk River pour
autoriser la construction d'une installation de
gestion des déchets près de la surface

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May and June 2022

Mai et juin 2022



POWER WORKERS' UNION

Members of the Commission
c/o Louise Levert
Senior Tribunal Officer, Commission Secrétariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
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Via email to Interventions@cnsccsn.gc.ca

Reference 2022-H-07

Power Workers' Union submission to the Canadian Nuclear Safety Commission regarding Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories' Site Licence to authorize the construction of a Near Surface Disposal Facility.

1. The Power Workers' Union

The Power Workers' Union represents more than 18,000 Members employed throughout Ontario's electricity sector, including Ontario's nuclear facilities at Darlington, Pickering, Bruce and Chalk River. At CNL-CRL the PWU represents Nuclear Operators. The PWU is a strong advocate of nuclear power as a vital source of clean, reliable, emission-free electricity and recognizes the importance of low-cost, low-carbon energy to Ontario's economic well being.

The PWU has been an active participant in the regulatory oversight process for nuclear facilities in the province of Ontario for decades. The PWU regularly participates in CNSC public hearings/meetings for all of Ontario's nuclear generating sites and Canadian Nuclear Laboratories facilities. <https://www.pwu.ca/>

2. CNL's Application

The CRL site is located adjacent to the Ottawa River in the Town of Deep River, Ontario. The site is owned by Atomic Energy of Canada Limited (AECL), a federal Crown corporation and operated by CNL under a contract arrangement. CNL applied to the CNSC to construct a Near Surface Disposal Facility for the permanent, safe disposal of solid low-level radioactive waste at CRL.

In 2016 CNL submitted the project description for the proposed NSDF to the CNSC and in 2017 submitted a licence application for the construction of the proposed NSDF. The PWU had questions about the project and, along with the Canadian Nuclear Workers' Council (CNWC) and other Unions at CNL-CRL, asked CNL for more information. On June 17, 2018 we had a meeting with an overview of the proposed NSDF project along with a tour of the proposed site. All questions and concerns were addressed to our satisfaction. On March 26, 2021 an updated application was submitted.

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We understand the proposed NSDF is considered a Class IB nuclear facility and is subject to a licensing regulatory review under the Nuclear Safety and Control Act (NSCA) and to an environmental assessment (EA) under the Canadian Environmental Assessment Act, 2012 (CEAA 2012).

The PWU has been following the EA as it has progressed and received updates from CNL. In preparation for this submission we reviewed the updated application from CNL dated 26 March 2021, the submission from CNL for Part 1 of the Public Hearing, CMD 22-H7.1, and related presentation, CMD 22-H7.1A.

The PWU supports CNL's application.

CNSC Staff's Assessment of CNL's application

The PWU reviewed the submission from CNSC Staff for Part 1 of the Public Hearing, CMD 22-H7, and the related presentation, CMD 22-H7A. We believe that CNSC Staff considered the appropriate information and reached the appropriate findings and conclusions, specifically:

- An EA under CEAA 2012 was conducted for the proposed NSDF Project.
- CNSC Staff determined that the proposed NSDF Project is not likely to cause significant adverse environmental effects.
- CNSC Staff determined that the proposed NSDF project is protective of people and the environment.
- CNSC Staff concluded that CNL's licence application to construct the NSDF at the CRL site complies with all applicable regulatory requirements.
- CNL has made adequate provision for the protection of the environment and the health and safety of persons.
- The proposed NSDF is suitable for permanently containing and isolating the waste during the time the waste's radiological hazards remain.
- Regulatory oversight will continue throughout the lifecycle of the project.

We support CNSC Staff's recommendations, specifically:

- On the EA decision under CEAA 2012, recommendation that the Commission determine that the NSDF Project is not likely to cause significant adverse environmental effects.
- On the licensing decision under the NSCA, recommendation that the Commission approve CNL's application to construct the NSDF and amend the CRL operating licence by including 2 new facility-specific licence conditions.

4. Conclusion

The PWU would like to note the vital importance of Canada's nuclear industry for the reliable generation of electricity without greenhouse gas emissions, the production of medical isotopes, high-quality employment, economic growth and helping address climate change. CNL is a crucial element of Canada's nuclear industry and the success of the NSDF is important for all of us.

The PWU has worked with AECL/CNL for decades. CNL has mature, successful programs in place to effectively manage all Safety and Control Areas (SCAs) and we have no reason to believe that will not continue with the NSDF.

The PWU supports the assessment, conclusions and recommendations of CNSC Staff as set out in CMD 22-H7.

In conclusion, the PWU supports CNL's application for an amendment to its Chalk River Laboratories NRTEOL to authorize construction of the proposed near surface disposal facility.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Jeff Parnell', written in a cursive style.

Jeff Parnell
President