



**Written submission from
Benjamin Rouben**

**Mémoire de
Benjamin Rouben**

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

2022 March 26

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:

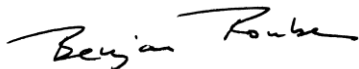
I would like to submit a written intervention for the CNSC's public hearing on May 31, 2022, on Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility.

My name is Benjamin Rouben. I am a nuclear reactor physicist. I worked at Atomic Energy of Canada Limited in Sheridan Park, Ontario, from 1975 to 2007. I was head of Reactor Physics at the time of my retirement. Since 2007, I have been an Adjunct Professor teaching reactor physics, nuclear-power-plant operation and related subjects at McMaster University and the University of Ontario Institute of Technology.

I believe that the proposed near surface disposal facility (NSDF) is a very good proposal for the permanent disposal of low-level radioactive waste. This is much preferable to the current storage on the surface, which is temporary and which may require intervention in the case of negative events at the surface, for example contaminated groundwater plumes. I believe that the NSDF, as a safe, well designed and engineered facility, will permanently protect the environment from the low-level radioactive waste. I have confidence that the engineered mound in the NSDF has been well designed to provide a permanent barrier and will protect against extreme events, e.g., severe storms, tornadoes, fires, or earthquakes. It will provide very good protection for the site, as well as for the Ottawa River and downstream communities. It is also very comforting that the barrier system for the NSDF has already undergone rigorous materials testing at Queen's University.

Based on my education and career as a physicist, I have a life-long interest in nuclear technology and its safe use. In my time at AECL, I had many opportunities to meet colleagues at Chalk River Laboratories, and I have a continued interest in the safety of the site. And more basically, as a concerned citizen, I have an abiding interest in the safe use of any technology. In this context, the NSDF represents an improved and permanent solution to what is to be done with low-level radioactive waste.

Thank you for providing the opportunity to intervene in this hearing.



Benjamin Rouben, PhD, FCNS
North York, ON