

File / dossier : 6.01.07 Date: 2022-04-05 6756795 Edocs:

Written submission from **AECOM Canada Ltd.**

Mémoire d' **AECOM Canada Ltd.**

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





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Canadian Nuclear Safety Commission Headquarters 280 Slater Street Ottawa, ON K1P 5S9 April 5, 2022

Dear Ms. Lisa Thiele,

Subject: Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility (2022-H-07)

AECOM has been an active participant in the NSDF project as the Designer for the facility. We have worked closely with CNL regarding appropriate changes and suggestions made throughout the 5-year engineering period leading up to this regulatory submission. We have brought both local and International best practice experience into the design process to ensure environmental and human safety during operations and long-term post-closure monitoring.

AECOM is writing to you in support of CNL's application to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility. We have observed firsthand that CNL has operated and maintained facilities under its authority in a manner that meets obligations and expectations under its operating license. More important we observe and appreciate their excellent nuclear safety culture. Furthermore, we believe that CNL has met all environmental and licensing application requirements in its submission and believe that this project should be supported based on the above.

The proposed NSDF is an important step in allowing for the environmental remediation of low-level radioactive waste generated through decades of work done by AECL/CNL in the Nuclear Industry. It allows for the permanent disposal of these wastes and provides for safe disposal solution for today and for future generations. It further mitigates the risks associated with the current temporary storage program employed today.

We are confident that the facility design and proposed construction meets the requirement laid out in the Canadian Nuclear Safety Commission's (CNSC Reg Doc-2.11-1) Framework for Radioactive Waste Management and Decommissioning in Canada & International Atomic Energy Agency (IAEA) GSG-1, Classification of Radioactive Waste.

Should you need any additional written interventions from me in advance of the public hearing please feel free to contact me.

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Sincerely,

Carl Danie, M.A.Sc., P.Eng.

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