



**Written submission from
BWXT Canada Ltd.**

**Mémoire de
BWXT 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



April 8, 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: cns.interventions.ccsn@canada.ca

Subject: Canadian Nuclear Laboratories application to amend nuclear research and test establishment operating licence for the Chalk River Laboratories site to authorize the construction of a near surface disposal facility - Ref. 2022-H-07

Dear President and Commission Members,

I am writing on behalf of BWXT Canada Ltd. (BWXT) to express our support for Canadian Nuclear Laboratories' (CNL) application to the Canadian Nuclear Safety Commission (CNSC) to amend its nuclear research and test establishment operating licence for the Chalk River Laboratories (CRL) site to authorize the construction of a near surface disposal facility (NSDF).

BWXT is a longstanding and trusted global supplier of nuclear components, fuel, services and medicine and operates 10 locations across Canada with approximately 1500 skilled employees. CRL is the birthplace of CANDU® technology which has enabled the production of clean, safe and affordable electricity since the 1970s. CRL is also the Canadian centre of excellence for nuclear science which generated life-saving medical isotopes used across 80 countries for millions of patients during the operation of the National Research Universal reactor.

A modernized solution for low-level waste

The research and development of these innovative solutions for clean air and patient health has created radioactive waste, which has been safely and responsibly stored by CNL in accordance with regulatory requirements. CNL is looking to modernize the management of this waste through the revitalization of CRL to create a world-class nuclear research centre of which the NSDF will be an integral component. The NSDF will provide a safe and environmentally responsible solution for the disposal of debris and building materials that are classified as low-level waste.

Waste Management that is protective of the environment

The NSDF has been designed to protect the environment from contamination, including the Ottawa River. CNL produces comprehensive annual reports on its environmental monitoring program which it has overseen for over six decades. Over 400 sampling locations around CRL undergo environmental monitoring, producing approximately 5000 samples per year. CNL also publishes results annually on its website. CNL's environmental monitoring will be expanded to include the NSDF project to ensure continued environmental oversight.

Regulatory rigor will ensure the safe operation of the NSDF

Canada's nuclear industry is one of the most highly regulated industries in the world. As the origin of nuclear technology in Canada, CNL regularly and directly contributes to meeting Canada's regulatory obligations for nuclear safety, security, non-proliferation and emergency preparedness. Whether working with the International Atomic Energy Agency on opportunities for improvement in national security to developing new technology that improves emergency preparedness, CNL is the hub of nuclear innovation in Canada and a world-leader in nuclear technology for peaceful applications. This depth of experience and expertise will be applied to the safe operation of the NSDF to ensure regulatory compliance throughout the project lifecycle.

Dedication to Public Information and Indigenous Engagement

BWXT applauds CNL's comprehensive and inclusive Public Information Program which ensures community members receive the information they need to stay informed regarding CNL-managed sites. Through use of various outreach activities and communication tools, CNL has reached out to Indigenous communities and the public to inform and engage them regarding the NSDF project. Over 25 public information sessions, 50 presentations and tours, 15 community events and 21 webinars were held to provide ample opportunity for public engagement, which was continued virtually during the pandemic when in-person engagement was not possible.

BWXT has utmost confidence in CNL's commitment to safely operate a NSDF at CRL

BWXT fully understands that CNL is Canada's authority on the safe handling and storage of radioactive waste. CNL's proposed permanent solution for the safe disposal of low-level waste with the NSDF is one backed by several commitments. For the entire lifecycle of the NSDF, CNL commits to applying modern waste management standards and technologies to reduce potential risk; continued engagement with the public and Indigenous communities; protection of the environment and human health; and periodic reviews and updates regarding safety through the licensing stages. It is for these reasons and our confidence in CNL's nuclear site management that we strongly support CNL's application to amend its nuclear research and test establishment operating licence for the CRL site to authorize the construction of a NSDF.

BWXT thanks the CNSC for this opportunity to intervene in writing.

Sincerely,



John MacQuarrie
President
BWXT Commercial Operations