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Written submission from the Women in Nuclear Canada

Mémoire de Women in Nuclear Canada

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 Sent via email to interventions@cnsc-ccsn.gc.ca

April 8th, 2022

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,

Women in Nuclear (WiN) Canada is pleased to submit a written intervention in support of Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories site licence in order to authorize the construction of a Near Surface Disposal Facility (NSDF).

Established in 2004, WiN Canada today has over 4,000 members across Canada. Our members work in the nuclear industry and many live in the communities in which the nuclear industry operates. Safety and the environment are always an important consideration for our members. We place a high priority on the safety of communities in which we live, work, and raise our families. As women working in the nuclear industry, we value the role nuclear energy plays in a net-zero carbon future. The role of nuclear energy in Canada is critical to our success in reaching our net-zero carbon goals by 2050. Canada's nuclear industry makes an important contribution to reducing greenhouse gas (GHG) emissions. "Women are disproportionally affected by the impacts of climate change all over the world. Women's traditional roles as the primary users and managers of natural resources, primary caregivers, and keepers of the home mean they are involved in and depend on livelihoods and resources that are put most at risk by climate change" (Canada.ca, 2019). A clean-energy future is important to women everywhere. Approval of this licence based on the data submitted demonstrates the need for this facility in order to align with having a clean future in Canada.

CNL has proven that NSDF is considered a key facility that is needed to conduct environmental remediation of contaminated soils and materials that are already present at the Chalk River Laboratories (CRL) site. This is required in order to protect the environment, including the Ottawa River. The NSDF will represent a permanent solution to reduce environmental risk and isolate low-level radioactive waste, in accordance with international guidance and regulatory requirements. Based on the provided information, the NSDF is designed to be safe and secure against extreme weather conditions; proven to have an engineered containment mound that is internationally recognized as best practice for low-level radioactive waste disposal; and having a barrier system that has undergone rigorous materials testing. This is considered a long-term solution to Canada's growing problem of where to store its low-level waste.





WiN Canda is supportive of the NSDF attentiveness to the environment since there is a focus on cleaning their site and placing waste in a modern, engineered facility while using the best-available technology. Additionally, the ground-breaking science and technology is appreciated since it positively impacts the community and future generations. This is achieved by enabling researchers to advance clean energy technology and contribute to medical breakthroughs, improve economic development in local communities by expanding operations and employment at Chalk River Laboratories, and overall helping take care of the environment now to avoid future implications.

Locally, Women in Nuclear Canada has an Eastern Ontario Chapter that contributes to bringing together and represents the mission and vision of the organization. The Eastern Ontario Chapter provides support and awareness to both professionals and companies to create a supportive network to attract, retain and grow the number of women working in the nuclear industry. Our organization and members are key players in the implementation of initiatives that improve gender equality and foster the professional development of women in the mining and nuclear industries.

CNL's submission has demonstrated a sustained commitment to ensuring the safe reliable long-term operation of a NSDF, which develops the ability to properly dispose waste in a highly engineered facility built to last. It is evident that CNL is taking accountability for the waste now, instead of leaving it for future generations. Based on the research provided, NSDF is considered an appropriate solution that will be protective of people and the environment. It represents the guiding principle in CNL's decision to use the NSDF design. It is for these reasons that Women in Nuclear (WiN) Canada supports CNL's application for amending its Chalk River Laboratories site licence in order to authorize the construction of a NSDF.

Respectfully,

Lisa McBride

President, Women in Nuclear Canada

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