



**Written submission from  
NB Power**

**Mémoire d'  
Énergie NB**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories (CNL)**

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**Laboratoires Nucléaires Canadiens (LNC)**

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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

Canadian Nuclear Safety Commission  
Registrar/Secretariat  
280 Slater Street P.O. Box 1046  
Ottawa, ON  
K1P 5S9  
[interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

Attention: Senior Tribunal Officer

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

Please accept this letter as written intervention in the Canadian Nuclear Safety Commission's (CNSC) hearing to consider the application by Canadian Nuclear Laboratories (CNL) to amend its licence to construct a near surface disposal facility (NSDF) at the Chalk River Laboratories (CRL) site.

New Brunswick Power supports CNL's application to construct the NSDF to provide a safe, permanent solution to manage the existing and future low-level radioactive waste at the CRL site. Please consider the text of this letter as our written intervention.

**About New Brunswick Power**

New Brunswick Power (NB Power) is the primary electric utility in the province of New Brunswick. Our more than 2,600 employees are dedicated to providing expert service and safe, reliable electricity at low and stable rates. In 2020, we celebrated our 100<sup>th</sup> anniversary of proudly serving the people of New Brunswick.

We are responsible for the generation, transmission, and distribution of electricity from our 13 generating facilities across the Province, including the Point Lepreau Nuclear Generating Station (PLNGS). PLNGS is a 660 megawatt (net) nuclear generating station and a base load contributor to the New Brunswick electricity grid. The station has safely generated non-emitting energy for almost four decades and today provides more than one third of the electricity used in New Brunswick.

**CNL - a rich legacy of nuclear expertise**

CNL is a world leader in nuclear research and technology advancements for the benefit of Canada and the world. For close to eight decades, the workers at CRL have led the world in ground-breaking nuclear innovations. These include the production of medical isotopes that have improved the lives of millions of people in Canada and worldwide, and the CANDU reactors that continue to generate more than 60 percent of Ontario's electricity – clean, emission-free energy.

As a result of this tremendous legacy of work, waste and by-product materials exist at the site, some of which are radioactive. In addition, there are other sites to which the Canadian Government has the responsibility to safely dispose of the waste. The proposed NSDF will allow CNL to permanently manage and dispose of the low-level waste using international best practices.

### **Importance of safely and responsibly managing waste**

The members of the Canadian nuclear industry, including NB Power and CNL, pride themselves on being good stewards of the environment. That includes not only operating today with a focus on safety and environmental protection, but also considering potential impacts for the entire life cycle of a facility or project. Responsible nuclear waste management includes the funding and management of the full life cycle of materials and by-products, from generation to disposal.

To date, CNL has been safely storing low-level waste. We applaud and support CNL for taking the responsible, proactive steps to ensure the permanent safe disposal of their low-level waste by advancing the NSDF project, to ensure the long-term protection of the public and surrounding environment.

### **NSDF technology**

CNL has conducted extensive comprehensive studies, employing international expertise and best practices, which has resulted in the identification of a technological solution that offers best available technology for long-term waste management.

The engineered containment mound, the proposed technology for the NSDF, is internationally recognized as best practice for low-level radioactive waste disposal. The barrier system for the NSDF has undergone rigorous materials testing at Queen's University in Kingston, Ontario.

CNL's environmental impact statement (EIS) documents the results of their extensive studies, some of which have been peer reviewed by international experts. The EIS demonstrates the NSDF project will offer the best available solution to ensure the safety of the public and the surrounding environment, including the protection of the Ottawa River.

### **Indigenous and public engagement**

At NB Power, we understand and appreciate the importance of meaningful engagement and communication with First Nations communities and the public, to earn and maintain our social licence. We believe CNL shares this same commitment and practice.

CNL has been engaging with the public and Indigenous communities for more than six years in support of the NSDF project to ensure a wide range of perspectives are incorporated into the planning and design for this facility. A wide range of outreach activities were employed - and continue today - including public information sessions, presentations, community events and open houses.

Engagement activities with Indigenous communities are documented in CNL's Indigenous Engagement Report, to ensure their interests are well-represented and important traditional knowledge is included.

### **Rigorous regulatory framework**

We understand the NSDF will be a licensed nuclear facility under Canada's Nuclear Safety and Control Act, meaning all aspects of the construction and future operation of this facility must meet the stringent regulations set by the CNSC and be subject to the ongoing rigorous oversight of the regulator.

We have confidence in the comprehensive regulatory process in Canada and trust this application will be reviewed against sound and scientific-based criteria, with the primary goal of ensuring the safety of all Canadians and the environment. We appreciate the opportunity to participate in this important process.

### **Conclusion**

In conclusion, NB Power supports CNL's application to construct the NSDF at the Chalk River Laboratories site. Based on their extensive studies and research documented EIS, we believe CNL has identified a technological approach incorporating international best practices, which will protect the ongoing safety of the public and surrounding environment.

The Canadian nuclear industry has a sustainable plan to manage waste generated in our industry. The NSDF project is a key part of this sustainable plan.

Please feel free to contact Kathleen Duguay, NB Power's Manager of Community Affairs and Nuclear Regulatory Protocol, should you have questions or require additional information about our intervention.

Sincerely,



Mark Power  
Site Vice President  
Point Lepreau Nuclear Generating Station

cc: K. Duguay, J. Nouwens