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Oral presentation

Written submission from Nuclear Waste Management Organization Exposé oral

Mémoire de la Société de gestion des déchets nucléaires

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





Laurie Swami PRESIDENT AND CEO Tel. 647.259.3010 Email lswaml@nwmo.ca

April 8, 2022,

NWMO-CORR-00531-301635

Senior Tribunal Officer, Secretariat Canadian Nuclear Safety Commission 280 Slater Street P.O. Box 1046, Station B Ottawa, Ontario K1P 5S9

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:

My name is Laurie Swami, and I am the President and CEO of the Nuclear Waste Management Organization (NWMO). The NWMO is a not-for-profit organization implementing Canada's plan for the safe, long-term management of Canada's used nuclear fuel, in a manner that protects people and the environment for generations to come. For the past 20 years, the NWMO has been at the forefront of nuclear waste management in Canada and is recognized internationally for our leadership.

I am writing in support of Canadian Nuclear Laboratories' (CNL) application to construct a near surface disposal facility (NSDF), because I believe it is of critical importance that Canada have a safe, secure, and scientifically sound long-term approach to managing each of the country's nuclear waste streams, including low-level radioactive waste. If approved, the NSDF would represent a second success in Canada's plans for the long-term management of radioactive waste, following the success of the Port Granby repository for low-level contaminated soil.

The NSDF is necessary to enable CNL to conduct environmental remediation of contaminated soils and materials that are already present at the Chalk River Laboratories (CRL) site to protect the environment, including the Ottawa River. It is also required for the disposal of more than 70-years of low-level waste, which is currently in interim storage.

NWMO has reviewed CNL's submissions and the reviews by CNSC staff, and note it is evident that drinking water in any location downriver is not at risk, and in fact, the proposed project will enhance the level of protection. The site is on a bedrock ridge that naturally forces water away from the river. The NSDF will also feature an advanced wastewater treatment system.

Based on my own experience at the NWMO building public support for the management of used nuclear fuel, I know that protecting our water resources is of key importance to many Canadians and Indigenous peoples. Indeed, this public priority has been consistent throughout my career working at the forefront of addressing environmental concerns around nuclear energy projects.

The facility is also designed to withstand extreme weather events and the impacts of climate change to ensure it is safe over the very long term. The proposed engineered containment mound is consistent with proven, international best practice for low-level radioactive waste disposal and the barrier system has undergone rigorous materials testing.

The Chalk River Laboratories site is also a source of unique nuclear science in Canada, producing important research in health science in areas such as cancer and other diseases, and it is helping drive advances in clean, non-carbon energy to combat climate change. The NSDF will allow it to continue this important work and remain on the leading edge of tomorrow's ground-breaking science.

Given the necessarily long timelines for implementation of nuclear waste management projects, it is important that Canada act now and not leave it to future generations. We need a permanent solution to manage Canada's low-level radioactive waste and ensure its safety in the long-term.

Regardless of the future of nuclear energy in Canada, the reality of the waste the sector has already produced remains. As a country that values sustainability, safety and security, projects that present real solutions to the issues associated with nuclear waste management are necessary to protect people and the environment. While the NWMO's work will address the issue of used nuclear fuel management, projects like CNL's NSDF will ensure we are prepared to deal with the full picture of the nuclear industry's waste.

Thank you for providing the opportunity to intervene in this matter,

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Laurie Swami President and CEO

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