



**Written submission from the  
Fuel Program and Projects Division  
at CNL**

**Mémoire de la  
Division du programme et projets  
combustibles des LNC**

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**



2022-04-08

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:

On behalf of the Canadian Nuclear Laboratories' (CNL) Fuel Program and Projects Division, I am submitting this letter of positive intervention in support CNL's application to amend the Chalk River Laboratories (CRL) site license to authorize construction of the Near-Surface Disposal Facility (NSDF).

The CNL Fuel Program and Projects Division is responsible for developing and implementing an integrated strategy for the lifecycle management of AECL-owned used fuel and co-stored Intermediate-Level Waste (ILW) liabilities at sites across Canada. Our Division is comprised of Engineers, Scientists, Technicians, and Project/Business Professionals from across Canada and various other countries. Most of our team have spent most of their careers working in the nuclear industry, developing technical knowledge and experience.

As nuclear industry professionals, our Team has followed the development and progression of the NSDF Project, recognizing the continuous improvement and refinement of the design and licensing basis. At this time, based on our experiences and knowledge gained, we offer our support for the NSDF Project. Our support is based on the following elements of the Project:

- The development of a disposal capability is critical to minimizing the burden on future generations. The NSDF is focused on Low-Level Radioactive Waste, and this helps create the precedent for higher hazard radioactive wastes, such as the Deep Geological Repository proposed by the Nuclear Waste Management Organization as part of the Adaptive Phased Management approach. This focus on disposal is also reflected in

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286 Plant Road  
Chalk River, Ontario  
Canada K0J 1J0  
Telephone: 613-584-3311  
Toll Free: 1-866-513-2325

Laboratoires de Chalk River  
286, chemin Plant  
Chalk River (Ontario) K0J 1J0  
Canada  
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Sans frais: 1-866-513-2325



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Natural Resource Canada's draft on *Modernizing Canada's Policy for Radioactive Waste and Decommissioning*.

- The NSDF is a technology-based solution that enables an improved long-term and permanent safety posture for AECL and CNL. The NSDF Project has leveraged lessons learned from across the international nuclear industry, has partnered with industry (public, private and academic) organizations to refine and optimize the lifecycle plan, and has leveraged the significant knowledge from experts with a wide range of specialized knowledge.
- The NSDF Project represents a significant financial investment to manage nuclear liabilities that have already been created at CNL sites. The investment of hundreds of millions of dollars into the NSDF Project (and significantly more for the lifecycle operation, closure, and post-closure monitor of the NSDF) represents AECL and the Government of Canada's commitment to appropriate funding levels for effective management of nuclear liabilities.

CNL, through funding and oversight by AECL, continues to provide significant benefits to the people of Canada and the world. The NSDF is a solution informed and underpinned by sound science, engineering and experience. It enables safe stewardship of liabilities created over the past seventy (70) years of meaningful work. It also creates a safe and effective disposal route for future liabilities created in support of the ongoing efforts to provide cleaner energy and advance nuclear medicinal sciences.

CNL continues to be a pioneer in the international nuclear science community, and the approval of application to construct the NSDF will position CNL for a continued long-term future as a nuclear innovator.





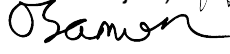




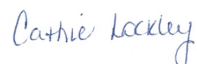



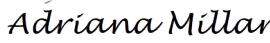
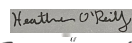


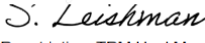

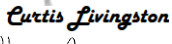





Thank you for providing the opportunity to intervene in this matter,

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Canadian Nuclear Laboratories  
Chalk River Laboratories, Ontario, Canada  
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2022-04-08

**Co-Signed by the following employees from the Fuel Program and Projects Division:**

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