CMD 22-H7.85

File / dossier : 6.01.07 Date: 2022-04-11 Edocs: 6757761

Written submission from Aecon

Mémoire d' Aecon

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

April 10, 2022

Subject: Support of 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:

Please accept this as Aecon's written submission of support for Canadian Nuclear Laboratories (CNL) to obtain Canadian Nuclear Safety Commission (CNSC) regulatory approval to amend its site licence to authorize the construction of the Near Surface Disposal Facility (NSDF).

Aecon is a Canadian leader in construction and infrastructure development with over 10,000 employees, and the largest nuclear constructor in the country. Aecon Nuclear, which employs about 3,000 skilled workers and staff, provides a full spectrum of Engineering, Procurement and Construction (EPC) services. We have a long-standing relationship with the nuclear industry and continue to work on large complex nuclear projects, with a critical role in the ongoing success of the two largest nuclear refurbishment projects in Ontario, in addition to nuclear maintenance, manufacturing, and decommissioning services.

The Canadian nuclear industry provides significant and diverse benefits to the country, including clean and reliable electricity, good quality & high skills jobs, and medical innovations to diagnose diseases, treat illnesses and sterilize medial equipment.

CNL is conducting the largest and most complex nuclear remediation project in Canada across four provinces and territories. The NSDF will be the key enabling facility to support environmental remediation of contaminated soils and various materials that are already present at Chalk River Laboratories and addresses Canada's legacy waste liabilities while restoring and protecting the environment for future generations.

To remain on the leading edge of ground-breaking science, CNL is also revitalizing the Chalk River Laboratories campus. The site is Canada's largest science and technology complex and is a source of unique nuclear science in Canada, producing valuable research in health science, and making advances in clean, non-carbon energy to combat climate change for today and for tomorrow.



In addition, Aecon supports CNL's licence amendment for the following notable reasons:

- The NSDF will provide a long-term solution to Canada's growing problem of low-level waste storage to take care of the environment now, and not bequeath the issue to future generations.
- The NSDF will enable CNL to revitalize the Chalk River Laboratories, advance clean energy technology, help combat climate change, and contribute to medical advances by providing a permanent solution for building debris and other waste materials.
- The engineered containment mound is internationally recognized as best-practice for low-level radioactive waste disposal.
- CNL values safety, environmental protection, quality, and accountability and has had an established environmental monitoring program in place for over 60 years, which will be expanded to include specific monitoring related to the NSDF.
- The construction of the NSDF will produce jobs for skilled workers and socio-economic benefits for the region.

Aecon firmly supports CNL's application to obtain CNSC regulatory approval to amend its site licence to authorize the construction of a near surface disposal facility.

Thank you for providing us with the opportunity to intervene in this matter.

Sincerely,

Jerome Clavel

Senior Vice President, Nuclear

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