Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

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Supplementary Information

Renseignements supplémentaires

Presentation from the Canadian Nuclear Workers' Council

Présentation du Conseil canadien des travailleurs du nucléaire

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 30 to June 3, 2022

30 mai au 3 juin 2022

Canada

Canadian Nuclear Workers Council (CNWC)

Conseil Canadien des Travailleurs du Nucleaire (CCTN)

Canadian Nuclear Workers' Council

Canadian Nuclear Safety Commission Public Hearing, Part 2

Pembroke, Ontario
31 May 2022

Application from Canadian Nuclear Laboratories (CNL) to amend its Chalk River Laboratories (CRL) site licence to authorize the construction of a Near Surface Disposal Facility (NSDF)

Canadian Nuclear Workers' Council

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Canadian Nuclear Workers' Council

Our Council was formed in 1993 as an association of Unions representing Workers across Canada's nuclear industry.

Membership encompasses uranium mines and mills, nuclear fuel production, nuclear power plant (NPP) operation and maintenance, engineering, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning.

Includes Unions at CNL's CRL Site

Canadian Nuclear Workers' Council

The goals of the Council are to:

- ensure the perspectives of Canada's Nuclear Workers are heard by decision makers,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's Nuclear Industries,
- enhance public knowledge about the benefits of Canada's Nuclear Industry, and
- share our experiences with each other.

More information about the CNWC can be found at

www.cnwc-cctn.ca

Our Priority

CANADIAN NUCLEAR WORKERS' COUNCIL

For all CNWC Member Unions the H&S of Members is paramount.

The protection of Workers, the Public and the Environment are interrelated.

Our Members are highly skilled nuclear professionals.

They work, live and play near Chalk River with their families and friends.

Nothing is more important.

Often talk about this at public hearings/meetings

The Near Surface Disposal Facility

- Started following the progress of the NSDF project early.
- On June 17, 2018 the CNWC, United Steel Workers (USW), Professional Institute of the Public Service of Canada (PIPSC) and Power Workers' Union (PWU) met with representatives from CNL to review the project and tour the proposed site.
- Questions and concerns were addressed to our satisfaction.
- Participated in both CNL & CNSC webinars on the NSDF, reviewed information found on CNL's website including CNL's application for a licence amendment, the 2021 Final Environmental Impact Statement (EIS) and supporting documentation.
- Consulted with experts outside of CNL including Dr. Ivanco.
- Observed the Part 1 public hearing and reviewed the Commission Member Documents (CMD) for that hearing, Including the Environmental Assessment (EA) on the NSDF contained in CMD 22-H7.

Expert evaluation

- Dr. Michael Ivanco was asked to review the proposed NSDF project and provide a report to support our submission.
- Dr. Ivanco is the Past President of the Society of Professional Engineers and Associates (SPEA) and continues to represent SPEA on the CNWC Board.
- Worked with AECL at CRL from 1984 to 1997 where he had daily interaction with the professionals working in the Waste Management Division.
- Moved to the engineering division in Mississauga, Ontario where he worked until 2015.
- Sessional lecturer at the University of Toronto.
- A draft of his report was shared with CNWC Member Unions at CRL.
- His report forms the foundation of this submission.

The Problem

- The Chalk River site contains a lot of legacy nuclear material as a result of almost 80 years of operation.
- None of it is in waste disposal sites
- All of it is in temporary storage
- The Near Surface Disposal Facility (NSDF) is the first provision to deal with disposal of waste that is in temporary storage at the site.
- The largest amount of legacy nuclear material, by volume and mass, is low level waste.
- The vast majority of low level waste is not radioactive but consists of benign material with trace contaminants.

The Proposed Solution – The NSDF 1

- The CNWC is of the opinion that an Engineered disposal facility, such as the NSDF, is far superior to the status quo, which is temporary storage. We believe that this is a statement that all interveners would agree with.
- If we accept the previous statement then the remaining questions are: where the facility should be located? and

  what level of containment is sufficient for public safety?
- With respect to location, a compelling case was made that the disposal facility should be on the Chalk River site and a compelling case was also made that the Perch Lake basin watershed was the best location on the site.

The Proposed Solution – The NSDF

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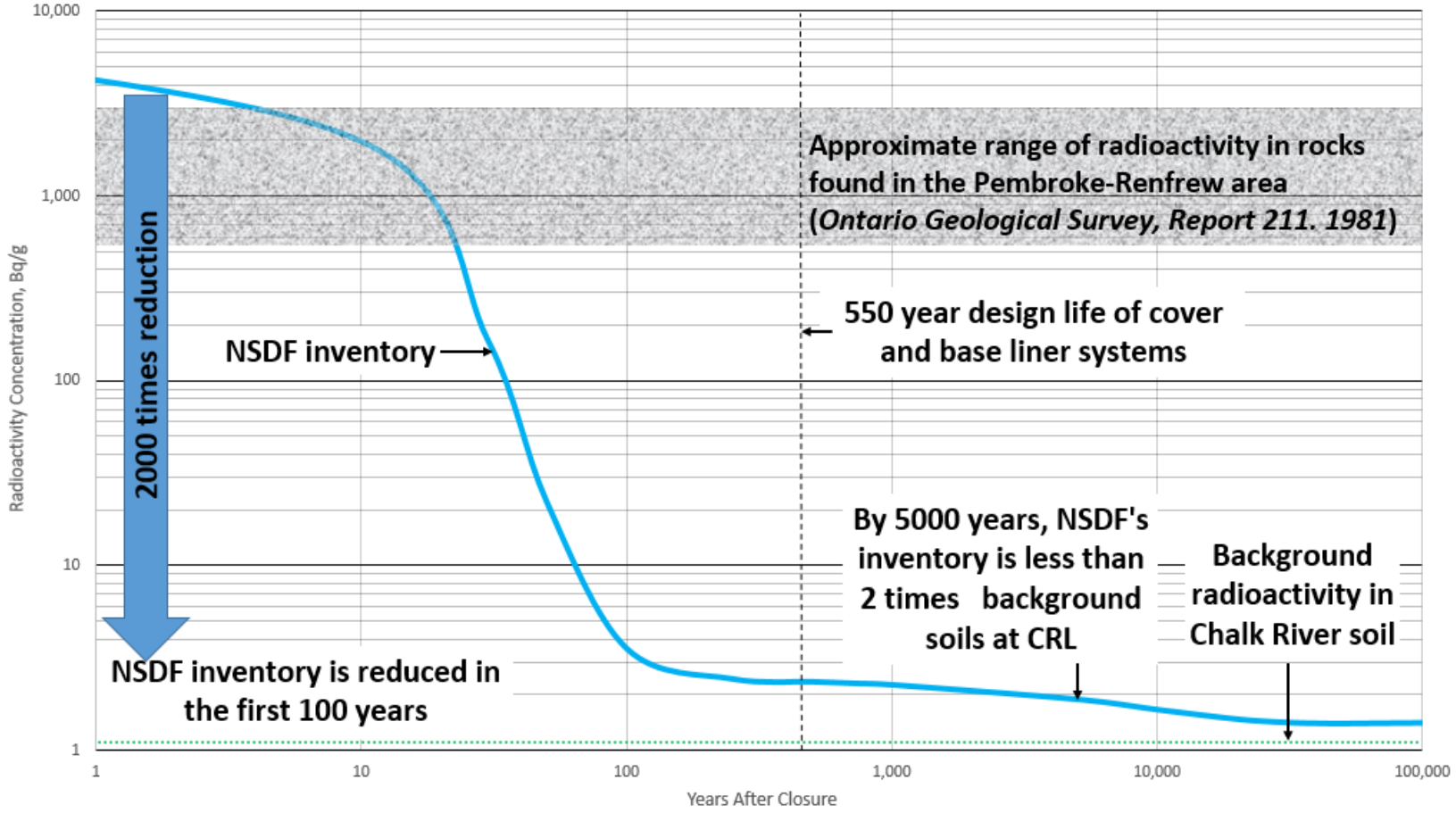

Within 100 years the NSDF inventory is 3 times the natural background of soils at CRL

The Proposed Solution – The NSDF 3

- We do not suggest that low levels of radiation are harmless but make the point in our written submission that:

1. We live in a naturally radioactive environment, and
2. There are places in the world where natural background radiation is much higher than radiation connected with the NSDF and no harm has been associated with those levels of radiation

- The barriers between the NSDF inventory and the food chain are based on natural barriers that have been shown to be effective for containment of radioactive material on time scales far beyond any potential hazard associated with the NSDF

Conclusion

- The NSDF, an engineered disposal facility for low-level waste, is a huge improvement over the status quo.
- The NSDF is not a unique facility with “first of a kind” risks. There are two other low-level waste disposal facilities in Ontario, one in Port Granby and another in Port Hope. There are seven such facilities in the United States, five in operation, one under construction and one that has been capped and closed.
- For these and other reasons stated in our written submission we believe that the NSDF proposed for the Chalk River site of Atomic Energy of Canada will be a safe depository for low level waste.

Closing

- The CNWC fully supports CNL's application.
- We have a shared responsibility to safely dispose of the radioactive waste and not leave it for future generations.
- The NSDF provides a safe and responsible solution and addresses *environmental* concerns.
- The NSDF is protective of the environment, the Ottawa River and human health.
- We recommend that the Commission determine that the NSDF Project is not likely to cause significant adverse environmental effects and approve CNL's application to construct the NSDF.

Once again I would like to thank Members of the Commission, CNSC Staff and all Intervenors. This public process and strong regulatory oversight all serve to protect the environment and maintain the high level of health and safety in our workplaces and our communities.