



Oral presentation

Written submission from Atomic Energy of Canada Limited

In the Matter of the

Canadian Nuclear Laboratories (CNL)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Commission Public Hearing Part 2

May and June 2022

Exposé oral

Mémoire d' Énergie atomique du Canada limitée

À l'égard des

Laboratoires Nucléaires Canadiens (LNC)

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

Audience publique de la Commission Partie 2

Mai et juin 2022



AECL
Atomic Energy
of Canada Limited

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Énergie atomique
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2022 April 11

Record Number: DWM-1191345624-7985

CNSC Commission Registrar
Canadian Nuclear Safety Commission (CNSC)
280 Slater Street
Ottawa, ON
K1A 5S9

Re: AECL Request to Intervene in Commission Public Hearing for the Application by Canadian Nuclear Laboratories (CNL) to Amend its Chalk River Laboratories Site Licence to Authorize the Construction of a Near Surface Disposal Facility

Dear CNSC Commission Registrar,

I am reaching out as the President and Chief Executive Officer of Atomic Energy of Canada Limited (AECL) to request intervenor status for AECL at the upcoming hearing, commencing May 31, 2022, regarding the application by Canadian Nuclear Laboratories (CNL) to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility. As owner of the site and the proposed new facility, AECL has valuable perspectives to bring to the attention of the Commission and wishes to intervene by way of this written submission and an oral presentation / slide deck at the upcoming Commission Hearings. AECL has not received participant funding to present a submission to the Commission.

AECL is a federal Crown corporation with a mandate to enable nuclear science and technology and to protect the environment by fulfilling the Government of Canada's radioactive waste and decommissioning responsibilities. AECL owns the sites and all assets and liabilities carried out under this mandate. Our sites are operated under a Government-owned Contractor-operated (GoCo) model, whereby our contractor, CNL, operates our sites, holds any necessary licences and is the licensee under the Nuclear Safety and Control Act. AECL provides all the necessary funding to CNL in order to carry out these activities for the Government of Canada.

CNL's proposed new facility addresses AECL radioactive waste liabilities. Roughly 95% of the radioactive waste to be emplaced in the proposed near surface disposal facility is AECL-owned waste produced as a result of decades of nuclear science and technology for the benefit of Canadians, with the remaining 5% coming from other Canadian producers, such as hospitals and universities.

Under the GoCo contract arrangement, AECL set the objective for CNL to accelerate the development of a preferred site for low-level waste disposal as well as to present options and a recommendation to AECL for a preferred disposal method that best addresses the needs for low-level waste streams, particularly at Chalk River Laboratories. The expectation set by AECL acknowledged that, following AECL's acceptance of CNL's recommendation, that CNL would present the proposal to the regulatory authority, the Canadian Nuclear Safety Commission, for initiation of the licensing amendment process. As the site owner responsible for the

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oversight of the GoCo contract, AECL reviewed and accepted CNL's recommendation to construct and operate a near surface disposal facility at Chalk River Laboratories and agreed to fund further development of the proposal, including studies and analysis to support the application before the Commission.

AECL fully supports this proposal, subject to the Commission being satisfied that the proposal meets all regulatory, safety and environmental protection requirements. This proposed project would facilitate the disposal of the majority of AECL's low-level waste currently in interim storage, as well as that generated from building decommissioning, land and soil remediation, and ongoing research at the Chalk River Laboratories. AECL and CNL are committed to remediating the Chalk River site and to managing the low-level waste now, rather than leaving it to future generations. The proposed near surface disposal facility is a critical component of AECL's commitment to environmental stewardship and our radioactive waste mandate.

As owner of the Chalk River Laboratories site and ultimately, if approved, owner of the proposed near surface disposal facility, AECL remains responsible for the liabilities for all phases of these endeavours, including construction, operations, closure and post-closure. The full life-cycle of AECL's liabilities are accounted for and backed up by financial guarantee provided by the Government of Canada.

An important aspect of the upcoming public hearing process will be Indigenous engagement. AECL is committed to engaging with Indigenous nations and communities in an open and collaborative way to work towards mutual understanding and opportunities for mutual benefit, and to enable healing and reconciliation. We are committed to establishing lasting relationships with Indigenous peoples aligned with the principles of the United Nations Declaration, and are working closely with Indigenous communities in their territory where AECL sites are located, including the Chalk River site.

Should the Commission agree to grant AECL oral intervenor status, AECL would kindly request that the Commission give due consideration to our unique role in this process as the federal government's Crown corporation, site and waste owner, and would, therefore, request consideration of scheduling our oral presentation earlier in the hearing program.

Yours truly,

4/11/2022

X 

Fred Dermarkar

Signed by: Fred Dermarkar

Fred Dermarkar
President & CEO
Atomic Energy of Canada Limited