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Written submission from the Canadian Nuclear Association

Mémoire de l'Association nucléaire canadienne

Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2021

Rapport de surveillance réglementaire pour les sites des Laboratoires Nucléaires Canadiens : 2021

Commission Meeting

Réunion de la Commission

November 2, 2022

Le 2 novembre 2022





September 29, 2022

Canadian Nuclear Safety Commission c/o Louise Levert, Registrar 280 Slater St. PO Box 1046 Ottawa, Ontario K1P 5S9

Subject: Canadian Nuclear Association Intervention on the 2021 Regulatory Oversight Report for Canadian Nuclear Laboratories Sites.

The Canadian Nuclear Association (CNA) has approximately one hundred members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. As such, our members have a strong interest in all applications of nuclear technology including nuclear laboratory sites.

CNL is Canada's premier nuclear science organization and a world leader in developing nuclear technology for peaceful purposes. CNL's strategic priorities include protecting and restoring Canada's environment, working with nuclear operators and generators to provide clean energy, and contributing to the health of Canadians through medical isotope research.

The CNA has reviewed CNSC Staff's Regulatory Oversight Report (ROR) for Canadian Nuclear Laboratories for 2021 and are in agreement with staff's conclusions that CNL continued to demonstrate solid operating performance and an ongoing commitment to safety and the protection of the environment throughout 2021.

The CNA would like to take this opportunity to highlight several key considerations from 2021 operations:

- CNL demonstrated that it continues to provide ample provisions for the health, safety, and security of workers, the public and the environment. CNSC staff confirmed that conventional health and safety and environmental programs were effective. In addition, radiation protection measures were effective and radiation doses were kept as low as reasonably achievable (ALARA) at all CNL sites.
- In 2021, as part of their commitment to environmental stewardship and sustainability, CNL continued to remove and safely store low level radioactive waste from old, decontaminated buildings and sites.



CNL demonstrated its strongly held belief that Indigenous reconciliation through engagement
and partnership is a fundamental priority. Throughout 2021, CNL continued to ensure that
Indigenous rights and interests are respected including the integration of traditional knowledge
and comprehensive engagement on CNL operations.

In conclusion, the CNA supports CNSC staff's assessment of CNL's 2021 operations. The CNA would also like to take this opportunity to highlight our support for CNSC's Regulatory Oversight Review program. In our view, the CNSC's annual regulatory oversight reports provide an important opportunity to inform and engage the public and Indigenous communities. In addition, The Commission's decision to allow written interventions and to offer public participation funding is a helpful innovation to enable the CNSC focus on issues that matter the most to the public and Indigenous communities.

Thank you for the opportunity to provide our views on the 2021 Regulatory Oversight Report for Canadian Nuclear Laboratory Sites. Should you have any questions or require further information please do not hesitate to contact me.

Sincerely,

Steve Coupland

Director, Regulatory and Environmental Affairs

Canadian Nuclear Association

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