



Oral presentation

Submission from the Bonnechere River Watershed Project

In the Matter of the

Canadian Nuclear Laboratories

Application for the renewal of the Nuclear
Research and Test Establishment Operating
Licence for the Chalk River Laboratories

Commission Public Hearing

January 23-25, 2018

Exposé oral

Mémoire du Bonnechere River Watershed Project

À l'égard des

Les Laboratoires Nucléaires Canadiens

Demande de renouvellement du permis
d'exploitation d'établissement de recherche
et d'essais nucléaires pour les Laboratoires
de Chalk River

Audience publique de la Commission

23-25 janvier 2018



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“Helping Ourselves to a Healthy Environment”

December 11, 2017

Canadian Nuclear Safety Commission (CNSC)

Submitted on-line: <http://nuclearsafety.gc.ca/eng/the-commission/intervention/index.cfm>

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Re: Submission for the January 2018 CNSC hearing on the application from Canadian Nuclear Laboratories (CNL) for the renewal of its nuclear research and test establishment operating licence for the Chalk River Laboratories (CRL) with a proposed expiry date of April 1, 2028 (Ref. 2018-H-01)

The BRWP is a community-based organization established in 1998, incorporated provincially as a not-for-profit organization in 2002 and registered as a Canadian charity in 2006. Our mission is to engage with others to promote awareness and inspire stewardship actions for the Bonnechere River and its watershed and more recently to also build our collective capacity to take stewardship action for other watersheds in Renfrew County. Given that the Bonnechere is a tributary of the Ottawa River, and that the Ottawa River is the source of drinking water for millions of people downstream from Chalk River and Canada's most recently designated Heritage River, we are concerned about proposed changes to the site license for the Chalk River Laboratories (CRL) from an environment, human health, safety, and security perspective.

Given that the CNSC is the sole agency charged with protecting the health and safety of Canadians and the environment, the decision on licence renewal should reflect growing public concern over the long-term management of radioactive and other toxic waste products, including requirements designed to keep dangerous waste materials as far away as possible from the Ottawa River, and to ensure that such wastes are properly segregated, packaged, documented and routinely monitored so that leaks are readily detected and remedial actions can be expeditiously made for centuries to come. Rather than relaxing licensing requirements for CNL, the renewal should be making them more stringent, particularly in light of existing leaking waste management areas and the proposal to establish a Near Surface Disposal Facility and to construct a small modular reactor at the CRL site. Hence, we support **an extension** of the existing licence for no longer than 18 months with all current conditions intact rather than the proposed 10-year licence in which changes are so major and poorly explained and

which lacks a plan to deal with all of the Chalk River wastes. An 18-month extension of the current licence would allow CNL to develop a comprehensive clean-up plan for the Chalk River site and provide experience to assess whether the GoCo (“Government-owned, Contractor-operated”) model of operation has met the Government of Canada’s objective to “reduce risks and discharge Canada’s radioactive waste liabilities faster”. Both matters would be a major topic of discussion at the next hearing. A shorter licence period is particularly in order at the present time given that the crown corporation AECL, as the owner of the site and the waste, and as the agency that has contracted CNL to operate the site and manage the waste, has had some serious ongoing problems with its management structure as identified by the 2017 Auditor General Report. Both CNSC, as the regulator, and the public need to be able to monitor AECL’s ability to maintain control over the consortium.

We also want to express our support for the submission from the Concerned Citizens of Renfrew County and Area, in particular the following recommendations:

- i. The Commission should retain the five current Environmental Protection licence conditions in the new CRL site licence, including a reference to site-wide groundwater monitoring [given the extensive groundwater contamination currently at CRL] and should retain related compliance verification criteria in the new CRL Handbook (rationale p.21; Recommendation #17 p.41)
- ii. The Commission require that CNL describe the highest priority decommissioning and waste management risks [to health, safety, security and the environment] at CRL and the process used to determine them, and publicly release this information (rationale p.34; Recommendation #27 p.42).
- iii. The Commission ask Environment and Climate Change Canada to initiate and lead a public panel review of ways to address the environmental liabilities at the Chalk River Laboratories (rationale p.36; Recommendation #30 p.42).
- iv. The Commission should require that CNL and AECL prepare and publicly release a plan that accurately and completely reflects intended decommissioning activities, and their estimated cost, for the CRL site; and that First Nations be consulted on this plan, along with local non-indigenous communities, with the intent that the plan will be approved by the Government of Canada (rationale p.38; Recommendation #32 p.42).

In addition to this written submission, we wish to make an oral presentation at the public hearings to be held in Pembroke Ontario on January 24 and 25.

On behalf of the Board of Directors,



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