



Oral presentation

**Submission from
Maryanne MacDonald**

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 de
Maryanne MacDonald**

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

From: [Maryanne MacDonald](#)
To: [Interventions \(CNSC/CCSN\)](#)
Subject: Re-Licensing of Chalk River Nuclear Labs
Date: December 11, 2017 23:19:19

To: CNSC
re: Licence renewal for CNL at the Chalk River site.
Date: December 11, 2017

I am writing with respect to the changes requested by CNL to the licence held for the running of the Chalk River site. This information about the request for a licence renewal has come to light quite recently, however, I feel compelled to comment.

As a concerned Canadian, living in Ottawa Ontario, I wish to point out that this is a relatively new consortium overseeing the management of the CNL operation. As such they also have an unproven management team that has not had time to understand the systems for which they are responsible and have not had time to gel as a team to become effective. They are still an organization in transition.

In the licence renewal application it is being proposed that large sections of the safety components be deleted, which in my opinion as a retired Safety professional would be a total lack of Due Diligence on behalf of the CNSC. One of the objects of the Commission is to prevent unreasonable risks. There are few areas in our country with as much risk for tremendous irreversible harm to individuals and ecosystems as the effects of a nuclear incident. To eliminate safety controls is to leave the process open to neglect which could lead to disastrous results. The initial cost savings of eliminating any safety measure will be minuscule to the cost of damaging an ecosystem and its people.

The granting of a ten year licence in such a quickly evolving world of science and technology would negate the benefit of new learnings that may come along in the next few years. What is not thought dangerous today and therefore not of grave concern could very well, with new discoveries, indicate a health and safety risk. If CNL is granted a ten year licence it will be too late to adjust and correct for deficiencies that in the intervening years could cause irreparable harm.

Although the ownership of CNL was transferred to a coalition, the liability still remains with AECL and therefore the Government of Canada. In section 4.1.3 of the application they speak of Future Plans of "updating as activities and business needs change at the CRL site." This could mean a myriad of situations and as such a ten year licence gives approval to pursue activities that possibly are not safe for the public or the ecosystems affected by the operation of the site. Oversight through a licence renewal process at two years maximum would be more appropriate in providing assurance of compliance to all rules and regulations, particularly any new legislation of critical learnings related to safety and the environment with respect to nuclear energy and nuclear waste.

The proposal seeks to replace the previous Management System by embarking on a program to significantly revise and improve the Management System suite of documentation sounds great on paper but is a proposal in its infancy and needs to be rolled out through the organization over an extended period of time. By granting a ten year licence there will be no intervention to determine that the Management System as proposed is indeed working. A licence over a two year time span would allow for an in-depth review of whether the new system is working and corrective actions can be taken if not. In the proposal, section 6.1, it states that "CNL has begun the process of expanding the ability and accountability of staff who may execute the design process". This new organization should be considered a start-up, in its infancy, not tested and proven. For this reason alone it is necessary to limit the licence to a maximum of two years.

Although CSA Standards are for the most part the best knowledge of the day this licence renewal application suggests they would be used to replace the licence conditions currently in place. Standards are not as enforceable as a law or regulation and therefore should not be the final deciding authoritative means to judge the operation. By keeping the licensing term to a two year maximum CNSC will be acting responsibly and providing due diligence to one of the most significant areas of concern, i.e. operation of a nuclear facility.

Licensing of such a toxic industry should be made more stringent rather than relaxing the requirements, especially in light of the fact that this is now operated by a business model consortium seeking increased profits for the shareholders and their number one priority may not be the safety for the employees and the environment.

Future generations have no say in what is happening today but will have all the responsibility for our legacy. I encourage CNSC to thoroughly consider the licensing request in light of the above concerns and limit the renewal timeframe to a maximum of two years.

Respectfully submitted

Maryanne MacDonald