

MEMORANDUM

NOTE DE SERVICE

To Candace Salmon
A Commission Registrar, CNSC

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2026-07-16

From X Karen Owen-Whitred
De Karen Owen-Whitred
Director General, Directorate of Nuclear Cycle...
Signed by: OwenWhitred, Karen

Subject CNSC Staff's Review of Canadian Nuclear Laboratories' Request for Confidentiality in Relation to
Objet the Whiteshell Laboratories Licence Renewal Application / Examen par le personnel de la CCSN
de la demande de confidentialité des Laboratoires Nucléaires Canadiens concernant la demande
de renouvellement du permis des Laboratoires de Whiteshell

PURPOSE/OBJECTIF

The purpose of this memorandum is to provide Canadian Nuclear Safety Commission (CNSC) staff's comments to the Commission regarding the matter of Canadian Nuclear Laboratories' (CNL) request to protect from public disclosure the documents submitted in the request for confidentiality:

[Request for Confidentiality of Material Submitted in Relation to the WL 2027 Licence Renewal Application](#)

The CNSC Registry subsequently requested that CNSC staff provide their advice to the Commission on the Matter.

DISCUSSION

To CNSC staff's knowledge, CNL's documents provided in the confidentiality request have not been made publicly available elsewhere. The documents listed in this request have consistently been treated as confidential in CNSC staff's dealings with CNL.

CNSC staff reviewed the list of documents and related details provided by CNL against Rule 12 of the [CNSC Rules of Procedure](#). This information, along with CNSC staff comments, are included in Table 1 attached to this memorandum. CNL has requested that 2 of the 9 documents have the entire contents be kept confidential and has provided public summaries. For the remaining 7 documents, CNL has requested specific content be redacted. CNSC staff find the public summaries and redacted documents provided by CNL to be acceptable, as they accurately represent the content found in the full versions of the documents.



While the documents identified in the confidentiality request are not publicly available in their entirety, CNSC staff wishes to inform the Commission that CNL requested the redaction of building numbers in certain documents listed in Table 1 to reduce the risk of disclosing locations of sensitive materials or operations. However, CNSC staff has identified several publicly available documents, including past Commission Member Documents from both CNSC staff and CNL, that already disclose building numbers.

This information was released publicly before the current [Directive on Requesting Confidentiality](#) came into effect on September 15, 2025, which outlines how participants in Commission hearings can submit a request under Rule 12 of the [CNSC Rules of Procedure](#) for information to be kept confidential, including Indigenous Knowledge. CNSC staff anticipate that the recently formalized confidentiality request process will mitigate this issue going forward. CNSC staff are of the view that the information currently available to the public presents a low risk. Nevertheless, CNSC staff support CNL's request to redact building numbers in accordance with the confidentiality request.

CONCLUSION

CNSC staff have reviewed CNL's requests for confidentiality and as requested, provided comments on the proposed confidentiality requests in Table 1. It is CNSC staff's recommendation that CNL's request be accepted by the Commission.

Prepared by: Benjamin Nguyen, Senior Project Officer (CNSC)

Attachment: Table 1

Contact/Personne-ressource: Benjamin Nguyen, 343-549-2587
Canadian Nuclear Safety Commission

Table 1: Material subject to the request for confidentiality

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
1.	Licensing Basis List for Whiteshell Laboratories	☐ Entire content ☒ Redacted content as clearly identified in the document	☐ The information involves national or nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☒ Other (specify), and ☒ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	Building numbers have been redacted to minimize the risk of unintended disclosure of locations of sensitive material or operations. While seemingly low risk on their own, such identifiers can be combined with other information and removing this data ensures we uphold our obligation to safeguard sensitive material.	CNSC staff are not aware of this specific document being available elsewhere publicly. However, some of the redacted information can be found in other documents available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.
2.	Administrative Levels and Action	☐ Entire content	☐ The information involves national or	Building numbers have been redacted to minimize the risk	CNSC staff are not aware of this specific document being

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	Levels for WL Air and Liquid Radioactive Effluent	ü Redacted content as clearly identified in the document.	nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ü Other (specify), and ü Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	of unintended disclosure of locations of sensitive material or operations. While seemingly low risk on their own, such identifiers can be combined with other information and removing this data ensures we uphold our obligation to safeguard sensitive material.	available elsewhere publicly. However, some of the redacted information can be found in other documents available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.
3.	Canadian Nuclear Laboratories Management System Manual	ü Entire content ☐ Redacted content as clearly identified in the document	☐ The information involves national or nuclear security elements	The complete document is not intended for distribution. Summary: The CNL Management System Manual (Manual) sets the framework of policies,	CNSC staff are not aware of this information being publicly available elsewhere. This information has consistently been treated as



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			☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☐ Other (specify), and ☐ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	processes, and practices used to ensure that CNL can fulfill its mission and achieve its objectives. The Manual describes the relevant statutory, regulatory, contractual, culture, and corporate frameworks within which CNL exists and operates. CNL's Management System is based on and complies to the requirements of CSA N286-12, ISO 9001:2015 and ISO 14001:2015.	confidential in CNSC's interactions with CNL. It is noted that the document explicitly states an intellectual property notice: <i>"Intellectual Property NOTICE: The attached documents/files/information includes information owned/developed by CNL which has particular value to CNL's business interests (CNL IP). Access is restricted to authorized persons for authorized purposes only. Third party disclosure or use of CNL IP requires a licence or nondisclosure agreement, depending on the nature of the information, failing which such disclosure or use is strictly prohibited."</i> CNSC staff find that CNL's provided rationale and public summary is acceptable. CNL's public summary accurately

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					represents the content found in the full version of the document.
4.	Whiteshell Laboratories Annual Compliance Monitoring Report for 2025	☐ Entire content ☒ Redacted content as clearly identified in the document	☒ The information involves national or nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☒ Other (specify), and ☒ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	Figure 12 was redacted to remove the labelling on specific structures associated with the waste management area, such identifiers can be combined with other information to reveal locations of sensitive material. Removing this data ensures we uphold our obligation to safeguard sensitive material.	CNSC staff are not aware of this specific document being available elsewhere publicly. However, some of the redacted information can be found in other documents available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.



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5.	Designated Representatives of the Licensee, Site Licences, Certificates & Permits	☐ Entire content ü Redacted content as clearly identified in the document	☐ The information involves national or nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ü Personal, or ü Other (specify), and ü Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	Building numbers have been redacted to minimize the risk of unintended disclosure of locations of sensitive material or operations. While seemingly low risk on their own, such identifiers can be combined with other information and removing this data ensures we uphold our obligation to safeguard sensitive material. Names were redacted from the document to protect personal information and maintain individual privacy.	CNSC staff are not aware of this specific document being available elsewhere publicly. However, some of the redacted information can be found in other documents available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.
6.	WL Detailed Decommissioning Plan,	☐ Entire content ü Redacted content as clearly identified	☐ The information involves national or	Building numbers have been redacted to minimize the risk of unintended disclosure of	CNSC staff are not aware of this specific document being available elsewhere publicly.

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	Volume 1 – Program Overview	in the document	nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☐ Other (specify), and ☐ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	locations of sensitive material or operations. While seemingly low risk on their own, such identifiers can be combined with other information and removing this data ensures we uphold our obligation to safeguard sensitive material.	However, some of the redacted information can be found in other documents available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.
7.	WL Effluent Verification Monitoring Plan	☐ Entire content ☐ Redacted content as clearly identified in the document	☐ The information involves national or nuclear security elements	Building numbers have been redacted to minimize the risk of unintended disclosure of locations of sensitive material or operations. While seemingly low risk on their	CNSC staff are not aware of this specific document being available elsewhere publicly. However, some of the redacted information can be found in other documents

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			☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☐ Other (specify), and ☐ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	own, such identifiers can be combined with other information and removing this data ensures we uphold our obligation to safeguard sensitive material. Additionally for this reason, building numbers and detailed names of locations on maps have been redacted. Assessment Tables related to nuclear facilities have also been redacted as the information may be used to deduce quantities of nuclear material. This information could present potential security risks if disclosed.	available publicly, such as past Commission Member Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.
8.	Whiteshell Laboratories Environmental Monitoring Plan	☐ Entire content ☒ Redacted content as clearly identified in the document	☐ The information involves national or nuclear security elements ☒ The information pertains to Indigenous Knowledge The information is:	Building numbers have been redacted to minimize the risk of unintended disclosure of locations of sensitive material or operations. While seemingly low risk on their own, such identifiers can be combined with other	CNSC staff are not aware of this specific document being available elsewhere publicly. However, some of the redacted information can be found in other documents available publicly, such as past Commission Member



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			☐ Financial, ☐ Commercial, ☐ Scientific, ☐ Technical, ☐ Personal, or ☐ Other (specify), and ☐ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	information and removing this data ensures we uphold our obligation to safeguard sensitive material. Additionally for this reason, building numbers and detailed names of locations on maps have been redacted. An Appendix containing information on site specific medicine, berries and other food plants from an Indigenous Nation has also been redacted.	Documents, that disclose building numbers alongside associated facility names and operational details. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's redacted document is acceptable in that it accurately represents the content found in the full version of the document.

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9.	Whiteshell Laboratories Site Emergency Response Plan	☒ Entire content ☐ Redacted content as clearly identified in the document	☒ The information involves national or nuclear security elements ☐ The information pertains to Indigenous Knowledge The information is: ☐ Financial, ☐ Commercial, ☐ Scientific, ☒ Technical, ☐ Personal, or ☐ Other (specify), and ☒ Is consistently treated as confidential and the person affected has not consented to disclosure. Or: ☐ Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	This document contains information related to nuclear facility site layout, infrastructure details, hazard assessments, radiological source terms and accident scenarios that could pose security risks if disclosed. This information if released could compromise the effectiveness of emergency preparedness and response by exposing resource capabilities and responses. The complete document is not intended for distribution. Summary: The Whiteshell Laboratories (WL) Emergency Response Plan was created to support operations at the WL site to prepare for, respond to, and recover from emergency situations that are beyond the day-to-day operations of on-site emergency response services.	CNSC staff are not aware of this information being publicly available elsewhere. This information has consistently been treated as confidential in CNSC's interactions with CNL. CNSC staff find that CNL's rationale and provided public summary is acceptable. CNL's public summary accurately represents the content found in the full version of the document.