



Oral presentation

Submission from Caelhan Wood

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 Caelhan Wood

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

I am opposed to the Canadian Nuclear Laboratories' application for a ten-year license for their operation of the Chalk River site.

There is a risk that one million cubic meters of radioactive waste will contaminate the Ottawa River, which provides drinking water for millions of humans, plants and animals downstream. This contamination would remain for 100 000+ years – this fact alone eclipses any reasons for not handling this situation with the utmost care. It is bad enough that we are planning to make a giant mound of radioactive waste on the side of a hill, next to a swamp, less than one kilometer from a major river.

This is a situation where we have the honour of putting aside our own needs to serve the well-being of the whole. Removing 28 of 56 current licence conditions that are in-place to prevent accidents from happening is not serving the greater-good. Below are a few conditions that would be lost:

- **4.2 New Nuclear Facilities:** The licensee shall only carry out construction and/or operation activities of any new nuclear facility at the CRL site with the prior approval of the Commission.
- **4.4 Nuclear Facilities Undergoing Decommissioning Activities:** The licensee shall only decommission a nuclear facility, or any part thereof, at the CRL site in accordance with documented decommissioning plan(s) and procedures, and with the prior approval of the Commission to proceed with the decommissioning.
- **12.3 Nuclear Legacy Liabilities:** The licensee shall ensure that nuclear legacy liabilities at the CRL site are addressed.

The ones who will have to live with these changes are the public, accordingly the members of the public must have their requests heard and acted upon as soon as possible. A 10-year license term from 2018 to 2028 obviously disregards the opinion of the public. The licence term should be three years at maximum. The next hearing should be in 2021 or sooner.

An undertaking with historic consequences such as this should be closely monitored at every stage to make sure the rules are being followed. As such, all existing reporting requirements from the CNSC should be maintained and enforced. Surely regulatory approval and public notification should be required at every stage of development and for every new facility on site.

Assurance that public involvement be maintained is not supported by the fact that the Atomic Energy of Canada Limited, owner of the Chalk River Laboratories and other federal nuclear facilities, has experienced a “significant deficiency in board renewal”, has “not met its statutory obligation to hold public meetings” since 2009, and lacks “a formal, systematic process for monitoring and reporting on risks” among its facilities.

As a Canadian, I am ashamed that Canada’s nuclear regulator appears to be more interested in supporting the nuclear industry than protecting our health and the environment, which is its primary mandate under the *Nuclear Safety and Control Act*. Please keep our life-giving fresh waters safe from radioactive waste.

Yours sincerely,

Caelhan Wood