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## **Oral presentation**

**Submission from  
David L. Prentice**

In the Matter of the

## **Canadian Nuclear Laboratories**

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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  
David L. Prentice**

À l'égard des

## **Les Laboratoires Nucléaires Canadiens**

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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**



## CNSC and the Chalk River Laboratories License

I am the closest downriver neighbor of Canadian Nuclear Laboratories at Chalk River—about 5km, at the tip of Pointe Malin. I am nearly the same age as its first reactor, and one of my earliest memories is boating up to Deep River and being told by my grandfather to keep my camera under my jacket on the seat because it was forbidden to take photographs. (The old sign is barely readable today.) I thought it was kind of neat that there was something this big and mysterious right near our old family (1920) cabin, a long way from my suburban Connecticut home.



As time went on and Chalk River Nuclear Laboratories, as it was then known, became a more everyday part of our neighborhood, and photos from the River became OK, we all maintained a quiet acceptance of it, meaning we didn't worry about what they were doing there. My friends and I took the public tour in 1971. Even my very late awareness of the 1952 meltdown didn't concern me a lot. These people are on it, they are smart, the government owns it and will keep an eye out: they can handle it.

The only dangers we knew of on our River were the floating logs, and occasionally the deadheads, that had escaped from the huge log booms that we used to see frequently labouring down the Ottawa. When they floated loosely, the logs were easily visible except in rough water; when they became waterlogged and stuck out of the water near-vertically, they were sometimes harder to see, even worse when they hid just at or under the surface. I have been watching one right off my property since the early 1960s. It lurks in an adjacent small bay, silent and invisible, still a threat. And even a log that has sunk to the bottom can come back to haunt our River: over time, decay processes (bacteria and fungi) will reduce the density of a log, eventually causing one end to rise and once again become a deadhead! Even though a danger is hidden, it can be a threat.

Which turns out to be a metaphor for our River these days. But while logs are organic, natural, often visible, and only occasionally dangerous, radioactivity is different. Radioactivity is not organic, though it can be dangerous to organic life. And normally it mostly is natural. It is not visible, and it is not always dangerous. But when it is part of a process going on in the big buildings up the River where you hardly ever see any people, radiation is still invisible but can be *exceedingly* dangerous, more dangerous than anything we will likely ever know.



The problem is, we can't see when there is any radiation danger. We have never needed anyone to tell us the visible logs are dangerous, and most people around here will mark a deadhead that is a threat. But we are helpless with radiation; we can't tell when it is in the air or the water, and none of our neighbours can mark it.

And that is why I and my neighbors and so many others are finding that just about every piece of news from and about the Plant is scary—not the least of which is that Canada no longer runs the place. CRNL became AECL, and now it's CRL, run by private companies, some of which are not even located in this country. I have a Master's in Business Administration, and about the only thing I remember is that corporations strive to make a profit. *Strive*? In fact, they will do *whatever it takes* to make a profit. If they don't, the stock goes down, bonuses and salaries are curtailed, the execs cut the fat, and then they cut some more that really isn't fat, and then they get fired so someone else can come in and cut some more fat that isn't fat at all. And programmes, actions and monitoring, security, safety, and a lot of other babies go out with the bathwater—and quite possibly end up our River.

And unlike the logs, we will have no idea that they are there. We understand logs in the River, but we also know that this is no way to run a nuclear facility. We've seen that in the NSDF. Cheap and fast—it's the wrong technology in a bad location.

And now we are seeing more ominous thinking in the License. A longer term. Less reporting and record-keeping. No requirement for monitoring water on or below the surface. Many of the stipulations in the preceding license have been removed. Why? Why aren't existing wastes throughout the property being cleaned up? There have been rumors for years that there are wastes already dumped in the River. Is this true? If not, has there been a denial? What *don't* we know about? Should we be worried? We think so.

A ten-year license is *completely* unrealistic. The draft license has so many holes in it, it makes absolutely no sense. It is a document that ignores current and past issues, it does not follow solid scientific reasoning, it simply defies logic. It reads like 007's license. Nuclear management is not something that an educated population should entrust to a profit-making organization. *Cheap* and *fast* do not belong in the vocabulary of this endeavor. Past actions got you—all of us—into this mess, so how are we going to get out, get back to something closer to the way the property was before the first hole was dug. I have a photo of the site taken in the 1920s or '30s: it was a lovely piece of land.



Public confidence in the plant, its management, and its government oversight is at what must be an all-time low. Its licensing under *at least* the specifications of the current license is critical to the future of the plant and to the health and safety of everyone down the River, and indeed to every Canadian. Our scientific friends' submissions would ask even more of a license.

A new license should be one aspect of a new international model for how nuclear facilities should be managed, run, cared for, and kept safe. It should *exceed* international standards — and set new

ones. Why shouldn't Canada be as well known for nuclear management as we are for keeping world peace? We should indeed be the *peacekeepers* of the nuclear environment.

I certainly expect that the Canadian Nuclear Safety Commission feels the same way. Keep in mind the CNSC's shopping-bag motto that I discussed in my NSDF submission: ***We will never compromise safety.*** I carry all sorts of stuff around in that bag to remind everyone who sees it. The bag is the most meaningful promotional tchotchke item I have ever seen, and I trust the CNSC to follow that philosophy.



We will watch for the logs, which are still out there. Your job is to ensure that all nuclear hazards are avoided and safety is never compromised, and to remediate the deleterious effects of what has already been done at Chalk River.

Thank you.

A handwritten signature in black ink that reads "David L. Prentice". The signature is written in a cursive style.

David L. Prentice

Monday, December 11, 2017

Note: I will plan to make an oral presentation in Pembroke in January.