



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

CMD 18-H2.56

File/dossier: 6.01.07

Date: 2017-12-06

Edocs: 5414158

**Written submission from
Robert Farley**

**Mémoire de
Robert Farley**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories

Les Laboratoires Nucléaires Canadiens

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

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

Commission Public Hearing

Audience publique de la Commission

January 23-25, 2018

23-25 janvier 2018

From: Robert Farley
Sent: December-06-17 6:22 PM Interventions
To: (CNSC/CCSN)
Subject: Abrogate present proposed system

Here are a few ideas to keep in mind, prior to rendering a decision on radioactive and toxic material storage.

- 1) A 10-year licence is unwise as there are very big changes being planned at the Chalk River site. The consortium has been operating at Chalk River for only three years and should be kept on a short lease to ensure that the public and the regulator have ample opportunity to nip problems in the bud as CNL embarks on an entirely novel set of activities. A 2 or 3 year licence at most should be granted.
- 2) CNSC is the sole agency charged with protecting the health and safety of Canadians and the environment; as such it should not be relaxing licensing requirements but making them more stringent. All existing reporting requirements should be maintained and strictly enforced, and explicit permission should be required for each and every new facility on site, with regulatory approval and public notification required at every stage of development.
- 3) To enable future generations to deal with radioactive and toxic materials at the Chalk River site, as well as those being brought it from elsewhere, new licence requirements should be added to require that all waste materials be properly segregated, labelled, and packaged with a complete inventory of the contents of each package. Mixing diverse toxic materials together will make it extremely difficult for future generations to properly characterize the waste; and, in the case of failure of containment, to take appropriate corrective action.
- 4) 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; the regulator and the public need to be able to monitor AECL's ability to maintain control over the consortium. A shorter licence period is in order to allow for timely review of such.
- 5) The licence should reflect growing public concern over the long-term management of radioactive and other toxic waste products, including a set of requirements designed to keep dangerous waste materials as far away as possible from the Ottawa River, and to ensure that such wastes are packaged and routinely monitored so that leaks are readily detected and repairs can be expeditiously made for centuries to come.

These are a few proposed ideas to protect the environment and residents. These recommendations need to be approved and actioned, if we are going to move forward as a society.

Robert Farley