



File / dossier : 6.01.07

Date: 2017-12-06

Edocs: 5413782

Oral presentation

**Submission from
Kim Y. Hanewich**

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
Kim Y. Hanewich**

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: [Kim Hanewich](#)
To: [Interventions \(CNSC/CCSN\)](#)
Subject: letter of concern from Kim Hanewich
Date: 6 décembre 2017 08:57:37

To the Canadian Nuclear Safety Commission (CNSC)

I'd like to voice my concerns about the 2018 relicensing of Chalk River Laboratories (CRL) for 10 years (until 2028). I don't want my tax money going to support the private consortium that operates the Chalk River labs and manages the radioactive and other toxic wastes. To my mind it is unacceptable and irresponsible to encourage any future pollution of this area by either toxic or radioactive wastes. Rather the focus of tax dollars should be to clean up the already polluted site!

Some of my other concerns are:

(1) CNL wants to build a huge 5 to 7 story mound of radioactive and other toxic wastes (including things like asbestos, heavy metals, DDT and many toxic chemicals associated with reprocessing and isotope production) less than a kilometre from the Ottawa River. Originally it was going to include everything except irradiated nuclear fuel (the high-level radioactive waste). CNL planned to include all low-level and intermediate-level waste in the mound, including materials that would require shielding to protect the workers and including very long-lived materials that would remain dangerous for hundreds of thousands of years. Because of the outcry from the public — mostly from the Quebec side of the border — including a number of town council resolutions against the project and a good critique from the Government of Quebec — CNL has said that it will NOT put intermediate level waste in the mound, but will leave it where it is on site. However the site is still unacceptable as a permanent facility, ultimately to be abandoned.

(2) CNL also plans to demolish about a hundred buildings at Chalk River, many of them contaminated. It also plans to bring radioactive and toxic waste to Chalk River from the Whiteshell Nuclear Research Establishment in Pinawa, Manitoba, and from four federally-owned nuclear reactors: the NPD (Nuclear Power Demonstration plant) on the Ottawa River, the WR-1 reactor at Whiteshell on the Winnipeg River, the Douglas Point reactor at Kincardine on Lake Huron, and the Gentilly-1 reactor on the St-Lawrence River. High level waste and intermediate level waste will also be brought to Chalk River from these locations, but will not be put in the mound. Meanwhile, however, the NPD reactor and the WR-1 reactor will be decommissioned by simply being “entombed” on-site, right beside their respective rivers, by dumping all the intensely radioactive debris into the sub-basement of the reactor building and filling the entire below-surface radioactive structure with special (as yet t

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 in 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.

Thank you for your time and attention.

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