



NUCLEAR WASTE MANAGEMENT ORGANIZATION SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

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**MR. BRIAN TORRIE**

Director General, Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
P.O. Box 1046, Station B  
280 Slater Street  
Ottawa, Ontario  
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Dear Mr. Torrie:

**NWMO Comments on CNSC REGDOC-2.13.1, Safeguards and Nuclear Material Accountancy**

The purpose of this letter is to provide NWMO comments on CNSC's draft REGDOC-2.13.1, Safeguards and Nuclear Material Accountancy.

NWMO is mainly concerned with how this REGDOC applies to a deep geological repository (DGR) for used nuclear fuel. It is unclear whether a repository would be considered a "separate nuclear material storage installation" as listed in Section 3.1.

A DGR for used nuclear fuel has unique aspects that need to be considered from a safeguards perspective given that the facility is designed to contain and isolate the used fuel in the long term. It will be necessary to ensure that safeguards features or processes do not have unintended consequences on safety in the long term.

NWMO believes that safeguards for a repository need to be further considered in the following areas:

- Use of safeguards equipment, seals and engravings on components of the repository's engineered barrier system;
- Process capable of handling high throughput;
- Inventory tracking and inspections once material is placed underground; and
- Timeframes for record keeping

NWMO appreciates the opportunity to comment on draft REGDOC-2.13.1. If you have any questions regarding this submission, please contact me at (647) 259-3025.

Sincerely,

Paul Gierszewski  
Director, Safety & Licensing

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