



**Written submission from
Concerned Citizens of Manitoba**

**Mémoire des
Concerned Citizens of Manitoba**

In the Matter of

À l'égard de

Whiteshell Laboratories

Laboratoires de Whiteshell

Request by CNL to renew the Whiteshell Laboratories Decommissioning Licence for a one-year period to December 31, 2019, with the same terms and conditions as the current licence.

Demande des LNC concernant le renouvellement du permis de déclasserment des Laboratoires de Whiteshell pour une période d'un an, jusqu'au 31 décembre 2019, avec les mêmes modalités et conditions que le permis actuel

Public Hearing - Hearing in writing based on written submissions

Audience Publique - Audience fondée sur des mémoires

June 2018

juin 2018

May 24, 2018

Concerned Citizens of Manitoba object strongly to provisions of the contract for the Canadian National Energy Alliance. We also feel that their extension of the WNRE license based upon further work on the in-situ entombing for the WR1 reactor has been established upon a faulty plan. We encourage the CNSC to place the responsibility for the site with the government of Canada and to establish a long-term plan for decommissioning that is based upon sound research that isolates these dangerous radioisotopes from the environment.

The CNEA, who are operating in Canada under the name "Canadian Nuclear Laboratories," do not have the integrity to be operating the facility at Pinawa. According to a variety of sources this consortium includes SNC-Lavalin which has been barred from bidding on any projects financed by the World Bank for ten years because of admitted fraudulent activities, and will be facing criminal charges for bribery and fraud later this year in Canada in relation to the building of a Montreal hospital. CH2M, another consortium member, was convicted on criminal charges of fraud in the USA in connection with mishandling of the Hanford radioactive waste cleanup. Some top officials of CNL were involved in a multibillion euro contract for radioactive cleanup at Sellafield, Northern England, that was cancelled amidst a public and parliamentary scandal over gross mismanagement in the UK.

The untested and ill-conceived in-situ plan for the WR1 reactor is contrary to the 2014 IAEA General Safety Requirements, Part 6, *Decommissioning of Facilities*, which state:

Entombment, in which all or part of the facility is encased in a structurally long lived material, is not considered a decommissioning strategy and is not an option in the case of planned permanent shutdown. It may be considered a solution only under exceptional circumstances (e.g. following a severe accident). (1)

In addition a 2009 IAEA report stated that

"CNSC should improve its regulatory framework including regulatory documents and guides with respect to radioactive waste management to ensure that radioactive waste is managed in a consistent manner."(2)

These IAEA reports make it clear that CNSC approvals should not be done on an ad hoc basis and that in-situ solutions are not acceptable. We urge proper diligence and oversight of this facility and the ever-changing plans of the contractors who operate it.

Decisions have also been made regarding abandoning barrels of low level radioactive waste in unlined trenches. The January 2017 CNL Integrated Waste Strategy states that CNL will leave 21 of the 25 trenches in-situ. This is not consistent with sound decommissioning practises and will not return the environment to a natural state as promised in the original AECL plan. A full report on the status of these trenches and the radioactivity that is leaking out of them needs to be made public.

It is clear that the contracting consortium have only economic and not public health priorities in their attempt to trim 125 million from the decommissioning plans.

Dave Taylor,
Spokesperson for Concerned Citizens of Manitoba.

(1) IAEA 2014. Decommissioning of Facilities. International Atomic Energy Agency. General Safety Requirements. No. GSR Part 6. <https://www-pub.iaea.org/MTCD/publications/PDF/Pub1652web-83896570.pdf>

(2) IAEA 2009a. Integrated Regulatory Review Service (IRRS) TO Canada. Ottawa, Canada. 31 May to 12 June 2009. International Atomic Energy Agency. IAEA-NS-IRRS-2009/02. https://www.iaea.org/sites/default/files/documents/review-missions/irrs_mission_to_canada_may-jun_2009.pdf.