



Oral presentation

Exposé oral

**Written submission from
Atomic Energy of Canada Limited**

**Mémoire d'Énergie atomique
du Canada limitée**

In the Matter of the

À l'égard de

Canadian Nuclear Laboratories

Laboratoires Nucléaires Canadiens

Application to renew its waste nuclear
substance licence for the Port Hope Project

Demande concernant le renouvellement du
permis de déchets de substances nucléaires
pour le projet de Port Hope

Commission Public Hearing

Audience publique de la Commission

November 22, 2022

22 novembre 2022



AECL
Atomic Energy
of Canada Limited

EACL
Énergie atomique
du Canada limitée



2022 October 14

Canadian Nuclear Safety Commission (interventions@cnscccsn.gc.ca)
280 Slater Street
PO. Box 1046, Station B
Ottawa,
ON K1P 5S9

Re: Intervention on Canadian Nuclear Laboratories Limited's (CNL) Application to renew its waste nuclear substance licence for the Port Hope Project

Dear CNSC Commission Registrar,

I am reaching out as the President and Chief Executive Officer of Atomic Energy of Canada Limited (AECL) to request intervenor status for AECL at the upcoming hearing on November 22, 2022, regarding the application by Canadian Nuclear Laboratories (CNL) for the renewal of the Port Hope waste project licence. AECL has valuable perspectives to bring to the attention of the Commission and wishes to intervene by way of this written submission and an oral presentation / slide deck at the upcoming Commission Hearings. AECL has not received participant funding to present a submission to the Commission.

To begin, AECL would like to commend CNL on the safe emplacement of over 2.7million tonnes of low level radioactive waste. The majority of this waste was previously emplaced at the Port Granby site and the Welcome Waste facility near Port Hope. In addition, CNL has completed the remediation of the Port Granby Site and closed and capped the Long Term Waste Management Facility (LTWMF) there, remediated all the temporary LLRW storage sites in Port Hope, remediated a number of major sites (i.e., Mill St, Water Works East, Pine Street Consolidation site), started remediating the harbour basin, nearing completion of the remediation of the viaducts, started remediation of the industrial sites and have began the remediation of the small scale sites. AECL would also like to recognize the staff of the Canadian Nuclear Safety Commission (CNSC) for their ongoing oversight of CNL in the advancement of this complicated community-driven remediation program.

CNL has, however, encountered significant challenges in the remediation and close-out of the small scale sites project (SSS). One of the notable issues is the challenge to remediate non-radioactive contaminants to background levels. The initial submission for the proposal to change the clean-up criteria was issued in early 2020. AECL recognizes the challenges in modifying this criteria but strongly urge all parties to expedite this proposal to a workable conclusion which is supportive of protecting human health and the environment with minimal disruption to the residents of Port Hope.

As requested above, AECL believes that we have valuable perspectives to bring to this public hearing process and would like to present to the Commission on November, 22, 2022, on the following topics:

- ongoing relationships with local stakeholders, the municipality and Indigenous nations;
- outline the basis of the legal agreement and the intent of the mediated settlement;

Atomic Energy of Canada Limited

286 Plant Rd
Chalk River, Ontario
Canada K0J 1J0
Telephone: 613-589-2085

Énergie atomique du Canada limitée

286 rue Plant
Chalk River (Ontario)
Canada K0J 1J0
Téléphone: 613-589-2085

- comment on the inclusion of the special circumstances document in the licence conditions handbook;
- outline the potential for extension of the use of the special circumstances protocol;
- expand on the challenges encountered remediating the non-radiological contaminants;
- highlight the advantages to the environment and the community by modifying the clean-up criteria and
- highlight the long term impact to the town and its residents should a workable solution not be established.

Should the Commission agree to grant AECL oral intervenor status, AECL would kindly request that the Commission give due consideration to our unique role in this process as the federal government's Crown corporation, and waste owner for the Port Hope area projects, and would, therefore, request consideration of scheduling our oral presentation earlier in the hearing program.

Yours truly,

10/14/2022

X 

Signed by: Fred Dermarkar

Fred Dermarkar
President & CEO
Atomic Energy of Canada Limited (AECL)