



## **Supplementary Information**

### **Presentation from Gillian Walker**

In the Matter of the

#### **Canadian Nuclear Laboratories (CNL)**

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Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

#### **Commission Public Hearing Part 2**

**May 30 to June 3, 2022**

## **Renseignements supplémentaires**

### **Présentation de Gillian Walker**

À l'égard des

#### **Laboratoires Nucléaires Canadiens (LNC)**

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Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

#### **Audience publique de la Commission Partie 2**

**30 mai au 3 juin 2022**

# PRESENTATION TO CNSC BY GILLIAN WALKER

JUNE 1, 2022

CNL Application to Amend Chalk River Site Licence for  
Construction of a Near Surface Disposal Facility

# Summary

2

- Proposed NSDF construction raises serious environmental concerns.
- Fails to consider other physical activities associated with the project as per section 19(1)(a) of CEAA 2012.
- Omission of waste consolidation and waste management activities renders EA incomplete.
- Licence approval would be unreasonable.

# “Other physical activities”

3

- Section 19(1)(a) of CEAA 2012 requires Environmental Assessment to take into account:
  - (a) “...any cumulative environmental effects that are likely to result from the designated project in combination with other physical activities that have been or will be carried out.”
- But EA has no details on classification, characterization and activities related to off-site wastes.
- EA does not assess their environmental effects.

# Waste Consolidation

4

- EA states purpose of NSDF: permanent disposal of current/future waste at Chalk River Laboratories (CRL) and smaller amount of waste from off-site locations
- Safety case states 5% from other Canadian Nuclear Laboratories (CNL)-operated sites
- Another 5% from other sources such as hospitals, govt. agencies, industrial/ commercial sources

# Waste Consolidation

5

- Decommissioning of off-site CNL-operated facilities and consolidation of off-site wastes at Chalk River
- These are physical activities that will be carried out within the NSDF project
- Phase 1: “enable decommissioning and environmental remediation activities at CRL and other CNL sites.”
- Phase 2: accommodate waste generated from future activities at Chalk River and other CNL sites

# CNL's Integrated Waste Strategy

6

- CNL's Integrated Waste Strategy (IWS) outlines strategy for managing waste across CNL-operated facilities and program for decommissioning these facilities
- Construction of the NSDF for disposal of CNL-managed low-level waste (LLW) is listed as one component of the CNL's IWS
- Seven CNL sites require waste management, according to IWS

# Integrated Waste Strategy

7

- Decommissioning planned or underway at CRL, Whiteshell Laboratories, Douglas Point and Gentilly-1
- IWS strategy for LLW from decommissioning:
  - “segregate where practical, process as required, and place in [interim] storage until the proposed NSDF becomes available.” *[emphasis added]*
- High-level and intermediate-level waste also to be consolidated at Chalk River

# Waste generated during closure

8

- EA fails to consider the management of waste generated during operations and closure of the NSDF Project
- This includes decommissioning of support facilities, the Wastewater Treatment Plant (WWTP) and Equalization Tanks
- Both will generate significant amounts of radioactive waste that cannot be placed in NSDF (because performed after closure)

# Conclusion

9

- ❑ Decommissioning of three CNL-operated facilities and management, storage, and disposal of the waste generated at CRL are key activities of the NSDF Project that were omitted from the EA.
- ❑ The Commission cannot fail to examine factual considerations put forward by intervenors.
- ❑ These considerations must be examined for likelihood of significant adverse environmental effects.

# Commission's decision

10

- CNSC staff failed to consider waste consolidation and waste management from WWTF and ET decommissioning in the EA
- This renders its conclusions (e.g. Predicted Changes to the Environment and Predicted Effects on Valued Components) and its recommendations incomplete
- A licensing decision that does not account for these omissions would be unreasonable