



**Written submission from  
Christina and Robbie Anderman**

**Mémoire de  
Christina et Robbie Anderman**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories (CNL)**

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**Laboratoires Nucléaires Canadiens (LNC)**

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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

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

**Commission Public Hearing  
Part 2**

**Audience publique de la Commission  
Partie 2**

**May and June 2022**

**Mai et juin 2022**

Filed on April 5, 2022

To whom it may concern,

We would like to intervene in writing to the May 31 Public Commission Hearing about the request from Canadian Nuclear Laboratories to create a Near Surface Nuclear Waste Disposal Facility near Chalk River, Ontario.

Here is our submission/intervention (also see below with more details the recent media release from Concerned Citizens of Renfrew County):

To the Canadian Nuclear Safety Commission (CNSC)

Please insist that all of the flaws, errors, and omissions, found by the local Citizens Groups, in the Canadian Nuclear Laboratories application for permission to create this proposed nuclear and hazardous near surface waste dump be addressed before the CNSC Commissioners consider making a licensing decision.

This is a decision that deeply affects the future of all life in the Upper Ottawa Valley and along the Ottawa River and St Lawrence River. International Standards for nuclear waste disposal call for a location that is buried deep in rock that is not near a fault line and not near any bodies of water. This proposal for a near surface nuclear and other hazardous waste dump near the Ottawa River in earthquake prone region clearly comes nowhere close to meeting the International Standards for caring for safety for life on this planet.

We stand in solidarity with the Assembly of First Nations who have passed a resolution opposing the proposed facility, The Concerned Citizens of Renfrew County, Ralliement contre la pollution radioactive, The Council of Canadians, the 140 municipalities who have passed resolutions of concern, and Mother Earth who oppose this near surface nuclear waste dump.

Sincerely,

Christina & Robbie Anderman  
Killaloe, ON

See below the local citizens groups' recent media release:

Citizens' groups from Ontario and Quebec provided Canadian Nuclear Safety Commission (CNSC) President Rumina Velshi with [a searing critique](#) of CNSC's case to approve a giant radioactive waste mound alongside the Ottawa River in advance of a February 22nd hearing.

If approved, the giant landfill would stand 60 feet high and hold one million tonnes of mixed radioactive and hazardous wastes. Some of the contents would remain dangerously radioactive for thousands of years, but the mound itself is [only expected to last a few hundred years](#) according to studies produced by the proponent, Canadian Nuclear Laboratories, owned by a consortium of multinational corporations. International safety standards prohibit disposing of long-lived radioactive wastes in landfills.

The citizens' critique of [key licensing documents](#) found eleven critical flaws ranging from a failure to provide detailed information about what would go into the dump, as required under the Nuclear Safety and Control Regulations, to a failure to note serious deficiencies in the siting process for the facility.

"You couldn't find a worse site for this dump if you tried," said Johanna Echlin of the Old Fort William (Quebec) Cottagers' Association, one of the groups that co-authored the citizens' critique. "The site is on the side of a hill, and is surrounded on three sides by wetlands that drain into the Ottawa River, a kilometre away. The water table is just inches under the surface at that location and the bedrock is highly fractured."

The site of the proposed facility is also of concern to downstream communities who take their drinking water from the Ottawa River, including Ottawa, Gatineau and Montreal. The three cities are among the more than 140 municipalities that have passed [resolutions of concern](#) about the proposed dump. The Assembly of First Nations has also passed a resolution opposing the facility.

Ole Hendrickson, a scientist and researcher for the group Concerned Citizens of Renfrew County and Area said there are a number of serious errors in the licensing documents including a [1000-fold overestimate](#) of radioactivity in nearby uranium ore bodies. "That gross overestimate is used by the proponent and the regulator to make the case that the giant mound would be less radioactive than surrounding rocks after a few hundred years," Hendrickson said. "In fact, high-radioactivity waste containers in the dump would exceed levels in surrounding rocks for thousands of years."

The Quebec-based Ralliement contre la pollution radioactive contributed a number of findings to the critique. The group is very concerned about the presence of cobalt-60, which alone will provide 98% of the initial radioactivity in the dump, even though its radioactivity will decline rapidly thereafter. Used cobalt-60 sources require lead shielding because they emit intense gamma radiation that endangers workers.

Physicist Ginette Charbonneau, a spokeswoman for the Ralliement, says that only low-level cobalt-60 sources could be accepted in an above-ground mound and that the criteria for accepting such waste in the dump must be tightened.

"It is also out of the question that long-lived radioactive substances like plutonium be disposed of in a landfill," Charbonneau said. "This is simply a senseless proposal, which is not in line with international standards at all," she added.

The citizens' groups say the case to approve the giant radioactive landfill, called the NSDF by the proponent, is so seriously flawed that CNSC Commissioners cannot make a sound licensing decision based on the contents of the documents. They have asked that the citizens' critique be distributed to

Commissioners at the hearing on Feb 22 and that all of the flaws, errors and omissions be fully addressed before the Commission is asked to make a decision on the license for the dump.