



**Written submission from  
Ontario Power Generation**

**Mémoire d'  
Ontario Power Generation**

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**

April 8, 2022

Commission Registrar  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, ON K1P 5S9  
Email: [intervention@cnsccsn.gc.ca](mailto:intervention@cnsccsn.gc.ca)

**RE: OPG Support of Canadian Nuclear Laboratories' Request for a Licence to Construct a Near Surface Disposal Facility at Chalk River**

To the Commissioners,

Ontario Power Generation (OPG) wishes to intervene in writing to express support for the Canadian Nuclear Laboratories (CNL) application to construct a Near Surface Disposal Facility (NSDF) at Chalk River.

OPG has worked collaboratively with CNL staff, fostering advancement in safety culture and safety practices of CNL (formerly AECL) for over half a century. It was OPG's predecessor company, Ontario Hydro, that operated the first commercial reactor at Douglas Point for Atomic Energy Canada Ltd., the federal entity which today still owns all CNL-managed sites including Douglas Point and Chalk River Laboratories. OPG commends CNL's clear dedication to excellence and its strong culture of nuclear safety at their facilities.

OPG is confident in CNL's ability to safely construct and operate the NSDF for its solid low-level wastes, given the expertise of their group of nuclear professionals and engineers. We observe that the documentation submitted by CNL for all phases of the project, from construction through closure, was subject to rigorous technical assessments by CNSC staff, who concluded that the proposed NSDF project will not have any significant adverse environmental effects. OPG has confidence in the CNSC's regulatory oversight of the NSDF through compliance activities, reviews and monitoring to ensure public safety.

OPG continues its peer-to-peer relationship with CNL through the CANDU Owners Group, which over the years has supported joint activities in improving nuclear safety, benchmarking, and other areas of common interest. In this and other industry fora, such as the World Association of Nuclear Operators and the Canadian Nuclear Association, CNL continually makes valued contributions to the continued success of the Canadian nuclear industry, including safety as the top priority.

On a larger scale, OPG believes it is important for Canada to progress projects for permanent disposal of radioactive waste that meet all regulatory requirements, for two reasons in particular. First, as stated in guidance from the International Atomic Energy Agency, it is the responsibility of the current generation to develop lasting solutions for

radioactive waste disposal, in order to “reduce the burden” on future generations. It is the right thing to do for our children, our grandchildren and all their descendants. Second, progressing toward implementation of permanent disposal will help to give the Canadian public greater confidence in nuclear energy, by demonstrating its sustainability as a source of low-carbon energy today and in the future.

The Canadian government is committed to meeting 2050 targets for reducing carbon emission, and as stated by Natural Resources Canada, no credible path exists to a net-zero economy by 2050 without nuclear energy. OPG recognizes the important role of the public in accepting nuclear power as a sustainable energy source. OPG’s extensive ongoing public engagement in its host communities tells us that attitudes toward nuclear energy depend in part on having safe and feasible solutions for nuclear waste. Sweden and Finland have recently approved the construction of nuclear disposal facilities (in the Scandinavian cases, for used fuel). As a country with a strong and well-regulated nuclear industry, Canada can similarly be a model for progress toward safe disposal, of all levels of radioactive materials.

In conclusion, based on CNL’s strong safety record and the fact that CNL continues to demonstrate a sustained commitment to the highest standards of safety and quality performance, OPG supports CNL’s request to amend its operating licence at Chalk River to include the construction of the NSDF.

Yours sincerely,



Steve Gregoris  
Chief Nuclear Officer  
Ontario Power Generation