



Oral presentation

Exposé oral

**Written submission from
Kinectrics Inc.**

**Mémoire de
Kinectrics Inc.**

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories (CNL)

Laboratoires Nucléaires Canadiens (LNC)

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

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Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station
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Public Commission Hearing, Canadian Nuclear Laboratories' application to amend its Chalk River Laboratories Site Licence to authorize the construction of a Near Surface Disposal Facility, Ref. 2022-H-07

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' strong support for Canadian Nuclear Laboratories' (CNL) application to amend its Chalk River Laboratories Site Licence to authorize the Construction of a Near Surface Disposal Facility (NSDF).

Kinectrics is a proudly Canadian company, committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters are in Etobicoke, Ontario with offices in Pickering, Toronto, Bruce County, Saint John, the United States, Germany, Denmark, Romania, United Kingdom and India. We have over 30 laboratories including CNSC licensed facilities and employ more than 1,100 staff, 70% of whom have technical, science or engineering degrees.

At Kinectrics, we invest in state-of-the-art facilities and tools to provide the best and most comprehensive services to our customers. Our laboratories provide testing facilities for a broad range of areas in support of the nuclear industry, including materials analysis, nuclear radiation safety, and chemical analysis. Our world-class experts deliver services including project management and controls, design engineering and nuclear safety analysis and licensing. In addition to supporting CNL in these areas, we provide similar services to OPG, Bruce Power, Hydro One, other provincial and local utilities, and over 200 clients elsewhere in North America, Europe, the Middle East and Asia.

Kinectrics has provided several key services which have contributed to CNL's research and development program and the continued safe operation of Chalk River Laboratories. For example:



- Assessments and analyses in support of CNL Safety Report updates;
- Hazard identification and analysis of CNL facilities;
- Third Party Review of CNL design strategies to ensure it meets regulatory requirements, and applicable codes and standards;
- Fabrication of plant materials for research and development purposes;
- Materials test and analyses of plant components to characterize performance under various plant conditions; and
- Laboratory analysis of radioactive samples.

Kinectrics has also worked with CNL staff on the safety engineering and licensing for the NSDF. We provided strategic licensing support, project and technical integration, and support in developing the NSDF safety case. Having worked closely with CNL staff on the NSDF development, Kinectrics staff have gained first-hand experience on the high degree of attention and rigor that CNL staff brought to all activities related to the project. By proposing to construct and operate the NSDF, it further re-enforces CNL's value for safety and environmental accountability. It will enable the remediation of the surrounding area of the Chalk River Laboratories and will provide proper disposal of waste to enhance the safeguards for the local community and the Ottawa River.

Kinectrics greatly supports the creation and sustainability of high-quality jobs and the fostering of economic growth within the local community. If approved, the NSDF will enable the revitalization and modernization of the Chalk River Laboratories campus. The construction of the facility will bring in approximately 300 full-time skilled workers, and the operation of the modernized campus will bring in future opportunities for employment, business, supplies and services for CNL and the local community. Additionally, the revitalization and modernization will bolster CNL's research capability to further advance their work on clean energy technology to combat climate change, and health science to fight cancer and diseases.

CNL has demonstrated a strong commitment to the Indigenous communities during the preparation of the NSDF. CNL is working closely with the Indigenous peoples to ensure their rights and interests are represented and their valued species are appropriately protected. CNL is committed to having a positive relationship with the 16 identified Indigenous communities, including the Algonquins of Pikwakanagan First Nation, Algonquins of Ontario and Métis Nation of Ontario. As a proud member of the Canadian Council for Aboriginal Business (CCAB), which aims to strengthen the relationship between Aboriginal and non-Aboriginal peoples, businesses, and communities, Kinectrics is pleased to work with CNL in this regard.



In summary, by working closely with CNL and understanding their principles and safety culture, we are confident CNL is capable of safely constructing and operating the NSDF at the Chalk River Laboratories. The NSDF is part of the long-term solution to Canada's challenge for storing its low-level waste and it will ensure the protection of the people and the environment by addressing it now and not leaving it for future generations. On this basis, we support CNL's application to amend its Chalk River Laboratories Site Licence to authorize the construction of a Near Surface Disposal Facility.

If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or david.harris@kinectrics.com.

Sincerely,

David Harris
President and CEO
Kinectrics Inc.