



**Written submission from
Kathy Eisner**

**Mémoire de
Kathy Eisner**

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

Mai et juin 2022

Filed on April 11, 2022

I would like to make a written intervention as follows:

As a 50-year resident of Renfrew County, I am concerned that the long-term safety of residents and the long-term protection of our natural environment, especially the Ottawa River, may be jeopardized for the sake of a quick and inexpensive approach to disposing of the nuclear wastes from Chalk River and elsewhere in the proposed NSDF.

The 2017 NSDF Environmental Impact Statement examined the trade-off between the speed and cost of constructing a disposal facility, versus its ability to contain wastes. It admitted that, compared to a landfill, a geological facility “would provide increased barriers for potential releases to the environment in the long-term.” But it argued that constructing a geological facility would be an order of magnitude more expensive and “would delay the start of operations beyond 2020.” It concluded that “reduced cost is more preferable as it further contributes to the reduction of the cost of laboratory operations.”

This kind of reasoning is unacceptable. We deserve better. Our children and grandchildren deserve better. Our friends and neighbours who work at the Chalk River facility deserve better. The people who rely on the Ottawa River for water deserve better.

Some of the radionuclides listed in the [reference inventory](#) for the mound are long-lived. This suggests the dump would remain dangerously radioactive long after the 550 years the containment facility is expected to last.

The preliminary decommissioning plans included several different types of facilities some of which offered greater security than a poorly protected mound near the Ottawa River the security of which is not expected to last as long as many of the radionuclides. The top priority should be long-term safety, not cost or profits.

I urge the CNSC to deny approval of this plan and demand a more permanent solution to the storage of these dangerous materials.

Thank you,

Kathy Eisner