



Oral presentation

Exposé oral

**Written submission from
CANDU Owners Group Inc.**

**Mémoire de
CANDU Owners Group 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

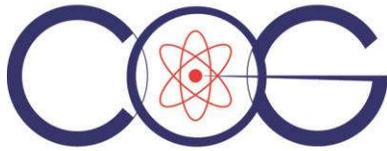
Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May and June 2022

Mai et juin 2022



April 8, 2022

Canadian Nuclear Safety Commission Secretariat
c/o Louise Levert
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046
Ottawa, ON K1P 5S9
Email: cnscc.interventions.ccsn@canada.ca

Subject: Canadian Nuclear Laboratories (CNL) Near Surface Disposal Facility (NSDF), Ref. 2022-H-07

Dear Ms. Levert,

I am writing on behalf of the CANDU Owners Group (COG) in support of CNL's application to amend its Chalk River Laboratories site licence to authorize the construction of a Near Surface Disposal Facility (NSDF). I also wish to indicate my interest in attending the hearing on May 31, 2022, to provide an oral presentation. My presentation will elaborate on the points below.

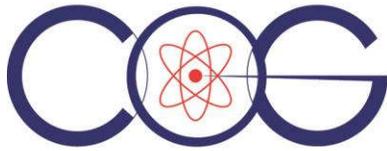
Benefits of licence amendment

CNL is a world leader in developing peaceful and innovative applications from nuclear technology through its expertise in physics, metallurgy, chemistry, biology and engineering. They are committed to ensuring that Canadians and the world receive energy, health and environmental benefits from nuclear science and technology with confidence that nuclear safety and security are assured. The proposed NSDF represents a permanent solution to reduce environmental risk and isolate low-level radioactive waste, in accordance with international guidance and regulatory requirements.

Building the NSDF closes the loop on the lifecycle of nuclear waste. It is a permanent solution to Canada's ongoing challenge of where to store its low-level waste, and the engineered containment mound is internationally recognized as best practice for radioactive waste disposal. Designed to withstand extreme weather and events such as earthquakes, tornadoes, forest fires, major storms and sabotage, the facility is safe and secure.

The NSDF will enable CNL to revitalize their Chalk River Laboratories in order to advance clean energy technology and contribute to medical breakthroughs. The site is a unique source of nuclear science in Canada, producing research in health science and making advances in clean, non-carbon energy to combat climate change and support Canada's goals of a net-zero future.

The facility has been informed by six years of engagement and public feedback, and CNL is committed to continuing the dialogue on responsible waste solutions. Further, CNL is working



closely with Indigenous peoples to ensure Indigenous rights and interests are represented. CNL has chosen the NSDF because it is the right solution for protecting people and the environment.

Collaboration through the CANDU Owners Group

This submission speaks to some of CNL's efforts to continuously strengthen the nuclear industry through its leadership in collaborative efforts. In particular, I will speak to those undertaken in collaboration with other members through COG.

COG is a non-for-profit organization with membership from all CANDU operators both in Canada and internationally. Our mission is "To improve performance of CANDU stations worldwide through member collaboration" with a vision to create excellence.

To fulfill this mission and vision, COG is organized around the following four operational program areas:

- Nuclear Safety and Environmental Affairs
- Research and Development
- Information Exchange
- Joint Projects

In addition, COG has developed a leadership and knowledge management training program to strengthen leadership and management skills amongst high-potential technical managers in the nuclear industry.

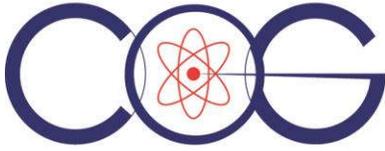
COG members spend approximately \$70 million a year in R&D and Joint Projects to strengthen the safety, reliability, environmental and cost performance of the CANDU nuclear plants.

The work facilitated by COG on behalf of its members relies on capable, knowledgeable, suppliers with deep expertise, human capacity and facilities to undertake ground-breaking nuclear science. This research, and the associated engineering activity, is undertaken mostly in Canada by organizations such as Canadian Nuclear Laboratories.

Further, CNL employees play a significant role in our programs. They share their experiences with others and contribute or play a lead role in all COG program areas. A member of CNL's senior management team, Jeffrey Griffin, is an active COG board member.

Key results achieved and enhanced through full involvement of CNL employees in collaboration with other COG members, via COG, include: CANDU fuel design, advanced fuel design, used fuel inspections, development, verification and validation of fuel, thermalhydraulics, containment and reactor physics computer codes, passive autocatalytic recombiners, Hydrogen research, in-vessel retention experiments, radiopharmaceutical development and testing, low dose radiation research, emergency preparedness, cybersecurity, environmental remediation and clean energy amongst many others.

CANDU Owners Group Inc.



"Excellence Through Collaboration"

I look forward to elaborating on aspects of this letter during my presentation.

Sincerely,

A handwritten signature in grey ink, appearing to read 'S. Smith', with a stylized flourish at the end.

Stephanie Smith
President and CEO
CANDU Owners Group