

Submission by the Canadian Nuclear Society (CNS) to the Canadian Nuclear Safety Commission (CNSC)

Application by Canadian Nuclear Laboratories (CNL) to renew the Nuclear Research and Test Establishment Decommissioning Licence for the Whiteshell Laboratories site for a period of ten years.

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On behalf of the Canadian Nuclear Society, I wish to thank the Canadian Nuclear Safety Commission for the opportunity to make this submission in support of the application by Canadian Nuclear Laboratories (CNL) for a ten-year licence renewal for the decommissioning of the Nuclear Research and Test Establishment at the Whiteshell Laboratories site in Manitoba.

The CNS is Canada's learned society in nuclear science and engineering representing more than 1,000 professionals, scientists and other researchers, engineers and other nuclear professionals engaged in various aspects within Canada's nuclear industry. We do not represent any company or other organization within the industry. The CNS believes that the views of Canada's nuclear professionals, as embodied by its learned society, may provide useful assistance to the CNSC in its deliberations.

In keeping with its mandate, it is the view of the Society that to ensure current and future public acceptability of nuclear science and technology, it is essential to demonstrate that all aspects of nuclear science and technology, from laboratory, to implementation, to waste disposal and site remediation are conducted safely and under regulatory oversight by the CNSC, Canada's independent nuclear regulator.

Moreover, it is the Society's view that public acceptance also requires the demonstrably safe and thorough treatment of facilities that have reached the end of their service lives. This includes not just dealing with nuclear waste, but also site decommissioning and remediation.

The Whiteshell Nuclear Research and Test Establishment is such a site. In accordance with the decision by the federal government, as owner of Atomic Energy of Canada Limited (AECL) the site has been undergoing decommissioning work by Canadian Nuclear Laboratories on behalf of AECL and the government of Canada.

CNL has requested a ten-year extension to its existing decommissioning licence. This period is consistent with current CNSC licence practice. Moreover, the federal government has recognized in its books the financial liability associated with its nuclear legacy sites, including the safe disposal of nuclear waste and the decommissioning and remediation of such sites. Consequently, funding is assured for the requested licence period.

Chalk River Laboratories has developed deep expertise in the handling and disposition of radioactive waste. CNL, under private sector management as a government-owned, company-operated entity has built on this expertise, expanded it, and applied this knowledge to the decommissioning of the Nuclear Research and Test Establishment site.

As at Chalk River, CNL's operations at Whiteshell have displayed a commitment to conventional and radiological safety and excellence in environmental performance. It has met all the CNSC's regulatory requirements, and the Society is of the view that it will continue to do so.

In view of the above, the Canadian Nuclear Society supports the licence application and the requested 10-year term presented to the CNSC by CNL.

Keith Stratton President Canadian Nuclear Society