

August 16, 2017

From: Ole Hendrickson

To: Nicole Frigault, Environmental Assessment Specialist
Canadian Nuclear Safety Commission

By email: cncs.ea-ee.ccsn@canada.ca

Comments on the EIS for the proposed Near Surface Disposal Facility (NSDF) at the Chalk River Laboratories

CEAA Reference number: 80122

August 16, 2017

To: Nicole Frigault, Environmental Assessment Specialist
Canadian Nuclear Safety Commission
P.O. Box 1046 Station B 2
80 Slater Street Ottawa, Ontario K1P 5S9

Dear Ms. Frigault,

I wish to submit the following comments related to the adequacy of the information presented in the environmental impact statement (EIS) for the Near Surface Disposal Facility proposed by Canadian Nuclear Laboratories Limited. The EIS should:

- Provide a description of how the technological details and siting process for a very low level waste facility (mentioned in the Comprehensive Preliminary Decommissioning Plan for the Chalk River Laboratories) were modified to create a proposed facility for low-level and intermediate-level waste;
- Fully document the NSDF Waste Acceptance Criteria and the process for their development; and compare them to criteria used by other countries for very low level waste, low level waste, and intermediate level waste disposal;
- Fully describe procedures for “packaging” and “stabilizing” waste, noting that a key document in this regard (CNL. 2017. “NSDF-Acceptable Waste Packaging.” Revision 1, 232-508600-430-000) has not been provided to the public;
- Include impacts on workers, noting that a key document in this regard (the NSDF Safety Analysis Report) has not been provided;
- Examine the “do nothing” scenario, including a comparison of worker radiation doses between this scenario and the proposed project;
- Describe decommissioning and site remediation priorities associated with the project, how these priorities are set, and their impacts on releases of radionuclides to the Ottawa River and worker radiation doses;
- Provide greater precision to statements that a “few percent” of wastes will be imported from off-site, including clarity on intent to ship wastes from Gentilly-1 and Douglas Point to Chalk River, and types of commercial waste that would be put in the facility; and
- Provide all available information on alpha-emitting wastes at the Chalk River site: how they were created, where they are found on site, and quantities proposed to be put in the NSDF.

Thank you for the opportunity to provide these comments.

Yours sincerely,

Ole Hendrickson
Ottawa, Ontario