

Date: December 19th 2017

From: Blair C. Skinner

To: Candida Cianci, Environmental Assessment Specialist
Canadian Nuclear Safety Commission

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

Subject line: FW: Reminder: Close of the Public Comment Period on the Draft Environmental Impact Statement for the proposed In Situ Decommissioning of the Whiteshell Reactor #1 Project

CEAA Reference number: 80124

Comments:

Good evening Candida,

Here is a submission on behalf of the LGD of Pinawa.

Blair C. Skinner

Mayor of the Local Government District of Pinawa



LOCAL GOVERNMENT DISTRICT OF PINAWA

P.O. Box 100
Pinawa, Manitoba R0E 1L0

<Information Redacted>

B.C. Skinner
Mayor

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G. Smith
Resident Administrator
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December 19, 2017

Sent by email

To: Candida Ciani
Environmental Assessment Specialist
Canadian Nuclear Safety Commission (CNSC)
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OTTAWA, Ontario, Canada
K1P 5S9

Email: cnscc.ea-ee.ccsn@canada.ca

Dear Candida,

I am writing on behalf of the Local Government District of Pinawa with regards to the draft Environmental Impact Statement for the proposed In-Situ Decommissioning of the WR-1 Reactor at the Whiteshell Laboratories submitted by the Canadian Nuclear Laboratories.

We note that the Socioeconomic impacts of the proposed In Situ Decommissioning of the WR-1 reactor has been included in the Draft Environmental Impact Statement as per our request in our letter to the CNSC dated July 4, 2016. This is covered in Section 6.9. In particular, I draw your attention to the Summary page 6-447. The summary simply concludes that the impacts of the project are "Not significant". This conclusion is not appropriate. I would like to address the items under proposed mitigation. The first item concerns the activities of Whiteshell Laboratories Community Regeneration Partnership. We acknowledge that CNL and AECL are both actively participating in the partnership. However, participation in the partnership does not guarantee a significant positive outcome for the future economy for the region. Furthermore, there is no long term commitment to continue to assist with economic development activities for the region after the project is complete. It follows that if there is no significant progress made in economic development for the region by the end of the project, the region will be left with legacy nuclear disposal at the Whiteshell Laboratories site and that will certainly eliminate some economic opportunities for the region as outlined in our letter of July 4, 2016. The other 3 items listed as proposed mitigation are important to communicate the level of hazard and to minimize the level of hazard. However, this will not change the fact that the region will be left with legacy nuclear disposal and this will eliminate some economic opportunities for the region. It is not possible to simply

conclude that this possible outcome is not significant. This can be rectified by a more detailed commitment for both participation in and funding of Whiteshell Laboratories Community Regeneration Partnership activities to facilitate future economic development of the region.

The second item that we wish to address is on page viii of the executive summary:

During decommissioning, consideration will be given to place some equipment from the heat transport system that is currently located on the ground-level reactor floor to a below-grade position for incorporation in the disposal system.

Part of the argument for In-Situ Decommissioning of the WR-1 reactor is to avoid having to handle the below-grade equipment and structure, which would possibly cause the premature release of some of the radioactive material, trapped in place and possibly cause a release to the environment and additional exposure to employees. However, considering the inclusion of some above-grade equipment in the in-situ decommissioning project is counter to that statement. The equipment will have to be handled to move it below grade. Since it has to be handled, it should be appropriately disposed of offsite. This will also reduce the source term for the remaining radioactive material contained in the reactor structure. We are requesting that all above-grade materials be disposed of appropriately and not be incorporated into the In Situ Decommissioning of the WR-1 reactor.

For further discussion of the foregoing, please do not hesitate to contact me at (204)753-2199.

Sincerely,

<Signature Redacted>

Blair C. Skinner
Chairperson of the Whiteshell Laboratories Community Regeneration Partnership
Mayor of the Local Government District of Pinawa

c. Whiteshell Laboratories Community Regeneration Partnership