

Date: December 19th 2017

From: Steve Coupland (Canadian Nuclear Association)

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

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

Subject line: Canadian Nuclear Association comments on Draft EIS for In Situ Decommissioning of
Whiteshell Reactor #1 Project

CEAA Reference number: 80124

Comments:

Please find attached comments on behalf of the Canadian Nuclear Association.

Please confirm receipt of this submission.

Thank you

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Re: Draft Environmental Impact Statement for In Situ Decommissioning of Whiteshell Reactor #1

The Whiteshell Laboratories were established in the early 1960s by Atomic Energy of Canada Limited (AECL) to carry out research on an organic-cooled nuclear reactor as well as to provide a facility for engineering and scientific studies on alternative fuels, fuel channels and reactor coolants. The Whiteshell Reactor #-1 (WR-1) facility has not operated since 1985, is no longer in use and is currently under a monitoring and surveillance program. Canadian Nuclear Laboratories (CNL) is proposing to decommission Whiteshell Reactor #1 as part of its mandate to manage nuclear waste.

The Canadian Nuclear Association (CNA) has reviewed the Environmental Impact Statement and project plans and we believe CNL, led by its world class staff, have developed a scientifically sound and environmentally responsible plan. The CNA is supportive of CNL's revised approach to decommissioning WR-1 through partial dismantling and demolition as well as passive permanent disposal by means of In Situ Decommissioning (ISD).

CNL compiled a detailed comparison of four options prior to deciding on ISD. CNA has had the opportunity to review the detailed analysis CNL conducted prior to concluding ISD was the most feasible approach and is pleased to support CNL's Draft Environmental Impact Statement. ISD is a proven nuclear decommissioning approach that will allow CNL to decommission the WR-1 site in a safe, cost effective manner in a short time and without interim storage. This method also increases worker safety, provides long-term protection of the environment and the public and utilizes minimal resources.



As with all CNA members, safety is the top priority. ISD provides the following safety benefits compared to other options:

- Least amount of mitigation needed to ensure worker dose limits are not exceeded. Accomplished by exposing workers to the least amount of radiation and hazards possible.
- ISD is less extensive and intrusive than the alternatives thereby reducing risk to workers including fewer industrial hazards.
- ISD produces the least amount of waste for disposal offsite therefore reducing the amount of waste handling and transportation risk.

It should be noted that while ISD does require institutional controls, including a long-term monitoring program, ISD has been successfully deployed at many other sites worldwide. Over time long-term monitoring of the site will serve to demonstrate long-term safety for the public and environment

As part of the EIS process, CNL staff (beginning in the summer of 2016) have been actively engaged with the public to explain how ISD works and address any concerns raised. This was done through a wide range of stakeholder engagement methods including public information sessions, presentations to stakeholders and extensive use of social media.

CNL has also engaged local Indigenous communities to discuss the project taking specific account of Indigenous rights, historical or traditional practices and land claims. In addition to the stakeholder engagement techniques listed above, CNL also held specific meetings and arranged for site visits for Indigenous communities.

The nuclear industry in Canada has a long proud history with an exemplary safety and environmental record supported and ensured by our world-class regulatory system. Our members life-cycle approach to our sites is designed to ensure maximum environmental protection and safety. The CNA has full confidence in the solid scientific basis behind this plan and even greater confidence in the dedicated, highly skill CNL staff, who will implement this project.



The CNA is pleased to recommend that CEAA approve the Draft Environmental Impact Statement for In Situ Decommissioning of the Whiteshell Reactor #1 site.

If you have questions or wish to discuss further, please do not hesitate to contact me at couplands@cna.ca

Sincerely,

<Signature Redacted>

Steve Coupland
Director, Regulatory and Environmental Affairs
Canadian Nuclear Association

