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Deep Geological Repository for Canada's Used Nuclear Fuel Project  
Impact Assessment Agency of Canada  
160 Elgin Street, 22<sup>nd</sup> Floor  
Ottawa, ON  
K1A 0H3

**Subject: Kinectrics' Comments on the Initial Project Description Summary for the Deep Geological Repository for Canada's Used Nuclear Fuel Project**

Kinectrics is pleased to have the opportunity to comment on the Nuclear Waste Management Organization (NWMO) Initial Project Description (IPD) Summary for the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project.

Kinectrics is a proudly Canadian company committed to sustainable, long-term global growth. We provide complete life cycle management solutions for the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters are in Etobicoke, Ontario with offices in Pickering, downtown Toronto, Bruce County, the United States, Germany, Denmark, Romania, the United Kingdom, and India. We operate over 30 laboratories including CNSC-licensed nuclear facilities and employ more than 1,300 staff, 70% of whom have technical, science or engineering degrees.

Kinectrics is committed to the safe and sustainable operation of nuclear facilities in Canada and around the world. We share NWMO's vision that the DGR project will provide a safe, responsible, and long-term solution for the management of used nuclear fuel, incorporating both natural and engineered barriers to protect members of the public and the environment.

In partnership with other industry leaders, Kinectrics has been selected to work as part of a collaborative project team to plan and design Canada's first deep geological repository—a first-of-a-kind facility characterized by its reliance on passive safety, geological containment, and performance over geological timeframes. In its role as Nuclear Management Advisor, Kinectrics is applying its expertise in nuclear operations, engineering, facility licensing, nuclear material handling, and radioactive waste management to address the unique challenges of underground construction, engineered barrier system integration, and long-term safety assurance. This experience supports the development and delivery of a robust, licensable DGR design that enables the safe, long-term management of spent nuclear fuel and the continued clean generation of nuclear energy.



NWMO's IPD for the DGR demonstrates a high level of technical maturity and a well-structured application of engineering principles. The submission effectively integrates geological, engineered, and operational considerations into a coherent preliminary design, supported by a clear articulation of safety functions and defence-in-depth consistent with regulatory expectations. Site characterization data is appropriately incorporated into design decisions, with uncertainties transparently identified and managed through conservative assumptions and adaptive, phased implementation. Overall, the IPD reflects alignment with international best practices and provides a credible and robust foundation for progression to subsequent design and safety case development stages.

Kinectrics is a proud member of the Canadian Council for Indigenous Business (CCIB), which aims to strengthen the relationship between Indigenous and non-Indigenous peoples, businesses, and communities. In this regard, we recognize and support NWMO's demonstrated commitment to ongoing engagement with Indigenous communities, including the Wabigoon Lake Ojibway Nation (WLON) and other potentially affected Indigenous groups. Kinectrics shares this commitment and actively works with Indigenous businesses and Indigenous communities in the regions in which we operate.

On this basis, Kinectrics supports NWMO's continued efforts to advance the DGR project.

Sincerely,

David Harris  
President and CEO  
Kinectrics Inc.