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Office of the Auditor General of Canada
Commissioner of the Environment and Sustainable Development
Attention: Petitions
240 Sparks Street
Ottawa, ON K1A 0G6

Via e-mail: petitions@oag-bvg.gc.ca

Canada's Nuclear Legacy Liabilities: Clean-up Costs for the Chalk River Laboratories

This petition is being submitted to the Office of the Auditor General of Canada in accordance with section 22 of the *Auditor General Act* by the Concerned Citizens of Renfrew County and Area (CCRCA) and the Canadian Environmental Law Association (CELA).

CCRCA, a volunteer-based citizens' group, formed in 1978 in response to a 15-year federal-provincial, \$700 million study of the feasibility of disposing of high level nuclear waste in plutonic rock. For more than 20 years, CCRCA has intervened at all licensing hearings on Chalk River Laboratories (CRL) held by the Canadian Nuclear Safety Commission (and prior to the year 2000, by the Atomic Energy Control Board). Our interventions have highlighted pollution issues such as the plumes from the leaking fuel bays and waste management areas and major safety concerns such as the high level liquid wastes in the "Fissile Solution Storage Tank". We have expressed support for new CRL facilities that have reduced pollution levels (such as the Liquid Waste Treatment Centre) and that have placed radioactive wastes in more secure, monitored above-ground storage. We have consistently called for greater transparency and openness in monitoring and reporting on the state of the CRL environment. We believe that our efforts have raised public awareness about risks associated with Canada's nuclear waste liabilities, and have helped persuade government decision-makers to allocate significant resources to clean-up projects such as the Nuclear Legacy Liabilities Program.

CELA works to protect human health and our environment by seeking justice for those harmed by pollution and by working to change policies to prevent such problems in the first place. For almost 50 years, CELA has used legal tools to increase environmental protection and safeguard communities. CELA is an Ontario legal aid environmental law specialty clinic. CELA has worked on issues related to nuclear liabilities, legacy wastes, and nuclear safety over many years. This has included law reform such as the work on replacing the *Nuclear Liability Act*, and amendments to the *Canadian Environmental Assessment Act* in various iterations. Case work has included work at the Chalk River facility, the SRB facility in Pembroke, transportation of nuclear waste, and licensing hearings at the nuclear power plants at Darlington, Pickering, Bruce, Point Lepreau and Gentilly II among others. Current case work includes a number of nuclear waste environmental assessment files, including the proposed Deep Geologic Repository at Kincardine, the ongoing work of the Nuclear Waste Management Organization, the proposal for a Near Surface Disposal Facility at Chalk River, and proposals to abandon in place the former nuclear reactor facilities at Rolphoton and Whiteshell.

Purpose of Petition

The objective of the Nuclear Legacy Liabilities Program (NLLP) was "to safely and cost-effectively reduce the nuclear legacy liabilities and associated risks based on sound waste management and environmental principles in the best interests of Canadians." While we welcomed the creation of the NLLP in 2006 as a positive step

forward in addressing Canada's radioactively contaminated sites, we also sought more engagement of independent experts and the public to ensure that priority problems are properly identified and addressed at the Chalk River Laboratories, where the majority of the nuclear legacy liabilities are found.

The termination of the NLLP in 2015 and the privatization of management and operations of CRL raised our level of concern about management and oversight of federal funding to address Canada's nuclear legacy liabilities. The following petition seeks responses from Natural Resources Canada regarding the Government of Canada's nuclear legacy liabilities: specifically,

- funding amounts for decommissioning, remediation, and waste management activities addressing these liabilities; and
- whether financing is being appropriately allocated towards safely and efficiently reducing risks to health, safety, security and the environment from Canada's nuclear legacy liabilities.

While focusing on financing issues, this petition addresses several of the ways through which sustainable development may be achieved, including:

- protecting the health of Canadians;
- protecting ecosystems;
- meeting international obligations;
- an integrated approach to planning and making decisions that takes into account the environmental and natural resource costs of different economic options and the economic costs of different environmental and natural resource options;
- preventing pollution; and
- respect for nature and the needs of future generations. (Auditor General of Canada 2014).

Historical Background: Chalk River Laboratories and Atomic Energy of Canada Limited

As documented on a Canadian Nuclear Safety Commission (CNSC) website,

The extraction and processing of uranium as well as research into the production of nuclear materials for military purposes are part of Canada's history. The better-known chapter of that history is probably Canada's participation in the Manhattan Project during the Second World War (WWII), when our country supplied and refined uranium for use in U.S. facilities... Less well known to most, perhaps, is our involvement in research to produce and extract plutonium as part of the Manhattan Project... (CNSC 2012).

At an April 1944 meeting in Washington, D.C., the U.S., Great Britain and Canada agreed to build a major new atomic research facility in Canada. Later that year, Chalk River was chosen as the site of this facility. The Chalk River Laboratories (CRL) were to include a nuclear reactor, the NRX, designed to produce plutonium for atomic weapons. The NRX reactor began operating in 1947 after WWII ended, and a second reactor, the NRU, began operating in 1957, enabling research in use of atomic energy for nuclear power as well as weapons (Sims 1980).

In 1952, C.D. Howe, Minister of Trade and Industry, told the House of Commons that "the growing importance of atomic energy and the very substantial investment being made at Chalk River indicates that the management of the operation should be segregated from other government activities..." A new crown corporation, Atomic Energy of Canada Limited (AECL), was created that year (Sims 1980).

AECL developed CANDU reactor technology starting in the 1950s, and subsequently marketed and built CANDU reactors in India, South Korea, Argentina, Romania, and China. Until recently, AECL was one of the world's largest suppliers of medical isotopes (e.g., molybdenum-99 and cobalt-60), produced in CRL's NRU reactor.

In 2011 the Government of Canada sold AECL's CANDU Reactor Division to SNC Lavalin for \$15 million (NRCan 2011a). In 2013 it announced that AECL's nuclear facilities, including CRL, would be run using a "Government-owned, Contractor-operated" (GoCo) model, similar to that in the U.S. and the U.K. (NRCan 2015). In May 2014 it "launched" the Canadian Nuclear Laboratories, Limited (CNL) as a "wholly-owned subsidiary" of AECL, leaving only a few employees in the crown corporation. In June 2015 it selected the "Canadian National Energy Alliance" (CNEA) to operate CNL, effectively privatizing CRL operations (NRCan 2015). A 6-year contract (with options to extend for two, 2-year periods) was signed by AECL, CNL and CNEA in September 2015 (AECL 2015a).

Funding to Reduce Canada's Nuclear Legacy Liabilities

Production of nuclear materials for atomic weapons has left a lasting legacy of radioactive wastes at CRL. According to Natural Resources Canada (NRCan), "More than half of the nuclear legacy liabilities under the responsibility of the GoC... are the result of Cold War activities during the 1940s, 50s and early 60s... the remaining liabilities stem from R&D for nuclear reactor technology, the production of medical isotopes, and national science programs." Estimated at about \$7 billion, these environmental liabilities consist of "buildings, a wide variety of buried and stored waste and affected lands" (NRCan 2011b). According to the CNSC, "Approximately 70 percent of the liabilities are located at CRL" (CNSC 2011). However, "Due to the limitations associated with the waste characterization practices in the past, and the loss of waste-receipt records predating 1956 due to a fire, the total activities are not well known" (Government of Canada 2005).

AECL's mandate is "to enable nuclear science and technology and fulfill Canada's radioactive waste and decommissioning responsibilities" (AECL 2017). The 2004-2005 budget included \$29,000,000 for an AECL program activity called "Waste Management and Decommissioning". The Main Estimates for 2005-2006 through 2015-2016 retained this program activity but allocated no funding to it.

The 2005-2006 and 2006-2007 Main Estimates included a footnote stating that "Waste Management and Decommissioning is funded from the net proceeds of government-funded heavy water sales."

On June 2, 2006, the Government of Canada announced a commitment of \$520 million to fund the five-year start-up phase of the Nuclear Legacy Liabilities Program (NLLP), with an objective "to safely and cost-effectively reduce the nuclear legacy liabilities and associated risks based on sound waste management and environmental principles in the best interests of Canadians." In 2011, Natural Resources Canada (NRCan) released an evaluation of the NLLP's first three years that includes ten recommendations intended to assist NRCan management in improving the future delivery of the Program (NRCan 2011b).

One of these ten recommendations was that "NRCan should encourage AECL to explore the possibilities of using incentives successfully implemented by other countries in the delivery of nuclear decommissioning programs to support achievement of NLLP objectives." The NLLP evaluation also refers to "a long-term 70-year strategy to deal with nuclear legacy liabilities" approved by the federal government in April 2006. This strategy was to be revised to take into account feedback received during public consultations, originally scheduled to start in late 2006 or early 2007.

Evaluation findings in the 2011 Report included the following:

- there was a recognized need for NRCan to enhance its oversight role for the NLLP, which included the oversight of funds spent;
- the plan developed for the start-up phase of the NLLP was not based on adequate information about the location and nature of the radioactive contaminants on the AECL site;
- Actual costs of the NLLP decommissioning work are generally higher than estimated;
- AECL does not have an integrated system for managing overall cost and time resource expenditures of all NLLP projects against a master schedule and budget... it is difficult to discern what percentage of the planned projects has been completed compared to the budget.

In all, the NLLP “received more than \$1.15 billion in funding over nine years.” With regard to actual costs, “In 2013, AECL completed a review of its long-term decommissioning strategy and updated its cost estimate to complete the NLLP to about \$10 billion (current day Canadian dollars)” (Government of Canada 2013).

Although the NLLP ended when the GoCo arrangement was implemented, AECL remains the “owner” of Canada’s nuclear legacy liabilities. Cost estimates for these environmental liabilities are included in the accounts payable and accrued liabilities line item of the Government of Canada’s consolidated financial statements. Reductions in these cost estimates improve the national balance sheet. AECL’s contract with CNL requires the latter “to substantially reduce Canada’s radioactive waste and decommissioning liabilities,” and “to ensure that its Proposed Annual Program of Work and Budget specifies an estimate of the change in AECL’s radioactive waste and decommissioning liabilities” (AECL 2015). The 2016-2017 budget, reflecting the transition to the GoCo model, allocated \$969 million for AECL, with \$520.1 million specifically earmarked to accelerate “Decommissioning and Waste Management”:

The objective is to safely and efficiently reduce the Government of Canada’s radioactive waste liabilities, including associated risks to health, safety, security and the environment. The focus is on enabling Canadian Nuclear Laboratories to significantly advance infrastructure decommissioning, site remediation and waste management for Canada. Funding for these activities was previously provided through Natural Resources Canada’s Nuclear Legacy Liabilities Program, the Port Hope Area Initiative and the Low-level Radioactive Waste Management Office, and as such, would not have been reflected in Parliamentary Appropriations to AECL. Starting in 2016–17, all funding for these activities is being provided directly to AECL through the Main Estimates, with increased funding to accelerate work that will reduce risks and discharge Canada’s radioactive waste liabilities faster. (Main Estimates, 2016-2017)

One of the “Highlights” in AECL’s section of the 2017-2018 Main Estimates reads as follows:

Starting in 2016–17, AECL received all funding necessary to deliver on its mandate through the Main Estimates. This differs from previous years, when AECL received funding from a variety of sources, including Main and Supplementary Estimates, transfers from Natural Resources Canada and, occasionally Treasury Board Central Votes. This explains, in part, the variance between the amounts noted under 2015–16 Expenditures and 2017–18 Main Estimates presented in this document.

Following implementation of the GoCo model, AECL’s Main Estimates in fiscal year 2016-2017 alone exceeded the total Main Estimates for the previous five fiscal years (2011-2016) (Table 1). No funding was allocated in the Main Estimates to Waste Management and Decommissioning during the 2011-2016 period. However, AECL’s total Expenditures for the 2011-2016 period exceeded its total Main Estimates by more than \$1.5 billion. It is likely that a significant amount of AECL’s Expenditures for this period were for Waste

Management and Decommissioning, given that the NLLP received more than \$1.15 billion in funding over nine years (Government of Canada 2013), but this cannot be determined from the Main Estimates.

Table 1. Main Estimates and Expenditures for Atomic Energy of Canada Limited, 2011-12 to 2017-18

Budget year	Main Estimates					Expenditures
	Facilities and Nuclear Operations	Research and Development	Commercial Business	Waste Management and Decommissioning	Total Main Estimates	
2011-12	67,006	35,137			102,143	719,031
2012-13	67,006	35,137	274,552		376,695	551,843
2013-14	67,006	35,137	108,919		211,062	385,463
2014-15	67,006	35,137			102,143	326,743
2015-16	67,006	35,137	17,000		119,143	491,064
Sub-total, 2011-16	335,030	175,685	400,471		911,186	2,474,164
2016-17	438,800			529,800	968,616	
2017-18	450,900			520,100	971,055	

A comparison of AECL’s average annual Expenditures for the 2011-2016 period (at \$494 million/year) to funding in the 2017-2018 Main Estimates (\$971 million) indicates that annual Parliamentary appropriations to AECL essentially doubled as a result of implementation of the GoCo model. The bulk of this increased funding for AECL likely flows directly to CNL/CNEA (i.e., the private corporations that are members of the CNEA consortium). This increased funding would need to cover the CNL executive and senior management contract costs (salaries, fees, bonuses and expenses) plus the salaries of the ~ 45 remaining AECL employees who have been retained to oversee the GoCo contracts.

It should be noted that a large portion of AECL’s Main Estimates (and presumably Expenditures) during the 2011-2016 period - more than \$400 million - were directed to the AECL’s “Commercial Business” program activity. Prior to fiscal year 2010-2011, the Main Estimates for AECL contained a footnote stating “No funding is provided to the Commercial Business program activity as this activity is self-sustaining.”

However, in the 2012-2013 and 2013-2014 Main Estimates, \$274 million and \$109 million, respectively, were allocated to commercial business “to address pre-existing commercial commitments associated with the divestiture of AECL’s CANDU Reactor Division to Candu Energy Inc.” The 2013-2014 Main Estimates explained that the \$109 million for commercial business in that fiscal year was “provided for information purposes,” as it represented “statutory forecasts” that were “consistent with the *Jobs and Economic Growth Act*” and that did not therefore require additional approval by Parliament. Another \$17 million for AECL’s commercial business in the 2015-2016 Main Estimates was also “to address pre-existing commercial commitments associated with the divestiture of AECL’s CANDU Reactor Division to Candu Energy Inc.”

It can be concluded that AECL’s annual budget for activities currently in its mandate more than doubled following implementation of the GoCo model. AECL’s budgets prior to the 2016-2017 fiscal year included sizeable funding for the CANDU Reactor Division, which is no longer part of AECL’s mandate. Deducting that funding from AECL’s Expenditures for the 2011-2016 period, the \$971 million in AECL’s 2017-2018 Main Estimates was 2.34 times AECL’S average annual Expenditures (\$415 million) during the pre-GoCo period.

What did Canada’s taxpayers get in return for this sizeable increase in funding to AECL? Did it “accelerate work that will reduce risks and discharge Canada’s radioactive waste liabilities faster”?

A New Approach to Reducing the Government of Canada’s Nuclear Legacy Liabilities at the Chalk River Laboratories

In October 2015, CNL informed CNSC that it is pursuing a new path for disposal of the Government of Canada’s legacy wastes, addressing the following clauses in CNL’s “operations” contract (AECL 2015b):

- CNL shall seek the fastest, most cost effective way(s) of executing the DWM [Decommissioning and Waste Management] Mission including disposal of all waste.
- Once approved by AECL and the Regulatory Authority, CNL shall perform all subsequent activity including the design, build and commissioning to achieve a fully licensed LLW [low-level waste] disposal or LTWM [long-term waste management] facility, with a target completion date of six years following the [2015] Commencement Date.

Having a disposal facility ready to accept wastes by 2021 would represent a dramatic acceleration of the timetable in the current Comprehensive Preliminary Decommissioning Plan (CPDP) for the Chalk River site, which assumes that a facility will not be available to receive wastes until 2035 (AECL 2014).

Details of CNL’s proposed “Near Surface Disposal Facility” (NSDF) project are now available (CNSC 2017). In May 2016 CNSC commenced an environmental assessment and released CNL’s initial NSDF project description. In September 2016, CNSC issued a notification that CNL had revised its project description to include intermediate-level wastes in the NSDF. In March 2017, a full environmental impact statement (EIS) was released for public comment (CNL 2017). The EIS says that CNL intends to:

- reduce its radioactive waste stores, to decommission more than 100 buildings and structures that are not needed for future CNL missions, and to remediate various WMAs [waste management areas] at the CRL property;
- close the WL [Whiteshell Laboratories] and the NPD [Nuclear Power Demonstration] prototype reactor site and ship the waste that is not disposed in situ with the reactors to CRL; and
- continue to accept waste on a commercial basis. (CNL 2017)

The EIS then states, “**All of the waste from the aforementioned activities** (emphasis added) is intended to be disposed in the ECM [“engineered containment mound”] to be established under the NSDF Project” (CNL 2017).

The proposed “ECM” would be similar in design to a municipal landfill. CNL is proposing to put a wide variety of low- and intermediate-level nuclear legacy wastes, many with long half-lives, in an 18-meter-high mound, over top of plastic liners, adjacent to the wetlands in the Perch Creek basin, within a few hundred meters of some of the most contaminated leaking waste sites on the CRL property, less than 1.5 kilometers from the Ottawa River. After 50 years of operation, a cover would be placed over the wastes.

How much would this cost? Section 2.5.3.1.2 of the EIS (“Economic Feasibility”) says that:

The estimated cost to build (i.e., capital expenditures,) the NSDF for the 1,000,000 m³ of CNL waste is \$250 M. This estimate includes site preparation and construction of the engineered containment mound, supporting facilities and buildings, and access roads. Operating costs associated with a 50-year operating life, site closure costs and surveillance and long-term maintenance costs for a 30 year period following end of operations are estimated at \$580 M. This results in a total lifecycle cost of \$600 M for the NSDF Project.

While noting a discrepancy between total cost and the sum of operating construction and costs, the NSDF would appear to provide significant cost savings compared to the NLLP evaluation report estimate of \$7 billion for all of the Government of Canada’s nuclear legacy liabilities (NRCAN 2011b), the estimate of \$10 billion to complete the NLLP activities (Government of Canada 2013), or the CPDP’s \$6.1 billion net present value cost estimate as of 2013 March for decommissioning CRL (AECL 2014). “Economic feasibility” is a primary justification for selecting a landfill as the preferred waste disposal alternative. The EIS estimates that costs of alternative means for carrying out the project would be much higher (Above-ground Concrete Vaults – \$3.4 billion; Geologic Waste Management Facility - \$10 billion) (CNL 2017). If licensed by the CNSC, the NSDF will be Canada’s first permanent disposal facility for radioactive wastes from nuclear reactors.

The NSDF project represents a radical departure from the CPDP (AECL 2014) and from AECL’s plan for the NLLP in the 2011–2016 licence period described in the *Protocol for the Nuclear Legacy Liabilities Program* (CNSC 2011). Concerns are being raised about the project’s long-term health and environmental costs. According to the EIS, wastes in the mound would be exposed to wind and precipitation during operations. A water treatment plant would remove only some of the contaminants leaching from the waste mound. After closure the waste mound would deteriorate as part of “normal evolution”. If the top cover fails before the bottom liners, as is likely, the EIS (section 5.3.2.6, “Residual Effects Analysis”) indicates that a “bathtub scenario” will ensue: the bottom liners will trap water leaching through the radioactive wastes, and a significant flux of radionuclides will flow out of the waste mound into Perch Creek and into the Ottawa River 1.5 km away (CNL 2017).

Long-lived radioactive elements disposed of in the mound (such as americium, uranium, neptunium and plutonium) would contaminate the Ottawa River. Large numbers of people living downstream (Ottawa, Gatineau, Montreal) would be exposed to elevated radiation levels in their drinking water for a very long time.

Critics maintain that this approach is inconsistent with guidance provided by the International Atomic Energy Agency (IAEA) in its *Safety Standard SSR-5, Disposal of Radioactive Waste*. The IAEA *Safety Standard* says that a landfill-type facility is suitable only for very low level radioactive waste, and certainly not for radioactive wastes with long half-lives such as those that CNL proposes to place in the mound. The IAEA says:

The disposal facility shall be sited, designed and operated to provide features that are aimed at isolation of the radioactive waste from people and from the accessible biosphere. The features shall aim to provide isolation for several hundreds of years for short lived waste and at least several thousand years for intermediate and high level waste. (IAEA 2011)

A submission to the CNSC from AECL's former Director of Safety Engineering and Licensing and former "primary champion" for the *Protocol for the Nuclear Legacy Liabilities Program* (CNSC 2011) contains the following comments on the environmental impact statement for the NSDF:

- The proposal employs inadequate technology and is problematically located;
- The proposal does not meet regulatory requirements with respect to the health and safety of persons and the protection of the environment; and
- The authors have failed to meet the requirements of the *Canadian Environmental Assessment Act 2012*. (Walker 2017)

If the NSDF cannot meet regulatory requirements for health, safety and protection of the environment, then a great deal of money, time and effort will have been wasted in a failed effort to accelerate the reduction of the nuclear legacy liabilities currently on the balance sheet of the Government of Canada.

This Background provides context for the following questions. These questions are directed to Natural Resources Canada, the federal department with primary responsibility to ensure that Canada's nuclear legacy liabilities -- and the risks they pose to health, safety, security and the environment -- are being safely and efficiently reduced. We ask that the petition be forwarded to other relevant departments.

Petition questions:

1. What were the total amounts and sources of funding for waste management and decommissioning activities related to Canada's nuclear legacy liabilities during the 2005-2016 period?
2. What were the funding amounts, objectives, and accomplishments of the Nuclear Legacy Liabilities Program during the 2005-2016 period?
3. What changes were made to the Nuclear Legacy Liabilities Program during the 2011-2016 period to address the recommendations and findings of the 2011 NLLP evaluation report?
4. Does Natural Resources Canada intend to play an effective oversight role in addressing the Government of Canada's nuclear legacy liabilities in light of the transition to direct funding of AECL in the 2016-2017 Main Estimates? If so, how will this be done?
5. What was the planning basis for AECL's increased overall funding, and AECL's increased funding for decommissioning and waste management, in the 2016-2017 and 2017-2018 Main Estimates?
6. What is the current amount for nuclear legacy liabilities in the accounts payable and accrued liabilities line item in the Government of Canada's consolidated financial statements? How are cost estimates for Canada's nuclear legacy liabilities calculated?
7. What is the evidence that the GoCo model for management and operation of the Canadian Nuclear Laboratories has yielded measurable cost savings and a measurable reduction of risks to health, safety, security and the environment from nuclear legacy liabilities at the Chalk River Laboratories and elsewhere in Canada? What evidence was used to conclude that a GoCo model has been used

- successfully in the delivery of nuclear decommissioning projects elsewhere? Who reviewed this evidence? What steps have been taken to avoid the situation that arose in the U.K., whose government canceled the GoCo contract for Sellafield, the country's largest nuclear waste site (BBC News 2015)?
8. What features of Canadian National Energy Alliance's bid led to its being awarded a contract to manage the Canadian Nuclear Laboratories? Was it the lowest bid? Did its bid specifically include a landfill-type facility? What waste management approaches and cost estimates were proposed by other bidders?
 9. What incentives are incorporated in the contracts awarded by AECL to CNL/CNEA related to achieving the "fastest, most cost effective way(s) of executing the DWM Mission including disposal of all waste," and completing a fully licensed LLW disposal facility by 2021?
 10. Before his appointment as AECL President and CEO, Mr. Richard Sexton had worked for Energy Solutions (now Atkins) and CH2M in senior positions. These two companies are members of the CNEA consortium that was awarded the GoCo contract with AECL. How were conflict of interest guidelines applied to his appointment? How can he be deemed not to be in a conflict of interest situation?
 11. Was a decision made to abandon or ignore AECL's Comprehensive Preliminary Decommissioning Plan for CRL (AECL 2014), its waste characterization information, and its cost estimates, in the context of advancing the NSDF Project? If so, who made this decision and/or was privy to it?
 12. What percentage of the work of characterizing the nuclear legacy wastes at the Chalk River Laboratories has been completed? What gaps remain in the information required to determine an acceptable approach to their disposal? What sources of information about their location and radioactive contaminants are being used to ensure that the risks they pose to health, safety, security and the environment are well identified and understood?
 13. Noting that the proposed "Engineered Containment Mound" would not conform to IAEA guidance for radioactive waste disposal, and that alternatives would be more expensive, will the Government of Canada review the cost estimates in section 2.5 ("Alternative Means for Carrying out the Project") in the NSDF Environmental Impact Statement, also taking into account section 19(1)(g) of the *Canadian Environmental Assessment Act*? How will the Minister choose a preferred alternative for managing the Government of Canada's nuclear legacy liabilities?
 14. Will the Minister acknowledge that the NSDF Project does not provide a sound basis for managing the Government of Canada's nuclear legacy liabilities?
 15. How will the Government of Canada decide on a safe, efficient and acceptable approach to reducing health, safety, security and environmental risks from Canada's nuclear legacy liabilities at the Chalk River Laboratories?

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Names of the groups:

Concerned Citizens of Renfrew County and Area

Canadian Environmental Law Association

We hereby submit this petition to the Auditor General of Canada under section 22 of the Auditor General Act.



Ole Hendrickson

Date: June 20, 2017