

**Environmental Remediation Management**  
**Reactor Decommissioning**  
**Prototype Reactor Decommissioning**

22-CNNO-19-0008-L  
KS-2019-007

2019 July 18

Mr. M. Leblanc  
Commission Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, Ontario, K1P 5S9

Dear Mr. Leblanc:

**Application for Licence Amendment to Proceed with Phase 3 Decommissioning  
at Douglas Point Waste Facility**

The purpose of this letter is to submit an application to the Canadian Nuclear Safety Commission (CNSC) for an amendment of the Douglas Point Waste Facility (DPWF) Decommissioning Licence, WFDL-W4-332.02/2034 [1] to proceed with Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of the DPWF.

**BACKGROUND INFORMATION**

The Douglas Point Nuclear Generating Station (DPNGS) consisting of a 200 MWe (Megawatt Electrical) prototype CANada Deuterium Uranium (CANDU) Reactor, was placed in service in 1968 and was operated until 1984. The control of DPNGS was turned over from Ontario Hydro to Atomic Energy of Canada Limited (AECL) in 1985. A "Deferred Decommissioning" approach was selected by AECL. In 2000, the Atomic Energy Control Board replaced the Operating Licence of DPNGS with a Waste Facility Operating Licence [2] and identified Douglas Point Nuclear Generating Station (DPNGS) as Douglas Point Waste Facility (DPWF). In 2014 July, on the basis of continued Storage with Surveillance (SWS) activities only, the CNSC issued a 20-year Waste Facility Decommissioning Licence (WFDL) that covered all three Prototype Waste Facilities (i.e., DPWF, Gentilly-1 Waste Facility (G-1WF), and Nuclear Power Demonstration Waste Facility (NPDWF) [3]). With the restructuring of AECL in 2015, the licence was transferred to Canadian Nuclear Laboratories (CNL), which now operates the facility on behalf of AECL.

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In 2018 July, CNL requested the CNSC [4] to administratively split the Waste Facility Decommissioning Licence [3] into three separate licences, one for each of DPWF, G1WF, and NPDWF. This was mainly because the decommissioning strategy will vary based on the site, reactor, and surrounding environment characteristics, and the final decommissioning at each site will be carried out at different timelines. Therefore, the final decommissioning of these sites will require an amendment to their licence. To this effect, in 2019 February, the CNSC issued individual licences to each waste facility.

The current DPWF Decommissioning Licence [1] was granted on the basis of continued SWS activities. Canadian Nuclear Laboratories is now planning to enter into an active phase of decommissioning at the DPWF site in which all remaining facilities will be dismantled and demolished by following a graded approach, which requires the current DPWF Decommissioning licence to be amended.

On 2019 February 13, CNL provided CNSC staff with notification of its intention to proceed with the Phase 3 Decommissioning at the DPWF site [5].

#### APPLICATION FOR LICENCE AMENDMENT

Pursuant to the *Nuclear Safety and Control Act* and associated regulations, CNL is requesting that the Commission, or a person authorized by the Commission, amend the current DPWF Decommissioning Licence [1] to authorize CNL to proceed with Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of DPWF.

Attachment A provides a clause-by-clause statement for relevant excerpts from the Act and relevant CNSC Regulations, and describes how CNL meets these requirements as per the compliance verification criteria prescribed by the CNSC in the DPWF Licence Conditions Handbook [6].

Additionally, CNL would like to notify that the DPWF Preliminary Decommissioning Plan [7] is cancelled and superseded by Detailed Decommissioning Plan (DDP) Volume 1 – Program Overview [8] subject to the CNSC acceptance. Furthermore, DPWF SWS Plan document [9] is also cancelled and superseded by DDP Volume 1 [8] and SWS Activities and Schedules [10].

Canadian Nuclear Laboratories looks forward to hearing from the Commission with respect to this application. In the interim, should you require any further information, please contact Ian Bainbridge (Facility Authority, DPWF) at 613-584-3311, extension 42939, or myself at 613-584-3311, extension 42892.

Sincerely

Kristan Schruder  
General Manager, Reactor Decommissioning

KS/bc

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#### ENCLOSURES: (4)

- Douglas Point Waste Facility Storage with Surveillance Activities & Schedules
- Douglas Point Waste Facility Detailed Decommissioning Plan Volume 1: Program Overview
- Environmental Review for Douglas Point Waste Facility - Phase 3 Decommissioning
- Environmental Risk Assessment for Douglas Point

#### REFERENCES:

- [1] Waste Facility Decommissioning Licence for Douglas Point Waste Facility, WFDL-W4-332.02/2034, Expiry Date: 2034 December 31.
- [2] Douglas Point Waste Management Facility Operating Licence, AECB-WFOL-332-4.3, 2000 August.
- [3] Waste Facility Decommissioning Licence for Prototype Waste Facilities, WFDL-W4-332.01/2034, Expiry Date: 2034 December 31.
- [4] K. Kehler, Letter to H. Tadros, Request to Separate the Waste Facility Decommissioning Licence, WFDL-W4-332.01/2034 to Three Separate Licences for Douglas Point, Gentilly-1, and Nuclear Power Demonstration Waste Facilities, 140-CNNO-18-0003-L, 2018 July 11.
- [5] Canadian Nuclear Laboratories Intention to proceed with Physical Decommissioning of Douglas Point Waste Facility, 22-CNNO-19-0002-L, 2019 February 13.
- [6] Licence Conditions Handbook, Prototype Waste Facilities – Waste Facility Decommissioning Licence, Douglas Point Waste Facility, WFDL-LCH-W4-332.02/2034, 22-508760-HBK-001, Revision 0, 2019 June 18.
- [7] Douglas Point Waste Facility Preliminary Decommissioning Plan, 22-00960-PDP-001, Revision 2, 2016 April.
- [8] Douglas Point Waste Facility Detailed Decommissioning Plan Volume 1: Program Overview, 22-00960-DDP-001, Revision 0, 2019 July.
- [9] Douglas Point Waste Facility Storage with Surveillance Plan, 22-00960-SWS-001, Revision 2, 2015 March.
- [10] Douglas Point Waste Facility Storage with Surveillance Activities & Schedules, 22-00960-SWS-002, Revision 0, 2019 July.

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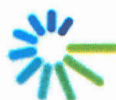
R. Clarke (CNSC)  
A. Mostafa (CNSC)  
K. Murthy (CNSC)  
K. Ross (CNSC)  
H. Athauda-Arachchige  
I. Bainbridge  
P. Boyle  
S. Brewer

S. Bukhari  
S. Cotnam  
J.D. Garrick  
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S. Karivelil  
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## APPENDIX A COMPLIANCE VERIFICATION FOR 2019 PROTOTYPE REACTORS WASTE FACILITIES LICENCE AMENDMENT

Section	Requirement	CNL Response
<b>Nuclear Safety and Control Act</b>		
24(2)	The Commission may issue, renew, suspend in whole or in part, amend, revoke, or replace a licence, or authorize its transfer on receipt of an application: (a) in the prescribed form;	This attachment with the cover letter provides the information required by the Nuclear Safety and Control Act (the Act) and the Regulations made pursuant to the Act, and constitutes an application by CNL to amend the current DPWF Decommissioning Licence [A-1]. Other supporting material will be provided to CNSC staff, as required, under separate cover.
	(b) containing the prescribed information and undertakings and accompanied by the prescribed documents; and	See response above under clause 24 (2)(a).
	(c) accompanied by the prescribed fee.	CNL is in good standing with respect to the provision of CNSC licensing fees and will provide any additional fees, as and when required.
24(4)	No licence may be issued, renewed, amended or replaced – and no authorization to transfer one given – unless, in the opinion of the Commission, the applicant: (a) is qualified to carry on the activity that the licence will authorize the licensee to carry on; and	CNL understands that qualification will be determined through consideration by the Commission of this application and the associated supporting material as well as deliberation through the Commission public hearing/ meeting process.
	(b) will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.	CNL understands that adequate provision will be determined through consideration by the Commission of this application and the associated supporting material as well as deliberation through the Commission public hearing/ meeting process.
24(5)	A licence may contain any term or condition that the Commission considers necessary for the purposes of this Act, including a condition that the applicant provide a financial guarantee in a form that is acceptable to the Commission.	CNL understands the requirement for an acceptable financial guarantee. While ownership of CNL has transferred to the Canadian National Energy Alliance, Atomic Energy of Canada Limited retains ownership of the lands, assets and liabilities associated with CNL's licences.





ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>Nuclear Safety and Control Act</b>		
		These liabilities have been officially recognized by the Minister of Natural Resources in a letter dated 2015 October 01 [A-2] to comply with Licence Condition 2.2 of the DPWF Licence Conditions Handbook (LCH) [A-3].
25	The Commission may, on its own motion, renew, suspend in whole or in part, amend, revoke or replace a licence under the prescribed conditions.	CNL understands the clause and no response is required.
26	Subject to the regulations, no person shall, except in accordance with a licence: (a) prepare a site for, construct, operate, modify, decommission or abandon a nuclear facility;	CNL understands the clause and no response is required.

Section	Requirement	CNL Response
<b>General Nuclear Safety and Control Regulations</b>		
3	(1) An application for a licence shall contain the following information: (a) the applicant's name and business address;	Applicant's Name: Canadian Nuclear Laboratories Ltd. Business address: Canadian Nuclear Laboratories Ltd. Chalk River Laboratories 286 Plant Road Chalk River, Ontario K0J 1J0 Official Language: English Contact Person, Signing Authority and Licence Holder: Kristan Schruder General Manager, Reactor Decommissioning Site Licence Holder Canadian Nuclear Laboratories Ltd. Telephone: 613-584-8811, extension 42892



Section	Requirement	CNL Response
<b>General Nuclear Safety and Control Regulations</b>		
	(b) the activity to be licensed and its purpose;	CNL intends to proceed with decommissioning of DPWF as described in Program Overview DDP Volume 1 [A-4]. CNL requests to amend the current licence to allow to proceed with the Phase 3 Decommissioning involving dismantling and demolition of all remaining non-nuclear and nuclear buildings, structures, systems and components.
	(c) the name, maximum quantity and form of any nuclear substance to be encompassed by the licence;	This information is provided in the Program Overview DDP Volume 1 [A-4].
	(d) a description of any nuclear facility, prescribed equipment or prescribed information to be encompassed by the licence;	The Program Overview DDP Volume 1 [A-4] provides information about the current configuration.
	(e) the proposed measures to ensure compliance with the Radiation Protection Regulations, the Nuclear Security Regulations and the Packaging and Transport of Nuclear Substances Regulations, 2015.	Compliance with the Radiation Protection Regulations, the Nuclear Security Regulations and the Packaging and Transport of Nuclear Substances Regulations is ensured through the implementation of CNL's Radiation Protection Program [A-5], [A-6], the Physical and Cyber Security Programs [A-7], [A-8], [A-9], [A-10] and the Transportation of Dangerous Goods Program [A-11], [A-12] (as per Licence Conditions 9.1, 14.1, and 16.1 of the DPWF LCH [A-3].
	(f) any proposed action level for the purpose of Section 6 of the Radiation Protection Regulations;	Action levels for the prototype waste facilities are defined in Licence Condition 9.2 of the DPWF LCH [A-3].
	(g) the proposed measures to control access to the site of the activity to be licensed and the nuclear substance, prescribed equipment or prescribed information;	Compliance with this requirement is ensured through implementation of the Physical and Cyber Security Programs [A-7], [A-8], [A-9], [A-10] as per Licence Condition 14.1 of the DPWF LCH [A-3].
	(h) the proposed measures to prevent loss or illegal use, possession or removal of the nuclear substance, prescribed equipment or prescribed information;	Compliance with this requirement is ensured through implementation of the Physical and Cyber Security Programs [A-7], [A-8], [A-9], [A-10] as per Licence Condition 14.1 of the DPWF LCH [A-3].
	(i) a description and the results of any test, analysis or calculation performed to substantiate the information included in the application;	Substantiation of the information included with this application is demonstrated through the implementation of annual reporting requirements as defined in Licence Condition 5.1 of the DPWF LCH [A-3].
	(j) the name, quantity, form, origin and volume of any radioactive waste or hazardous waste that may result from the activity to be	Specific information on radioactive waste and hazardous waste is presented in the Program Overview DDP Volume 1 [A-4] and the 2018 Annual Compliance





ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>General Nuclear Safety and Control Regulations</b>		
	licensed, including waste that may be stored, managed, processed, or disposed of at the site of the activity to be licensed, and the proposed method for managing and disposing of that waste;	Monitoring Report [A-13].
	(k) the applicant's organizational management structure insofar as it may bear on the applicant's compliance with the Act and the Regulations made under the Act, including the internal allocation of functions, responsibilities and authority;	CNL's senior management organizational structure is documented in the Management System Manual [A-14].
	(l) a description of any proposed financial guarantee relating to the activity to be licensed; and	CNL understands the requirement for an acceptable financial guarantee. While ownership of CNL has transferred to Canadian National Energy Alliance, Atomic Energy of Canada Limited retains ownership of the lands, assets and liabilities associated with CNL's licences. These liabilities have been officially recognized by the Minister of Natural Resources in a letter dated 2015 October 01 [A-2] to comply with the Licence Condition 2.2 of the DPWF LCH [A-3].
	(m) any other information required by the Act or the Regulations made under the Act for the activity to be licensed and the nuclear substance, nuclear facility, prescribed equipment or prescribed information to be encompassed by the licence.	CNL understands this requirement and will provide any other additional information upon request.  Substantiation of the information included with this application is demonstrated through the implementation of annual reporting requirements as defined in the Licence Condition 5.1 of the DPWF LCH [A-3].
	(1.1) The Commission or a designated officer authorized under paragraph 37(2)(c) of the Act, may require any other information that is necessary to enable the Commission or the designated officer to determine whether the applicant  (a) is qualified to carry on the activity to be licensed; or	CNL understands this requirement and will provide any other additional information upon request.  The framework for CNL to carry out licensed activities is covered through the Management System Manual [A-14]. The Management System Manual describes the relevant statutory, regulatory, contractual, and corporate frameworks within which CNL exists and operates.
	(b) will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has	CNL understands this requirement and will provide any other additional information upon request.  Compliance with Environmental Protection, Conventional Health and Safety and Nuclear Materials and Safeguards is ensured through the implantation of the CNL's



ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>General Nuclear Safety and Control Regulations</b>		
	agreed.	Environmental Protection Program [A-15], [A-16], Occupational Safety and Health Program [A-17], [A-18] and Nuclear Materials and Safeguards Management Program [A-19], [A-20] ( as per Licence Condition 11.1, 10.1, and 15.1, respectively of the DPWF LCH [A-3].
	(2) Subsection (1) does not apply in respect of an application for a licence to import or export for which the information requirements are prescribed by the Nuclear Non-Proliferation Import and Export Control Regulations, or in respect of an application for a licence to transport while in transit for which the information requirements are prescribed by the Packaging and Transport of Nuclear Substances Regulations, 2015.	CNL understands this requirement and will provide any other additional information upon request.  Compliance with Nuclear Non-Proliferation Import and Export Control Regulations and Packaging and Transport of Nuclear Substances Regulations is ensured through the implantation of the CNL's Nuclear Materials and Safeguards Management Program [A-19], [A-20] and Transportation of Dangerous Goods Program [A-11], [A-12] (as per Licence Condition 15.1 and 16.1 of the DPWF LCH [A-3].
6	An application for the amendment, revocation or replacement of a licence shall contain the following information:	CNL is applying for a licence amendment to authorize the Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of DPWF. The details of the Phase 3 Decommissioning are documented in the Program Overview DDP Volume 1 [A-4] <b>Error! Reference source not found..</b> The Phase 3 Decommissioning work will be performed in compliance with CNL's Management System framework [A-14] and Safety Control Areas (SCAs) listed in the DPWF LCH [A-3].
	(a) a description of the amendment, revocation or replacement and of the measures that will be taken and the methods and procedures that will be used to implement it;	
	(b) a statement identifying the changes in the information contained in the most recent application for the licence;	CNL's decommissioning approach and end-state for DPWF have not been changed which is eventual removal of spent fuel and of radioactive wastes/ components to licensed storage/ or disposal facilities, followed by the demolition of the buildings and structures. This decommissioning approach ensures CNL responsibly manages Canadian nuclear legacy liabilities. The details of decommissioning approach are documented in the Program Overview DDP Volume 1 [A-4]
	(c) a description of the nuclear substances, land, areas, buildings, structures, components, equipment and systems that will be affected by the amendment, revocation or replacement and of the manner in which they will be affected; and	The Program Overview DDP Volume 1 [A-4] provides information about current configuration of the DPWF.
	(d) the proposed starting date and the expected completion date of	The proposed start date for the Phase 3 Decommissioning of DPWF is 2020 and the





ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>General Nuclear Safety and Control Regulations</b>		
	any modification encompassed by the application.	proposed completion date is 2070. No change is requested for the licence expiry date (i.e., December 31, 2034).
7	An application for a licence or for the renewal, suspension in whole or in part, amendment, revocation or replacement of a licence may incorporate by reference any information that is included in a valid, expired or revoked licence.	The Clause is understood and no response is required.
15	Every applicant for a licence and every licensee shall notify the Commission of (a) the persons who have authority to act for them in their dealings with the Commission;	CNL's senior management organizational structure for the operation of all CNL sites including DPWF is documented in the Controlled List [A-21].
	(b) the names and position titles of the persons who are responsible for the management and control of the licensed activity and the nuclear substance, nuclear facility, prescribed equipment or prescribed information encompassed by the licence; and	CNL's senior management organizational structure for the operation of all CNL sites including DPWF is documented in the Controlled List [A-21].
	(c) any change in the information referred to in paragraphs (a) and (b), within 15 days after the change occurs.	CNL will comply with the 15-day notification requirement.



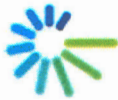
Section	Requirement	CNL Response
<b>Class I Nuclear Facilities Regulations</b>		
3	An application for a licence in respect of a Class I nuclear facility, other than a licence to abandon, shall contain the following information in addition to the information required by Section 3 of the General Nuclear Safety and Control Regulations:	The current configuration and the proposed end-state configuration of DPWF are described in the Program Overview DDP Volume 1 [A-4].
	(a) a description of the site of the activity to be licensed, including the location of any exclusion zone and any structures within that zone;	
	(b) plans showing the location, perimeter, areas, structures, and systems of the nuclear facility;	This information is provided in the Program Overview DDP Volume 1 [A-4].
	(c) evidence that the applicant is the owner of the site or has authority from the owner of the site to carry on the activity to be licensed;	Atomic Energy of Canada Limited maintains the ownership of the DPWF site and authorizes CNL to conduct licensed activities at the DPWF site [A-22].
	(d) the proposed quality assurance program for the activity to be licensed;	This requirement is covered by the CNL's Quality Assurance Manual [A-23].
	(e) the name, form, characteristics and quantity of any hazardous substances that may be on the site while the activity to be licensed is carried on;	Comprehensive information on name, form, characteristics and quantity of hazardous substances is documented in the Program Overview DDP Volume 1 [A-4] and the 2018 Annual Compliance Monitoring Report [A-13].
	(f) the proposed worker health and safety policies and procedures;	Compliance with the requirements for worker health and safety is ensured through implementation of the Occupational Safety and Health Program [[A-17], [A-18] (as per SCA "Conventional Health and Safety" Licence Condition 10.1 of the DPWF LCH [A-3]).
	(g) the proposed environmental protection policies and procedures;	CNL has programs and procedures in place to protect the environment through CNL's Environmental Protection Program [A-15], [A-16] (as per Licence Condition 11.1 of the DPWF LCH [A-3]).
	(h) the proposed effluent and environmental monitoring programs;	This information is presented in the Program Overview DDP Volume 1 [A-4].
	(i) if the application is in respect of a nuclear facility referred to in paragraph 2(b) of the Nuclear Security Regulations, the information required by Section 3 of those Regulations;	The DPWF stores Category II materials. The relevant information is provided in Program Overview DDP Volume 1 [A-4], Safety Analysis Report [A-24], and Designated Substances and Hazardous Materials Survey Report [A-25].
	(j) the proposed program to inform persons living in the vicinity of the	This requirement is covered by the implementation of CNL's Public Information





ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>Class I Nuclear Facilities Regulations</b>		
	site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the activity to be licensed; and	Program [A-26] (as per Licence Condition 1.6 of the DPWF LCH [A-3]).
	(k) the proposed plan for the decommissioning of the nuclear facility or of the site.	The proposed plans for the decommissioning of DPWF are provided in the Program Overview DDP Volume 1 [A-4].
7	An application for a licence to decommission a Class I nuclear facility shall contain the following information in addition to the information required by Section 3 of the Class I Nuclear Facilities Regulations:	CNL is applying for a licence amendment to authorize the Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of DPWF. The details of the Phase 3 Decommissioning are documented in the Program Overview DDP Volume 1 [A-4]. The Phase 3 Decommissioning work will be performed in compliance with CNL's Management System framework [A-14] and Safety Control Areas (SCAs) listed in the DPWF LCH [A-3]. The proposed start date for Phase 3 Decommissioning at DPWF is 2020 and the proposed completion date is 2070.
	(a) a description of and the proposed schedule for the decommissioning, including the proposed starting date and the expected completion date of the decommissioning and the rationale for the schedule;	
	(b) the nuclear substances, hazardous substances, land, buildings, structures, systems, and equipment that will be affected by the decommissioning;	
	(c) the proposed measures, methods and procedures for carrying on the decommissioning;	
	(d) the proposed measures to facilitate Canada's compliance with any applicable safeguards agreement;	This requirement is covered by the implementation of CNL's Nuclear Materials and Safeguards Management Program [A-19], [A-20] as per Licence Condition 15.1 of the DPWF LCH [A-3].
	(e) the nature and extent of any radioactive contamination at the nuclear facility;	This information is presented in the Program Overview DDP Volume 1 [A-4].
	(f) the effects on the environment and the health and safety of persons that may result from the decommissioning, and the measures that will be taken to prevent or mitigate those effects;	This information is provided in the Environmental Review for DPWF – Phase 3 Decommissioning [A-27].
	(g) the proposed location of points of release, the proposed maximum quantities and concentrations, and the anticipated volume and flow rate of releases of nuclear substances and hazardous	This information is provided in the Environmental Review for DPWF – Phase 3 Decommissioning [A-27].



ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>Class I Nuclear Facilities Regulations</b>		
	substances into the environment, including their physical, chemical and radiological characteristics;	
(h)	the proposed measures to control releases of nuclear substances and hazardous substances into the environment;	This information is provided in the Environmental Review for DPWF – Phase 3 Decommissioning [A-27].
(i)	the proposed measures to prevent or mitigate the effects of accidental releases of nuclear substances and hazardous substances on the environment, the health and safety of persons and the maintenance of national security, including an emergency response plan;	This information is provided in the Environmental Review for DPWF – Phase 3 Decommissioning [A-27] and CNL’s implementation of Emergency Preparedness Program [A-28], [A-29] (as per Licence Condition 12.1 of the DPWF LCH [A-3]) and Fire Protection Program [A-30], [A-31] (as per Licence Condition 12.2 of the DPWF LCH [A-3]).
(j)	the proposed qualification requirements and training program for workers; and	Compliance with the requirements for training and qualification is ensured through implementation of CNL’s Training and Development Program [A-32], [A-33] (as per Licence Condition 4.2 of the DPWF LCH [A-3]).
(k)	a description of the planned state of the site on completion of the decommissioning.	The Program Overview DDP Volume 1 [A-4] provides information about planned state of the DPWF site on completion of decommissioning.





ENVIRONMENTAL REMEDIATION MANAGEMENT

Section	Requirement	CNL Response
<b>Nuclear Security Regulations</b>		
3	An application for a licence in respect of Category I or II nuclear material, other than a licence to transport, and an application for a licence in respect of a nuclear facility referred to in paragraph 2(b) shall contain the following information in addition to the information required by section 3 of the Nuclear Substances and Radiation Devices Regulations or sections 3 to 8 of the <i>Class I Nuclear Facilities Regulations</i> , as applicable:	The DPWF stores Category II materials. The relevant information is provided in Program Overview DDP Volume 1 [A-4], Safety Analysis Report [A-24], and Designated Substances and Hazardous Materials Survey Report [A-25].
	(a) a copy of the arrangements referred to in section 35;	Douglas Point Emergency Response Service Agreement [A-34] provides details of emergency arrangements.
	(b) the site plan referred in section 16;	The description of the DPWF site plan is provided in the Program Overview DDP Volume 1 [A-4], and Safety Analysis Report [A-24].
	(c) a description of the proposed security equipment, systems and procedures;	The relevant information is given in the CNL's Security program documents [A-7], [A-8], [A-9], [A-10] and [A-34].
	(d) a description of the proposed on-site and off-site communications equipment, systems and procedures;	
	(e) a description of the proposed structure and organization of the nuclear security officer service, including the duties, responsibilities and training of nuclear security officers;	
	(f) the proposed plan and procedures to assess and respond to breaches of security; and	
	(g) the current threat and risk assessment	
16	Every licensee shall maintain a site plan that indicates the location and includes a description of the following, if applicable:	The description of the DPWF site plan is provided in the Program Overview DDP Volume 1 [A-4], and Safety Analysis Report [A-24].
	(a) the perimeter of the lands on which a high-security site is located;	
	(b) the barrier enclosing every protected area;	
	(c) the protected areas;	
	(d) the unobstructed areas that meet the requirements set out in	



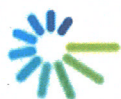
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PAGE 14 OF 16

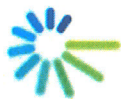
	section 10;	
	(e) the structure or barrier enclosing every inner area;	
	(f) the inner areas; and	
	(g) the vital areas.	
35	<p>(1) Every licensee shall make or cause to be made written arrangements with an off-site response force to provide for the protection of a facility at which it carries on licensed activities.</p> <p>(2) The arrangements shall include provisions:</p> <p>(a) to ensure that there is capability at all times for immediate communication among the security monitoring room, the on-site nuclear response force and the off-site response force;</p> <p>(b) to ensure that the off-site response force can support the on-site nuclear response force in making an effective intervention when requested to do so by the licensee;</p> <p>(c) for the installation of a two-way radio referred to in subparagraph 15(2)(c)(i) and an alarm device referred to in subparagraph 15(2)(c)(ii);</p> <p>(d) for annual familiarization visits to the facility by members of the off-site response force; and</p> <p>(e) for consultation between the licensee and the offsite response force regarding the arrangements, the resources and the equipment available to the licensee and the off-site response force, and any other matter relating to the security of the facility.</p>	CNL' Security Program documents [A-7], [A-8] and Douglas Point Emergency Response Service Agreement [A-34] provide details of the arrangements.
41	An application for a licence in respect of a nuclear facility shall contain, in addition to the information required by sections 3 to 8 of the <i>Class I Nuclear Facilities Regulations</i> , a description of the physical protection measures to be taken to ensure compliance with sections 42 to 48.	CNL' Security Program documents [A-7], [A-8] and Douglas Point Emergency Response Service Agreement [A-34] provide details of the arrangements.





## REFERENCES:

- [A-1] Waste Facility Decommissioning Licence for Douglas Point Waste Facility, WFDL-W4-332.02/2034, Expiry Date: 2034 December 31.
- [A-2] S.B. Kenny, Letter to H. D'Arcy, Financial Guarantee for NPD, Douglas Point and Gentilly-1 Waste Facilities, 3640-CNNO-15-0012-L, SBK-2015-49, 2015 October 01.
- [A-3] Licence Conditions Handbook, Prototype Waste Facilities – Waste Facility Decommissioning Licence, Douglas Point Waste Facility, WFDL-LCH-W4-332.02/2034, 22-508760-HBK-001, Revision 0, 2019 June 18.
- [A-4] Douglas Point Waste Facility Detailed Decommissioning Plan Volume 1: Program Overview, 22-00960-DDP-001, Revision 0, 2019 July.
- [A-5] Radiation Protection, Program Description Document, 900-508740-PDD-001, Revision 0, 2017 March.
- [A-6] Radiation Protection, Program Requirements Document, 900-508740-PRD-001, Revision 3, 2018 June.
- [A-7] Security, Program Description Document, 900-508710-PDD-001, Revision 2, 2018 November.
- [A-8] Security, Program Requirements Document, 900-508710-PRD-001, Revision 1, 2019 February.
- [A-9] Cyber Security, Program Description Document, 900-511400-PDD-001, Revision 0, 2017 January.
- [A-10] Cyber Security, Program Requirements Document, 900-511400-PRD-001, Revision 1, 2018 March.
- [A-11] Transportation of Dangerous Goods, Program Description Document, 900-508520-PDD-001, Revision 0, 2017 February.
- [A-12] Transportation of Dangerous Goods, Program Requirements Document, 900-508520-PRD-001, Revision 0, 2017 February.
- [A-13] 2018 Annual Compliance Monitoring Report for Douglas Point and Gentilly-1 Waste Facilities, 3640-00521-ACMR-2018, Revision 0, 2019 May.
- [A-14] Management System Manual, 900-514100-MAN-001, Revision 0, 2017 January.
- [A-15] Environmental Protection, Program Description Document, 900-509200-PDD-001, Revision 2, 2018 July.
- [A-16] Environmental Protection, Program Requirements Document, 900-509200-PRD-001, Revision 2, 2018 May.
- [A-17] Occupational Safety and Health, Program Description Document, 900-510400-PDD-001, Revision 2, 2018 April.
- [A-18] Occupational Safety and Health, Program Requirements Document, 900-510400-PRD-001, Revision 1, 2017 April.
- [A-19] Nuclear Materials and Safeguards Management, Program Description Document, 900-508510-PDD-001, Revision 1, 2017 February.



- [A-20] Nuclear Materials and Safeguards Management, Program Requirements Document, 900-508510-PRD-001, Revision 1, 2017 February.
- [A-21] Controlled List, Site Licences, Certificates, Permits, Facilities, & Licence Representatives, 900-514300-LST-001, Revision 7, 2019 January.
- [A-22] R.S. Walker, Letter to M. Leblanc, Atomic Energy of Canada Limited Transfer of Commission Licences to the Canadian Nuclear Laboratories Limited, and Associated Applications for Exemption from Regulations, 145-ACNO-14-0021-L, 2014 July 29.
- [A-23] Quality Assurance Manual, 900-514200-MAN-001, Revision 0, 2016 December.
- [A-24] Safety Analysis Report for the Douglas Point Waste Facility, 22-03610-SAR-001, Revision 5, 2019 July.
- [A-25] Designated Substances and Hazardous Materials Survey Final Report, 22-08960-REPT-007, Revision 0, 2018 January.
- [A-26] Public Information Program for Canadian Nuclear Laboratories (CNL), CW 513430 REPT-001, Revision 2, 2017 March.
- [A-27] Environmental Review for Douglas Point Waste Facility - Phase 3 Decommissioning, 22-03710-ENA-001, Revision 0, 2019 July.
- [A-28] Emergency Preparedness, Program Description Document, 900-508730-PDD-001, Revision 1, 2018 October.
- [A-29] Emergency Preparedness, Program Requirements Document, 900-508730-PRD-001, Revision 1, 2018 October.
- [A-30] Fire Protection, Program Description Document, 900-508720-PDD-001, Revision 2, 2018 April.
- [A-31] Fire Protection, Program Requirements Document, 900-508720-PRD-001, Revision 0, 2017 February.
- [A-32] Training and Development, Program Description Document, 900-510200-PDD-001, Revision 1, 2018 March.
- [A-33] Training and Development, Program Requirements Document, 900-510200-PRD-001, Revision 1, 2018 March.
- [A-34] Douglas Point Emergency Response Service Agreement, 22-08620-021-000-001, Revision 1, 2018 December.