

March 23, 2022

[REDACTED]

Mr. Jim Delaney
Director, Uranium and Radioactive Waste Division
Electricity Resources Branch
Natural Resources Canada
nrcan.radwastereview-examendechetsradioactifs.nrcan@canada.ca

Dear Mr. Delaney:

Bruce Power comments on Natural Resource Canada's draft
Policy for Radioactive Waste Management and Decommissioning

The purpose of this letter is to provide feedback on the draft *Policy for Radioactive Waste Management and Decommissioning*, which was released for public review on February 1, 2022. The draft was accompanied by a summary of previous feedback in *What We Heard: Modernizing Canada's Policy for Radioactive Waste Management and Decommissioning*.

Most importantly, Bruce Power fully supports and is pleased to see the acknowledgement that, "The Government of Canada recognizes the many national benefits of nuclear technology, including zero-emissions electricity, medical, industrial and research applications."

With that recognition in mind, Bruce Power urges Natural Resources Canada to consider the following before finalizing its policy:

1. Provide a more detailed explanation of what is meant by the phrase "integrated strategy for waste management and decommissioning."

While this phrase is introduced in the Background section and referenced throughout the document, Bruce Power believes more granularity is needed to fully understand what is meant by "integrated." What does it entail? Who should be involved? Who is responsible to ensure the nuclear industry will be working to clear expectations?

2. Align the radioactive waste classes as described in the Background section with the relevant CSA standards and Canadian Nuclear Safety Commission Regulatory Document.

Accordingly, including Very Low-Level Waste (VLLW) would be beneficial. For further alignment, VLLW should be defined in the CNSC's Regulatory Document.

3. Clarify how this policy applies to waste producers who are not long-term owners.

Not every organization in the nuclear industry is a waste producer and a long-term waste owner. Except for used nuclear fuel, Bruce Power owns all nuclear waste within the Bruce A and B generating stations and its other facilities until it is assumed by Ontario Power Generation for storage and disposal. Clarification is needed to understand how the policy applies where transfer of the liability for the waste takes place to a licensed third-party.

4. Strengthen policy commitment 1.8 with key points from the IAEA Technical Report Series 460 on waste minimization and optimization.

Specifically, this policy should adopt the IAEA's language that, "implementation of a waste minimization strategy is always an optimization exercise that takes into consideration factors such as worker doses, the cost of recovering materials, the availability of disposal routes for specific types of waste, the quantities of waste generated in each category, and the duration and cost of interim storage of waste compared with the estimated ultimate disposal cost."

Bruce Power appreciates the opportunity to provide its views on this important document. If you require further information or have any questions regarding this response, please contact [redacted] at [redacted] or [redacted].

Yours truly,

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[redacted contact information]