

March 28, 2022

Jim Delaney
Director, Uranium and Radioactive Waste Division
Electricity Resources Branch
Natural Resources Canada
Email: radwastereview-examendechetsradioactifs@nrcan-rncan.gc.ca

Re: Modernizing Canada's Policy for Radioactive Waste Management and Decommissioning - Small Modular Reactor Deployment

Dear Mr. Delaney,

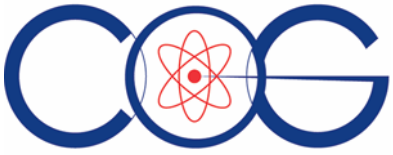
In 2020, Natural Resources Canada (NRCan) launched a process to review and modernize Canada's Radioactive Waste Policy Framework. The CANDU Owners Group (COG) Small & Medium Size Reactor Technology Forum (SMRTF), which includes representation from Bruce Power, New Brunswick Power, Ontario Power Generation, SaskPower, and Canadian Nuclear Laboratories, plays a leading role in establishing technical positions important to the development and deployment of advanced reactor technologies, including the management and eventual disposal of radioactive waste. This letter is being submitted to NRCan by the SMRTF as comments for consideration following review of the draft policy on radioactive waste and decommissioning.

The SMRTF is pleased to note that the draft policy recognizes flexibility is important to accommodate the development of novel technologies while still ensuring rigorous standards of safety and environmental protection are maintained.

The SMRTF acknowledges in paragraph 2 of the section titled "*BACKGROUND*" radioactive waste is defined as "*a gas, liquid, sludge or solid that has been declared as waste....and without foreseeable use*". The SMRTF wishes to point out that some waste items/components/materials may be declared as waste now because it is currently impractical or uneconomic to recover for reuse, but this status could change over time.

The SMRTF acknowledges the proposed federal government commitment 1.5 "*that the deployment of reprocessing technology in Canada...is subject to policy approval by the Government of Canada...*" The SMRTF supports consideration of a wide range of novel and advanced reactor technologies, including those that contemplate reprocessing of used fuel. We believe it is premature to include such a clause at this time while discussions are still on-going between industry and federal government departments.

The SMRTF wishes to point out that reprocessing can also extract fertile material (and possibly rare earth/metals) from used nuclear material and NRCan may wish to expand the wording in proposed federal government commitment 1.5 accordingly.



The SMRTF notes the following proposed commitment 2.6 and that much of this is already required as part of environmental and impact assessment processes to approve radioactive waste management and decommissioning projects: *"waste producers and owners will engage with Indigenous peoples, provinces, territories, interested communities, scientific experts and other interested persons in Canada to develop and maintain an integrated strategy for radioactive waste management and decommissioning activities that defines, reports on and sets out approaches for the long-term management, including disposal, of all of Canada's current and future radioactive wastes"*. While we acknowledge the importance and support engagement as a guiding principle, we are concerned that this wording could be misinterpreted, posing unrealistic expectations on the industry.

The SMRTF notes the proposed commitment 2.7 on waste owners and producers, and would like to know how NRCan sees this commitment providing access to disposal infrastructure for new entrants and/or small volume waste producers.

The SMRTF notes that there is no distinction made between waste producers and owners and all are attributed the same responsibilities. This could be addressed by replacing *"waste producers and owners"* with *"waste producers and/or owners (as applicable)"* throughout the policy.

The SMRTF notes the inclusion of the prohibition on importing or exporting radioactive waste for disposal in proposed commitment 3.4, which is new. The SMRTF sees this as not prohibiting repatriation of used nuclear fuel to country of origin where that is agreed as part of the supply of fuel for a novel reactor technology. The SMRTF also sees this as not prohibiting movement of wastes for commercial processing as one of the means of achieving waste minimization, whereby the volume reduced radioactive waste following processing is returned to its country of origin for storage and disposal.

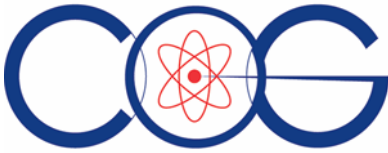
Sincerely,

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[Redacted line] CANDU Owners Group Small & Medium Size Reactor Technology Forum (SMRTF)



COG SMRTF Members:



Canadian Nuclear
Laboratories
Laboratoires Nucléaires
Canadiens



Énergie NB Power



CC:

- ██████████ Ontario Power Generation
- ██████████ Bruce Power
- ██████████ New Brunswick Power
- ██████████ New Brunswick Power
- ██████████ Canadian Nuclear Laboratories
- ██████████ SaskPower
- ██████████ CANDU Owners Group
- ██████████ CANDU Owners Group