

Comments on CNSC Discussion Paper DIS-16-03 Radioactive Waste Management and Decommissioning

To whom it may concern,

Moltex Energy has reviewed the discussion paper issued by CNSC DIS-16-03 Radioactive Waste Management and Decommissioning. In summary, we have no major modifications to recommend and believe it to be an appropriate position for Canada. The strategy of “reduce, reuse, recycle” would promote the best behaviour in waste management and matches best practice internationally.

Responses to Specific Queries:

2.1 – Waste Categories

Moltex cannot comment on the categorisation for existing Canadian activities but this classification is appropriate for the waste that is foreseen from Moltex Energy’s future activities in Canada.

2.2 – Reduce, reuse, recycle

The principle of reduce, reuse, recycle should become a regulatory requirement as long as the cost is not disproportionate to the benefit of a given waste management solution. This would ensure economic methods of managing waste will be employed when available.

2.3 – Record Keeping for Waste Management

One proposal for managing records for waste disposal sites is to give CNSC a copy of all material at a disposal facility. This would allow a duplicate to be created whilst giving the Canadian Government visibility on radioactive waste storage.

It should be a regulatory requirement for the waste owner to update the records to the latest form of commonly read storage medium. For example, all paper records should be digitised and there should be a regulatory requirement to convert from digital to another medium or location if that is the commonly used form of data storage.

2.4 – Licensing of Waste Management and Decommissioning Operations

This classification of licenses appears to be suitable. We would emphasise that the requirements to safely manage these facilities should be led by the operator/owner and always proportionate to the risks of managing these facilities. CNSC can then evaluate on a case by case basis whether the proposed strategy is appropriate. This would allow the greatest flexibility for future plants and licensees.

2.5 - Waste management program requirements

Moltex cannot comment fully as we are not yet sufficiently familiar with all of the regulatory documents relating to waste management. We would like to emphasise that we intend to deploy a simplified form of pyroprocessing of spent CANDU fuel which will result in a reduction of final waste from HLW to ILW (according to CNSC criteria) after approximately 300 years. Its volume will be reduced by approximately a factor of 100. We encourage CNSC to ensure there are no future amendments to regulations that would impose difficulty in testing or deploying this technology. It may be a cost effective way to meet the principle of “reduce, reuse, recycle”.

2.6 - Regulating remediation activities

We have no comment on this section.

2.7 - Release from licensing after decommissioning or remediation

We have no comment on this section.

Yours faithfully,

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