



November 29, 2019

Ms. Meggan Vickerd  
Director – Near Surface Disposal Facility  
Canadian Nuclear Laboratories

**Subject: CNSC Staff Completeness Check of: 2019 November – Final – Draft CNL Consolidated Responses to NSDF EIS Federal and Provincial Review Comments**

Dear Ms. Vickerd:

Thank you for your November 15, 2019 submission [1] to the Canadian Nuclear Safety Commission (CNSC) that included a revised environmental impact statement (EIS) for the proposed Near Surface Disposal Facility (NSDF) Project at Chalk River Laboratories (CRL). CNSC staff have conducted a completeness check of CNL's draft consolidated responses to the NSDF EIS federal and provincial review comments [2], to form an opinion on whether the required information has been provided to enable the federal and provincial review team to proceed with the EIS technical review, and has determined that some of the responses are incomplete.

During the completeness check, CNSC staff reviewed each IR response using the information available to provide feedback on individual dispositions. Some of the main reasons for determining incompleteness of a disposition include:

- response does not fully address the comment(s)
- response refers to entire documents rather than specific sections therein
- missing reference documentation
- no revised response provided, and unverifiable Round 1+2 dispositions

Detailed review feedback is provided in the attached table [3].

### Overall Review

In many cases “revised dispositions” are not, in fact, complete responses to the original comment, rather, they are a continuation of information or updates to the information previously provided in Dispositions Round 1 and Disposition Round 2. This means that to get a fulsome answer, one has to read 3 columns of information and follow sequential, partial dispositions meant to complement each other.

Therefore, please revise the 2019 CNL Revised Disposition column for all comments to ensure that revised dispositions collates all appropriate information into one fulsome response, including context, direct response to the original comment, and any updated references to the revised EIS or other documents. It is important to note that once accepted, the revised dispositions will be posted for dissemination to the public and therefore responses must be complete, clear and concise.

CNSC staff are requesting that CNL revise their dispositions accordingly and resubmit the federal/provincial review comment disposition table at a later date. Upon resubmission, the CNSC will perform a completeness check, taking a maximum of 15 calendar days. Should the complete package be deemed acceptable at that time, the technical review can commence.

Should you have any questions, please do not hesitate to contact me directly by phone at 613-995-7948 or by email at [Nicole.Frigault@canada.ca](mailto:Nicole.Frigault@canada.ca)

Sincerely,



Nicole Frigault  
Environmental Assessment Specialist  
Environmental Assessment Division

**c.c.:** CNSC: C. Cianci, K. Murthy, M. Gacem, N. Frigault, R. Clarke, W. Islam

CNL: P. Boyle, S. Faught, S. Karivelil, C. Williams, S. Brewer, C. Gallagher, M. Klukas, S. Cotnam, J. D. Garrick, J. McBrearty, G. Doliner, M. Gull, U. Senaratne

**References:**

- [1] Letter, M. Vickerd (CNL) to K. Murthy (CNSC), *Submission of Revised Environmental Impact Statement for the Near Surface Disposal Facility at Chalk River Laboratories*, 232-CNNO-19-0050-L, November 15, 2019 (e-Doc: 6044849)
- [2] CNL, 2019 Nov, FINAL – Draft Consolidated Responses to CNL Dispositions to NSDF EIS Federal and Provincial Review Comments (e-Doc: 6056148)
- [3] November 2019 CNSC Completeness Check of CNL Consolidated Responses to NSF EIS Federal and Provincial Comments (e-Doc: 6043776)