



December 22, 2021

Karine Glenn
Strategic Project Director
Nuclear Waste Management Organization

Re: Submissions on Canada's Integrated Strategy on Radioactive Waste

Dear Ms. Glenn,

Moltex offers this letter as part of our response to Natural Resources Canada's review and modernization of Canada's Radioactive Waste Policy and the Department's initial discussion papers on waste minimization, waste storage facilities, and waste disposal. We hope that this response also informs the Nuclear Waste Management Organization's development of an Integrated Strategy on Radioactive Waste to address gaps in low- and intermediate-level waste streams.

The principles now being established intimately concern the development of our advanced nuclear reactor in New Brunswick and potential development elsewhere in Canada.

While all of Canada's low- and intermediate-level waste is now being safely managed in interim or long-term facilities, we recognize the need for an integrated strategy to ensure that the waste continues to be managed according to international best practices over the long term.

As the Strategy will consider all phases of the nuclear fuel cycle, and not just disposal, we see it as an opportunity to evaluate and apply techniques and processes to minimize both the volume and radiotoxicity of waste. This might include the recycling of high-level waste to produce clean energy and lower-category waste streams, as well as the storage of shorter-lived waste so that it decays to a lower category prior to disposal.

In our view, the Strategy must recognize that the waste streams from advanced reactor technologies will vary much more than what the CANDU fleet produces now. So, we request that concepts being explored for the management and disposal of low- and intermediate-level waste be flexible enough to accommodate the full inventory of waste characteristics being contemplated by advanced reactor developers now and in the future.

We understand that the development of disposal capabilities for low- and intermediate-level waste will take time, necessitating the consideration of interim storage capacity for waste from new and advanced reactors.

Sincerely,

Rory O'Sullivan
Chief Executive Officer, North America
Moltex Energy