

From: PAWLOWSKI Donna M -NUCLEAR
To: "Northwatch"
Cc: [Virtue, Robyn-Lynne \[CEAA\]](#); [Deep Geologic Repository Project/ Projet de stockage de déchets radioactifs \[CEAA\ACEE\]](#)
Subject: Northwatch's Information Request
Date: January 25, 2017 3:51:14 PM

Hi Brennain:

As you know, the Canadian Environmental Assessment Agency (the Agency) is leading the review process regarding OPG's submission of additional information, including the on-going public comment process. To avoid causing confusion and an inefficient process, OPG will not be responding to inquiries that are sent to it, except to those from the Agency. As a result, please direct your inquiries to the Agency.

Regards,

Donna Pawlowski | Senior Manager, DGR Program Oversight, Nuclear Waste Management | **ONTARIO POWER**
GENERATION | 1340 Pickering Parkway, Pickering, Ontario, L1V 0C4 (P84-4) | Office: <contact information removed> | Mobile:
<contact information removed> | <email address removed>

NORTHWATCH

January 24, 2017

Donna Pawlowski, Senior Manager
DGR Program Oversight, Nuclear Waste Management
Ontario Power Generation
1340 Pickering Parkway
Pickering ON L1V 0C4

Dear Ms. Pawlowki:

**Re. OPG's 24 January Response to Northwatch Information Requests
CEAR# 2883, Additional Information Provided by Ontario Power Generation
Ontario Power Generation's Proposed Deep Geologic Repository Project**

Thank you for your email of today with the attached table with hyper-links to the references listed in the DGR submission of December 28, 2016, as posted at http://www.opg.com/generating-power/nuclear/nuclear-waste-management/Deep-Geologic-Repository/Documents/OPGDGR_PrimaryReferencesList.pdf. I have applied the list of references to our Information Request of 17 January 2014, as per the attached tracking table.

Could you please confirm or correct our assumption that the reference "MTO. 2013 Ontario Road Safety Annual Report 2013" as posted at <http://www.mto.gov.on.ca/english/publications/pdfs/ontario-road-safety-annual-report-2013.pdf> is the source for the estimates presented in Table 6-4 of the report "*Risk Estimates Conventional Accidents Study of Alternate Locations - /Main Submission 00216-REP-07701-00013*"?

The information requested is necessary to our review of the OPG filing, and to developing our analysis for submission during the public comment announced today. Could you please advise as to when we may expect responses to our outstanding information requests?

Thank you for your attention and assistance.

Sincerely,
<Original signed by>

Brennain Lloyd
Northwatch Project Coordinator

Attachment: Tracking Table 1: Northwatch Revised Information Request of January 18, 2017

cc. Honourable Catherine McKenna, Minister of Environment & Climate Change
Ms. Robyn-Lynn Virtue, Panel Manager, Canadian Environmental Assessment Agency
Mr. Rob Dobos, Environment and Climate Change Canada
Mr. Tom Hoggarth, Fisheries and Oceans
Mr. John Clark, Natural Resources Canada
Ms. Debby Leblanc, Health Canada
Ms. Caroline Ducros, Canadian Nuclear Safety Commission
Ms. Nathalie Belliveau, Transport Canada
Mr. Régent Dickey, Major Projects Management Office



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Tracking Table 1: Northwatch Information Request of January 17, 2017. Partial response received January 24, 2017

OPG Report (CEAR# 2883)	Section / Page	Context	Northwatch Information Request	Rationale	OPG Response
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 2.1.1	Discussion of Technical Feasibility of alternate locations	Provide reference document(s) or source in support of assertions regarding “international practice” of placement at depth	OPG’s very brief discussion of technical feasibility rests of a broad criteria and stated depths; the reference or sources is required to evaluate the statement	No response to date
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 6.2, page 63	Incremental Non-Transportation Project Related Costs	Provide referenced document or source for market prices for land acquisition presented in the first bullet.	A reference or source is required in order to evaluate the validity of the very wide ranging market prices cited and the seeming disparity between the two price ranges presented in the same bullet.	No response to date
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Table 6-4	Risk Estimates Conventional Accidents	Provided referenced source for risk estimates for conventional accidents	A reference or source is required in order to evaluate the validity of the stated risk estimates and to place them in context.	Reference provided: MTO. 2013 Ontario Road Safety Annual Report 2013 http://www.mto.gov.on.ca/english

					/publications/pdfs/ontario-road-safety-annual-report-2013.pdf Clarification requested of OPG
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 7.2.1	Support for OPG's DGR Project	Provide a copy of the Gandalf Group report on 2016 survey of 805 Ontarians [report listed in reference as Gandalf (Group). 2016. <i>Ontario Power Generation, Deep Geologic Repository Study</i> "]	A review of the full report may provide insight into how the report responds to the Minister's February 2016 request for additional information; the summary included in OPG's Main Submission does not.	Reference provided: Gandalf (Group). 2016. Ontario Power Generation, Deep Geologic Repository Study. http://www.opg.com/generating-power/nuclear/nuclear-waste-management/Deep-GeologicRepository/Documents/OPG-DGR_Survey-Report_May2016.pdf
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 7.2.2	DGR not a concern	Provide a copy of the untitled report of the social media analysis prepared for OPG in the fall of 2016 querying media and internet activity related, as described on pages 72-73 [report title not cited,	A review of the full report may provide insight into how the report responds to the Minister's February 2016 request for additional information; the summary included in OPG's Main Submission does not.	No response to date

			report not listed in references]		
Study of Alternate Locations - [Main Submission 00216-REP-07701-00013	Section 11	References	Provide a copy of the report listed as “IEP. 2016. <i>International Expert Panel Views on the Ontario Power Generation Response to the Request of the Canadian Minister of Environment and Climate Change for Assessment of Alternate Locations for the Deep Geologic Repository</i> ”	The Main Submission provides a very brief summary of the IEP findings (pages 83-84); a full copy of the report will provide needed context and additional detail to the summary and allow an evaluation of the basis for the IEP conclusions summarized in the OPG report.	Reference provided: IEP. 2016. International Expert Panel Views on the Ontario Power Generation Response to the Request of the Canadian Minister of Environment and Climate Change for Assessment of Alternate Locations for the Deep Geologic Repository http://www.opg.ca/generating-power/nuclear/nuclear-waste-management/Deep-GeologicRepository/Documents/International_Expert_Panel_Report_Dec2016.pdf

<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	Table 2-1	Table listing co-ordinates of the “Crystalline Alternate Location”	Provide the technical basis for selection of the locations identified by co-ordinates listed in Table 2-1.	OPG has presented two regions, each with an associated set of co-ordinates, in lieu of identifying actual alternate locations. Providing the technical basis for selection the locations identified by the several co-ordinates will assist the reviewers in evaluating the summary information provided and the relationship of the several coordinates to the described areas.	No response to date
<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	Table 2-2	Table listing co-ordinates of the “Sedimentary Alternate Location”	Provide the technical basis for selection of the locations identified by co-ordinates listed in Table 2-2.		No response to date
<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	Section 3.0 Figure 3-1	Representative area referenced in discussion of “crystalline alternative location”	Describe the relationship, if any, between the description of the “representative area” in discussed in Section 3.0 and the “Description of a Hypothetical Site” in Chapter 2.0 of the NWMO report “ <i>Adaptive Phased Management Used fuel repository conceptual design and postclosure</i> ”	Having the relationship between the two documents and their respective descriptions of “representative areas” will assist the reviewers in evaluating the information provided by OPG and assessing its validity as a substitute for a description of an actual location.	No response to date

			<i>safety assessment in crystalline rock Pre-project report NWMO TR-2012-16</i> ", December, 2012		
<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	<p>Section 4.0</p> <p>Figure 4-1</p>	<p>Representative area referenced in discussion of "sedimentary alternative location"</p>	<p>Describe the relationship, if any, between the description of the "representative area" in Section 4.0 and the "Description of a Hypothetical Site" in Chapter 2.0 of the NWMO report <i>"Adaptive Phased Management Postclosure Safety Assessment of a Used Fuel Repository in Sedimentary Rock Pre-Project Report NWMO TR-2013-07"</i>, December, 2013</p>	<p>Having the relationship between the two documents and their respective descriptions of "representative areas" will assist the reviewers in evaluating the information provided by OPG and assessing its validity as a substitute for a description of an actual location.</p>	<p>No response to date</p>

From: Northwatch
To: PAWLOWSKI Donna M -NUCLEAR
Cc: Virtue, Robyn-Lynne [CEAA]; Deep Geologic Repository Project/ Projet de stockage de déchets radioactifs [CEAA/ACEE]; Hoggarth, Tom: DFO; Leblanc, Debby: HC; Clarke, John (NRCan/RNCan); rob.dobos@canada.ca; Ducros, Caroline (CNSC/CCSN); regent.dickey@canada.ca; Belliveau, Nathalie: TC; Lise Morton
Subject: Northwatch's Information Request - Tracking Table attached; seeking clarification on two items
Date: January 24, 2017 12:56:38 PM
Attachments: [Northwatch-to-OPG Tracking-Information-Request_24January2017.pdf](#)

Thank you for your email and the list of references and associated links, Donna.

As per our attached letter, could you please:

1. Confirm or correct our assumption that the reference "MTO. 2013 Ontario Road Safety Annual Report 2013" as posted at <http://www.mto.gov.on.ca/english/publications/pdfs/ontario-road-safety-annual-report-2013.pdf> is the source for the estimates presented in Table 6-4 of the report "*Risk Estimates Conventional Accidents Study of Alternate Locations - /Main Submission 00216-REP-07701-00013*", and
2. Advise as to when we may expect responses to our outstanding information requests.

Regards,

Brennain

cc. Robyn-Lynn, Federal Team, CEAA public registry

On 2017-01-24 10:32 AM, PAWLOWSKI Donna M -NUCLEAR wrote:

Hi Brennain:

Please be advised that OPG has posted on the OPG web site (www.opg.com) a table with hyper-links to the references listed in the DGR submission of December 28, 2016. We hope you find this helpful in your review.

http://www.opg.com/generating-power/nuclear/nuclear-waste-management/Deep-Geologic-Repository/Documents/OPGDGR_PrimaryReferencesList.pdf

Cheers,

Donna Pawlowski | Senior Manager, DGR Program Oversight, Nuclear Waste Management |
ONTARIO POWER GENERATION | 1340 Pickering Parkway, Pickering, Ontario, L1V 0C4 (P84-4) |
Office: <contact information removed> | Mobile: <contact information removed> | <email address removed>

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Ontario Power Generation Inc.**

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Northwatch

www.northwatch.org

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