



Canadian Environmental
Assessment Agency

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Ottawa ON K1A 0H3

ELECTRONIC MAIL

January 19, 2017

Brennain Lloyd
Northwatch Project Coordinator
Northwatch
Box 282
North Bay, ON P1B 8H2

Dear Ms. Lloyd:

Thank you for your letter of January 16, 2017, concerning Ontario Power Generation's Deep Geologic Repository for Low and Intermediate Level Radioactive Waste Project.

On February 18, 2016, the Minister of Environment and Climate Change requested additional information and further studies from Ontario Power Generation (the proponent). The additional information was submitted by the proponent on December 30, 2016 and posted on the Canadian Environmental Assessment Registry (the registry) on January 3, 2017.

On January 18, 2017, the Canadian Environmental Assessment Agency (the Agency) began a 30-day public comment period to assist the Agency in assessing the technical sufficiency and merit of the proponent's additional information. Your letter will be considered along with submissions from the public, Indigenous groups, government departments and agencies during this comment period and posted on the registry.

Thank you for your input during the review process of the additional information for the Deep Geologic Repository Project.

Please contact me if you require further information, I can be reached at CEAA.DGR.Project-Projet.DGR.ACEE@ceaa-acee.gc.ca.

Yours sincerely,

<Original signed by>

Robyn-Lynne Virtue
Panel Manager

cc: R. Dobos, Environment and Climate Change Canada
T. Hoggarth, Fisheries and Oceans Canada
C. Ducros, Canadian Nuclear Safety Commission
N. Belliveau, Transport Canada
J. Clark, Natural Resources Canada
R. Dickey, Major Projects Management Office
D. Leblanc, Health Canada



NORTHWATCH

January 18, 2017

Ms. Robyn-Lynn Virtue, Panel Manager,
Canadian Environmental Assessment Agency

Dear Ms. Virtue:

**Re. Reformatted Information Requests with respect to CEAR# 2883
Additional Information Provided by Ontario Power Generation
Ontario Power Generation's Deep Geologic Repository Project**

Further to the 3 January 2017 posting on the Canadian Environmental Assessment Agency's public registry of the December 2016 reports by Ontario Power Generation, prepared in response to the Minister's February 2016 request for additional information with respect to Ontario Power Generation's proposed Deep Geologic Repository project, we forwarded an initial set of Information Requests to Ontario Power Generation yesterday, and provided copies to you and your Agency and the federal departments involved in the review.

Further to today's posting of a template for Information Requests we have formatted our information requests to replicate the suggested template, i.e. we have added a column to provide a rationale for each request.

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.

Thank you for your attention and assistance.

Sincerely,
<Original signed by>

Brennain Lloyd
Northwatch Project Coordinator

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

cc. Honourable Catherine McKenna, Minister of Environment & Climate Change
Ms. Lise Morton, Nuclear Waste and Decommissioning, Ontario Power Generation
Ms. Donna Pawloski, Ontario Power Generation
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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Attachment 1

Table 1: Northwatch Information Request of January 17, 2017

OPG Report (CEAR# 2883)	Section / Page	Report Section Topic	Northwatch Information Request	Rationale
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 2.1.1, Page 18	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
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.
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Table 6-4, Page 70	Risk Estimates Conventional Accidents	Provide a referenced source for risk estimates for conventional accidents. If the sources are the same as those cited on page 44 of the “ <i>Cost and Risk Estimate for Packaging and</i>	A reference or source is required in order to evaluate the validity of the stated risk estimates and to place them in context.

			<i>Transporting Waste to Alternate Locations”</i> explain the method by which the estimates in Table 6-4 were extrapolated from those sources.	
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 7.2.1, page 72	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.
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 7.2.2, page 72-73	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, report not listed in references]	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.
Study of Alternate Locations - Main Submission 00216-REP-07701-00013	Section 11, page 87	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.

<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	<p>Table 2-1, page 5</p>	<p>Table listing co-ordinates of the “Crystalline Alternate Location”</p>	<p>Provide the technical basis for selection of the locations identified by co-ordinates listed in Table 2-1.</p>	<p>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.</p>
<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	<p>Table 2-2, Page 8</p>	<p>Table listing co-ordinates of the “Sedimentary Alternate Location”</p>	<p>Provide the technical basis for selection of the locations identified by co-ordinates listed in Table 2-2.</p>	<p>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.</p>
<p>Description of Alternate Locations</p> <p>OPG CD# 00216-REP-07701-00014-R000</p>	<p>Section 3.0 Figure 3-1, Page 9-15</p>	<p>Representative area referenced in discussion of “crystalline alternative location”</p>	<p>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 safety assessment in crystalline rock Pre-project report NWMO TR-2012-16</i>”, December, 2012</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>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>Page 16-23</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>
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