

**Date:** Feb 13, 2018

**From:** Juan Pedro Unger

**To:** Lucia Abellan, Environmental Assessment Officer  
Canadian Nuclear Safety Commission

**By email:** cncs.ea-ee.ccsn@canada.ca

**Subject line:** Re: Nuclear Power Demonstration Closure Project - Reference number 80121

**CEAA Reference number:** 80121

**Comments:**

Att:

Lucia Abellan  
Environmental Assessment Officer  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario

Re: Nuclear Power Demonstration Closure Project  
Reference number: 80121

Dear Madams, Sirs,

The draft Environmental Impact Statement is an extensive document with so many shortcomings, it would be a waste of everyone's time to address them or even list them here -and it would also be repetitive, since others' submissions have already indicated and demonstrated many of the unsubstantiated, inconclusive, and at times outright unbelievable statements it contains. So the points I will stress in this submission are only three:

- 1.- The CNSC should feel insulted with the presentation of this EIS, reject it outright, and demand from whoever seeks to undertake the decommissioning of the NPD that both a credible decommissioning proposal that meets international standards and a credible EIS be submitted.
2. - Canada -and therefore the CNSC and its licencees- must adhere to the Convention on Nuclear Safety and the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, both ratified by Canada. **They must be adhered to**, and the latter Convention defines decommissioning as follows:

"decommissioning" means all steps leading to the release of a nuclear facility, other than a disposal facility, from regulatory control. These steps include the processes of decontamination and dismantling. The proposed entombment does not meet that definition. **Whether the CNSC has produced an alternative definition of decommissioning is irrelevant; these Conventions, once ratified, are not optional.**

- 3.- As explained in my submission for the proposed 10-year Chalk River licence and my presentation

before the CNSC on 25 January 2018, the companies that make up the CNL consortium include businesses widely reported to be implicated in corrupt and criminal activities. The federal Integrity Regime seems quite clear about the prohibition of the government to allow new contracts and business for companies with such a record, so the proposal at hand should be a non-starter.

Sincerely,

Juan Pedro Unger  
Ottawa, Ontario