

Date: Feb 13, 2018

From: Herbert Fitzroy

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

By email: cnscc.ea-ee.ccsn@canada.ca

Subject line: Comments on CNL's EIS for the Nuclear Power Demonstration (NPD) Closure Project at Rolphton, Ontario

CEAA Reference number: 80121

Comments:

Dear Lucia Abellan:

On behalf of my sister and friends, some of which include former Chalk River Nuclear Laboratory employees, and a current one who has been most helpful, and some who have already commented on this project, I must strongly oppose the plan to entomb the NPD reactor in Rolphton by this entity contracted to run CNL led by Mr. Mark Lesinski, who apparently cannot keep a management team together at CNL as was pointed out by Bill Turner last month in Pembroke, much less manage the financial aspects of a greatly reduced funded liability to taxpayers at Chalk River. I do not want to see a repeat in Canada of the cost overruns and the public investigations into misuse of taxpayer funds that plagued the United Kingdom Nuclear Decommissioning Authority as seen on social media where Mr. Lesinski worked for 3 years until 2013, and the negative headlines impacting the Ottawa Valley's perception as a place of outdoor fun and entertainment. Cheaper is not always best I would remind the CNSC, not when the perception of the Ottawa Valley is at stake and tour outfitters and marina operators will feel the impact of the perception that Chalk River is taking some serious gambles with these decommissioning projects, such as this plan to entomb NPD Rolphton pretty much wholesale, and other proposals now being referred to on social media as 'Dollar Store Decommissioning'.

Furthermore, most recently the executive charged with NPD decommissioning left the corporation, Mr. Pat Daley, apparently in controversy, which begs the question, who is the expert behind the license to perform this rarely performed act of entombing a large nuclear reactor site in Canada? I have no interest in standing by and watching a novel experiment in nuclear decommissioning before my eyes when there is nothing for the public to gain from it, other than to see most of the money for these projects line the pocket of Mr. Lesinski and his disappearing executives, who are clearly taking the money and running.

Before I get into some specific details about the NPD, I must say I am terrified about what I have read on blogs and listened to comments from my former neighbors, CNL employees and residents on NPD. And it is important the CNSC understands that you cannot solicit public comments on a project without allowing Canadians to express concerns about what is in the public domain regarding individuals leading a nuclear site. A nuclear site is not a typical business, and concerns about business practices and ethics are valid terrain and must be heard, even if you think they are out of scope, particularly when there is an incentive for CNL to keep the knowledge of toxicity into the environment quiet and to manipulate the facts to tell a rosy picture of what they are up to. And I must say, there are accounts of censorship on the part of the CNSC with regards to this project and others as well, which is horribly enabling and sets the table for the misuse of taxpayer money and fraud. And the fraud I am referring to is paying these

guys money to give us a bad product, a faulty product, a product that will not work for the long term. The CNSC has to shine a bright light on what CNL is up to, each and everyday.

One such blog I attach below published by the Ottawa Riverkeepers and to read it is disturbing . Furthermore as a general comment, I haven't lived in the Ottawa Valley for years , but during my recent visit this past Christmas for a 2 week stay, I would agree with many citizens that the plan to bury the NPD reactor in a stew of concrete only a few hundred meters from the Ottawa River is essentially a kick the can down the road approach to nuclear decommissioning that our grand children will have to deal with. And yes, this is important for the CNSC to consider the comments on this blog, despite the fact that this blog noted below focuses on the NSDF, as the implications of these comments are serious.

<https://www.ottawariverkeeper.ca/breaking-news-cnl-backs-down-from-proposal-to-include-intermediate-level-radioactive-waste/>

Unreported geologic 'shear zone' underneath NPD was not a topic of conversation at public information sessions.

I am also very disturbed by a conversation with a current CNL employee who has informed me that there is a serious geological issue called a 'Shear Zone' discovered under NPD that can be disrupted by a mild tremor and result in serious contamination of the Ottawa River. This shear zone is right underneath the NPD reactor building. Wikipedia says: A shear zone is a very important structural discontinuity surface in the Earth's crust and upper mantle. Mitigating potential risk to the Ottawa River doesn't seem to be on the mind of this money grubbing American management team that has gutted the laboratory complex of its long established decommissioning plans, and its tradition as a reasonably responsible steward of nuclear waste. I simply have good reasons to not trust Mr. Lesinski with Chalk River's decommissioning plans based on the chatter and the inquiries into his background. Apparently, CNL has made great efforts to not disclose or discuss the shear zone at public information sessions.

I also oppose this project for the following reasons:

Executive Leadership:

It troubles me that the turnover for CNL executives is so great it begs the question who is responsible for the licence for this project? Mr. Patrick Daley was the executive leading this project, and he is one of approximately 70 % of executives that have departed the company since it was privatized. Does Mr. Lesinski have any direct experience with entombment? Because if Mr. Daley did and he was the executive leading this project what does it tell us now that Mr. Daley is gone? It tells us that Mr. Lesinski has no subject matter expert on this project, and apparently Mr. Daley's replacement is a Canadian who was not advocating entombment before Mark Lesinski came along with his Dollar Store Decommissioning Plan, and has no experience with entombment. This is amazing to me.

Culture of Secrecy, and deception, Non Disclosure of key developments: Apparently Mr. Daley's departure was announced to CNL employees over a month ago, and yet the CNSC, nor CNL, have informed the public of this key fact. Mr. Daley was the expert who was at the information sessions on this project, he was the guy with the experience and the know-how, his name was put on all the documentation on this project. Why wasn't the public informed of this key development? There has been no statement on this development, and it bears repeating, the GM appointed to this role after Mr. Daley's departure was not advocating entombment before privatization, and has no experience at all with entombment. None whatsoever apparently. I would like a response from both CNL and the CNSC on this fact as it reveals a culture of opaqueness and secrecy.

Problem with Entombment: Entombment just below surface of radioactive materials that will be hazardous for hundreds of thousands of years and abandonment after only 100 years is in fact

unacceptable and is against International Atomic Energy Agency standards for decommissioning a reactor with a footprint of this size. As well, entombing and abandoning these same radioactive materials as well as other toxic mixed wastes within a few hundred metres of the Ottawa River, where all

surface water and groundwater drains down to that river, is completely negligent and unacceptable. There seems to be a flagrant attitude to health the environment and making a quick buck .

Potential for contamination : CNL misrepresentations are apparently becoming the norm, and its proposals for the management of radioactive waste are irresponsible and characterized by low cost as the driving rationale. CNL claims that there will be no adverse environmental effects from this site but the claim is completely fatuous and absurd. The radioactive materials that will be entombed will be hazardous to the environment and to people for hundreds of thousands of years. A friend has asked "how long does concrete last - in this country in particular? Our bridges begin decaying and collapsing in very short order and contractor or engineer and they will tell you that no concrete lasts more than 60-80 years. How can CNL assume or prove that the grouting will not crack allowing water to infiltrate this shallow underground grave. The plan is to abandon the site after 100 years - just around the time when the concrete might begin to be seriously compromised. How can CNL predict what will happen to these buried and abandoned radioactive materials over the next 500,000 years?" Their claims are absurd.

I agree with the OFWCA that the facility at Rolphton should remain as it has been for the past 30 years - under surveillance - i.e. in "deferred dismantling" until long term safe strategies for the management of nuclear waste become available and Canada commissions the building of a state-of-the-art facility for the safe storage or disposal of radioactive waste (both low-level and intermediate-level) in a location well removed from the Ottawa River. The radioactive material from Rolphton can then be finally decommissioned and the nuclear legacy liabilities at Rolphton will be safely managed.

Some quotes from fellow opposers and friends:

William Turner (ex-AECL employee) states, "there is no evidence that entombment will reduce liabilities." Mr. Turner argues that the best method is to just let it continue to decay (deferred dismantling) — no purpose for entombment.

J.R. Walker (ex-AECL employee) considers that the "proposal and its assessment lack credibility." He writes "The material contained in the proposed facility will remain hazardous for tens of thousands of years, which is far longer than the expected life of the proposed facility, its cover, and the grout."

Michael Stephens suggests that this entombment could actually increase the liabilities as entombment leaves it in a "difficult-to-retrieve" state — making it impossible to retrieve for proper disposition when an appropriate waste facility becomes available.

Entombment is also not suitable for materials that contain long-lived isotopes as these materials should not be disposed of so near the surface.

Conclusion: The CNSC has to stand up for Canadians and put the environment first in its policy decisions. They must tell Mr. Lesinski to go back to the drawing board and come up with a better plan for NPD, even if it costs more. Canadians deserve much better than a Dollar Store Decommissioning plan that lines the pockets of a multinational management team and leaves taxpayers holding the bag when

things go awry, and I believe they already have gone awry. And furthermore, let's heed Dave Tanner's wise words, "one of the first rules of Nuclear is to NEVER DO ANYTHING YOU CAN'T UNDO." I hope Mr. Lesinski is listening now.

Regards,

Herbert 'Herbie' Fitzroy,

Scarborough, Ontario

Cc;

Minister of the Environment, Catherine McKenna

Richard Cannings, Member of Parliament

Minister James Carr, NRCan