

**Date:** Feb 13, 2018

**From:** Rita Redner

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

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

**Subject line:** Comments on the EIS for the NPD closure project

**CEAA Reference number:** 80121

**Comments:**

Dear Lucia Abellan,

I do not agree with the proposed entombment at the Rolphton NPD site.

The Rolphton NPD site is located in unceded Algonquin territory, less than 400 meters from the Ottawa River, a heritage river that flows past the Houses of Parliament and provides drinking water to millions of Canadians downstream in Ontario and Quebec. The area is seismically active; the Ottawa River is a major fault line. It is a highly unsuitable location for permanent disposal of long-lived and hazardous radioactive waste.

Retired nuclear scientists are raising very serious concerns about the proposal. They note that the proposal lacks credibility, employs inadequate technology, and would result in radiation doses higher than acceptable to future Canadians, and fails to address Canada's international obligations under the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management.

According to retired nuclear scientist J.R.Walker, "NPD will remain a radiological hazard for tens of thousands of years ...It is absurd to conclude that cement grout, a reinforced concrete cap above the reactor vessel, and an engineered barrier...over the building footprint will protect the public for that period of time." According to the International Atomic Energy Agency (IAEA), "entombment" is not a decommissioning strategy.

IAEA guidance clearly states that "entombment", whereby waste is encased in concrete and grout, should only be used in exceptional circumstances (e.g., following a severe accident). Please consider alternative means such as waste storage in geological caverns in stable rock away from water bodies be examined as part of the environmental assessment.

Please ensure that Canada manage its nuclear waste responsibly in state-of-the art facilities that keep radioactive substances out of the biosphere. I urge the regulator to insist that long-lived radioactive wasters be stored in state-of-the-art facilities, well away from drinking water sources, to ensure that they are kept out of our air and doing water for as long as they remain hazardous.

Sincerely,

Rita Redner  
Perth ON