

Date: Feb 13, 2018

From: Anita Payne

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

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

Subject line: Comments on the Draft Environmental Impact Statement for the Nuclear Power Demonstration Closure Project

CEAA Reference number: 80121

Comments:

Dear Ms. Abellan

Here are my concerns about the Proposal for a Nuclear Power Demonstration Closure Project on the shore of the Ottawa River.

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). Therefore the proposed containment structure must be replaced with a structure that meets international standards or redesigned and moved to another location.

To be relatively certain that there are no environmental risks, the decommissioning plan and containment structure must be better than those that have failed in other countries. This is particularly important since some members of the coalition owning CNL have been involved in sites that have not yielded satisfactory results.

The EIS must adequately address concerns about the long-term maintenance of a concrete tomb. Cement ages and cracks. It will not necessarily last a century let alone for the thousands of years that will be required.

The EIS must address the burden on future generations arising from the abandonment of significant quantities of long-lived radionuclides and non-radioactive wastes such as lead, asbestos, PCBs and in a near-surface facility 120 meters from the Ottawa River.

The proposal must explain why storing the radioactive materials and other contaminants below ground in a geological repository is not a better, lower risk option.

This option would likely be more expensive, but it would significantly reduce the risk of contamination of bodies of water; the risk of site degradation; and damage from catastrophic events such as an earthquake.

Sincerely,

Anita Payne
Perth, ON

