

Date: Feb 13, 2018

From: Bonnechere River Watershed Project (Kathy Lindsay)

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

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

Subject line: Comment on the adequacy of the information presented in the draft EIS for NPD Closure Project

CEAA Reference number: 80121

Comments:

Attn: Lucia Abellan
Environmental Assessment Officer
Canadian Nuclear Safety Commission

Attached is our submission.

Please acknowledge receipt.

Kathy Lindsay

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Celebrating 20 years "Helping Ourselves to a Healthy Environment"

Lucia Abellan
Environmental Assessment Officer
Canadian Nuclear Safety Commission
Email: cnscc.ea-ee.ccsn@canada.ca

13 February 2018

Re: Comments on the EIS for the Nuclear Power Demonstration (NPD) Closure Project

It is our understanding that the purpose of the NPD Closure Project is the safe decommissioning of the Rolphton NPD Reactor (which was shut down in 1987 and about to become the first power reactor in Canada to be decommissioned), using an "in-situ" decommissioning approach involving grout/concrete entombment within its existing location, a few hundred metres of the Ottawa River. We are surprised and horrified by this given the Ottawa River has been designated as Canada's most recent Heritage River, is a major fault line, geologically unstable, a source of drinking water for millions of people, and the International Atomic Energy Agency does not consider entombment an acceptable decommissioning strategy, but rather to be used only in emergency situations such as a nuclear accident or an extreme weather event.

In reading submissions as of the above date, we want to endorse the submission (121579E) from the Concerned Citizens of Renfrew County and Area as a reflection of local concerns. We also endorse the many other submissions expressing concern about entombment as a viable management option for this site. In particular, Dr. J.R. Walker, a retired AECL nuclear scientist, has raised serious concerns in his submission ((121343E) about long-lived radioactive wastes being stored so close to drinking water sources, and in a seismically active area.

Given this and other concerns (outlined below), we endorse the decisions requested in the submission (114833E) by NorthWatch of the Canadian Nuclear Safety Commission as follows:

- 1) That the Project Description be revised and resubmitted, in response to the deficiencies identified by Northwatch and others [see below] who provide comment during this review period.
- 2) That the Canadian Nuclear Safety Commission give careful consideration to the respective roles of Canadian Nuclear Laboratories, Atomic Energy of Canada Limited, and Ontario Power Generation, and consider naming AECL and/or OPG as co-proponent for the project.
- 3) That the project be referred to an independent review panel for the conduct of the environmental assessment of the proposed undertaking.

We also want to express our concern about the serious issues raised in the submission (121647E) from the Algonquin Anishinabeg Nation Tribal Council (AANTC) and our support for their recommendations including the following:

1. The decades-long practice of dumping untreated contaminated water (with levels of tritium and a variety of non-radiological contaminants tens to thousands of times higher than regulatory guidelines for surface waters) from the NPD facility as “surface water releases” into the Ottawa River. We strongly agree with the recommendations from the AANTC that this practice should cease immediately and there be a full accounting and disclosure from CNL and/or CNSC about CNL’s practices regarding liquid effluent releases from other facilities along the Ottawa River including the Chalk River Laboratories.
2. That the draft EIS does not contain (or reference a document containing) the specific details of monitoring or follow up programs for downgradient groundwater quality or downstream surface water quality. We concur that “It would appear that the proponent is seeking to minimize environmental monitoring requirements and/or avoid public scrutiny of their plans for monitoring by not making them available during the public review period for the Draft EIS”. The view of the BRWP and the public is that CNL is trying to get away with doing things on the cheap and cannot be trusted to look out for the long-term safety of people and the environment. We agree with the recommendations from the AANTC that the following need further consideration/description in the Draft EIS:
 - i. Detailed groundwater and surface water quality monitoring programs need to be developed.
 - ii. How the proponent will respond in the event of significant adverse water quality monitoring results, or what monitoring results might trigger a response.
 - iii. Independent review (including public access to all monitoring information) for the NPD monitoring programs.
 - iv. There is no commitment to updating and improving the monitoring programs over time. The ongoing development of environmental monitoring technologies over the long term also needs to be planned and accounted for. A commitment from the proponent to adaptively updating the groundwater and surface water quality monitoring programs in concert with technological advances is essential, but is currently missing from the Draft EIS.
 - v. Building into the NPD Closure Project’s follow-up monitoring program a provision to subject the monitoring program to independent and proponent-funded review, and to make the full monitoring program results readily available to the public and Aboriginal communities as an excellent way to ensure the programs remain relevant and up-to-date.
 - vi. The duration of the proposed Institutional Control monitoring period (fixed at 100 years) seems arbitrary and too short. It would be more prudent and responsible for the proponent to commit to monitoring “as long as required” (and at a minimum for the desired period of at least 100 years), with no automatic termination at all. Instead, a “Check Point” report outlining the results of a full final site investigation including field studies plus a future-risk analysis should be required prior to any proposed termination of monitoring and institutional control, in order to confirm that it is safe to abandon the site. The Check Point report should be submitted for regulatory consideration, and

circulated to the public and Aboriginal groups for review and comment beforehand.

3. That the EIS (with its supporting documentation) should not be accepted or approved in its current form because it is incomplete, inconsistent, and inadequate in terms of providing a proper or adequate assessment of alternatives and the potential impacts of the proposed NPD Closure Project on down-gradient groundwater quality and downstream surface water quality.

As noted in the submission (121651E) by the Canadian Environmental Law Association, hundreds of thousands of people rely (and will continue to rely) on the surface water of the Ottawa River and the groundwater systems directly below and surrounding the NPD site for drinking water. We share their view about the need to incorporate the concept of '*rolling stewardship*' in monitoring plans with respect to transmission of information, transfer of responsibility, re-characterization of waste, mitigation of problems, retrieval of waste as appropriate, and continual adaptive management, particularly given the GoCo (Government-owned Contractor-operated) model of operation and management and that the waste in the NPD Closure Project will be radioactive for many thousands of years.

The BRWP also endorses the submission (21393E) by the Canadian Coalition for Nuclear Responsibility, in particular, the following: "The CNSC has an obligation to do everything in its power to ensure that the Canadian public is given the opportunity to learn about the nature of post-fission wastes other than irradiated nuclear fuel, and to help formulate principles that should be applied to the long-term management of such radioactive wastes. It should not be left to the private consortium of multinational corporations that own and operate CNL to decide on the basis of what is most convenient and profitable for them. There is a need for broad consultation with Canadians, including First Nations, on principles to be applied vis-a-vis the long-term management of post-fission radioactive wastes (other than irradiated nuclear fuel)."

The BRWP would like to remind and urge the CNSC, as the regulator, to insist that long-lived radioactive wastes be stored in state-of-the art facilities that meet Canada's domestic and international obligations and international standards, well away from drinking water sources, and that ensure the protection of our environment and ourselves for as long as they remain hazardous.

Thank you for the opportunity to provide these comments.

<Signature Redacted>

Kathryn Lindsay, PhD. (Wildlife Ecology)
Chair and Program Volunteer
Bonnechere River Watershed Project (Inc. 2002)

<Personal Information Redacted>

Renfrew, ON

c.c. Cheryl Gallant MP

John Yakabuski MPP

Jennifer Murphy, Warden of Renfrew County and Mayor of Eganville