

**Date:** Feb 13, 2018

**From:** Eva Schacherl

**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:**

February 13, 2018

Lucia Abellan  
Environmental Assessment Officer  
Canadian Nuclear Safety Commission

Re: Comments on the Environmental Impact Statement for the Nuclear Power Demonstration Closure Project - CEAA Reference number: 80121

Dear Ms. Abellan:

I object strongly to the in situ decommissioning plan for the Rolphton Nuclear Power Demonstration (NPD) reactor and associated structures, which are contaminated with large amounts of post-fission radioactive materials and other hazardous wastes. The site is located only 400 m from the Ottawa River, which provides drinking water to millions of Canadians.

Many Canadians do not realize that the Ottawa River is the second largest river in Eastern Canada and flows into the St. Lawrence River – the largest. The Ottawa River's watershed is over 145,000 square kilometres – larger than Switzerland, and the river system contains as much water as all of the freshwater in western Europe. Its significance to Canada cannot be overstated.

In situ decommissioning of the NPD reactor site endangers the health and safety of the Ottawa River watershed, its millions of human residents and many species. This danger will be increased by seismic events and by extreme weather events related to climate change, which may cause unprecedented, unpredictable and long-lasting flooding.

Since the Government of Canada has no comprehensive policy on the long-term management of post-fission radioactive waste materials, this proposal should be suspended indefinitely until the Government has elaborated such a policy.

In addition, because the Government of Canada on February 8, 2018 introduced legislation to significantly change environmental assessment policies and structures in Canada, the Nuclear Power Demonstration Closure Project should be approached under the new environmental assessment

framework with ample public consultation as well as consultation and negotiation with affected First Nations.

The proposal is unacceptable for many reasons, including:

1. The International Atomic Energy Agency (IAEA) clearly states that entombment is not appropriate for decommissioning and permanent shutdown.
2. The proposal does not discharge or reduce Canada's nuclear waste liabilities. It fails to safely and permanently dispose of these hazardous wastes. As a result, it will actually increase Canada's nuclear waste liabilities when this technically inadequate solution has to be remediated in the future.
3. The proposal does not meet Canada's international obligations and the requirements of the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management; among others, that it not impose predictable impacts on future generations greater than those permitted for the current generation.
4. The proposal employs inadequate technology that will expose future residents to radiation doses that exceed those that are permissible in Canada today. It therefore does not comply with the Canadian Nuclear Safety Commission's Regulatory Policy P-290, Managing Radioactive Waste [16], which states that the predicted impacts from the management of radioactive waste must be no greater than the impacts that are permissible in Canada today.

I support the recommendation of the Canadian Environmental Law Association that:

"It is recommended that the federal government conduct a strategic environmental assessment, under the proposed Bill C-69, An Act to enact the Impact Assessment Act once adopted. A strategic EA will allow Canada to develop a comprehensive and publicly informed nuclear waste management policy for all types of nuclear waste in Canada." - Submission to the CNSC on CNL's Draft Environmental Impact Statement Re: Nuclear Power Demonstration Closure Project (Ref No. 80121), February 13, 2018

Pending this strategic environmental assessment, the Nuclear Power Demonstration Closure Project should be suspended indefinitely.

Sincerely,

Eva Schacherl  
Ottawa, Ontario