

Date: Feb 13, 2018

From: Diane Beckett

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:

Lucia Abellan
Environmental Assessment Officer
Canadian Nuclear Safety Commission
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280 Slater Street
Ottawa, ON K1P 5S9

Dear Ms. Abellan,

My comments regarding the inadequacy of the draft Environmental Impact Statement are below.

Consultation and Public Awareness Inadequate and Flawed

The [draft EIS for the Nuclear Power Demonstration Project in Rolphton](#), Renfrew County, has only come to my attention today. I have been following the proposed ground-level waste storage proposal at Chalk River and thus am surprised I had not been informed of this project. I live in the Ottawa River watershed and have been concerned for many years about the management or the nuclear facilities in the Ottawa River watershed and thus follow these issues. There appears to have been very little publicity, information or outreach on this significant project. It does not appear that there have been any public meetings in Ottawa. No Ottawa media outlets have had news about this important project according to a very thorough internet search. Thus, the public have not been given the proper opportunity to provide input, concerns and questions about this project. You should be concerned that there have been so few comments on this project as it reflects poorly on how you have handled the environmental assessment process. As you know, the concerns about the waste storage has raised valid concerns and questions from many people - at hearing, through media conferences and public meetings as well as demonstrations. This project would raise equal concerns if people had been properly informed.

Entombment Flawed

The methodology does not meet international safety guidelines. The proponents are proposing decommissioning using a methodology that is not recommended by the International Atomic Energy Agency or other major nuclear energy power nations including Germany, a country with an international reputation for its sophisticated understanding of technology.

In light of this project ignoring the international standard, I can only conclude that entombment is being proposed because it is the cheapest option. As you must be well aware, that goes against all EIS standards and shows that you have used a flawed process.

That the entombment is proposed next to a major river with many cities including several Canada's largest (Ottawa and Montreal) should raise concerns with your agency. Instead you have taken an approach where you look like a lapdog to the industry. I would think that you would be blushing in embarrassment that you are so out of step with international guidelines.

Monitoring Flawed

As you are no doubt aware, nuclear products are dangerous for a quarter of a million years and more. Yet, you are only monitoring the site for 100 years, which is 1,100 years before the peak dosage of contamination is expected to occur. Do you have no concern for future generations? Is cost so important that you are willing to put our future children at risk. You have not undertaken a meaningful environmental assessment if you can propose such a shoddy approach to entombment.

Leakages Expected

You state that nuclear contaminants will be released through gradual leakages and then transported by the groundwater. So all people, animals, plants and ecosystems beyond 100 years are considered expandable by your environmental assessment! What an egocentric approach to undertake an environmental assessment with such a preposterous short time frame - that does not reflect the reality of the serious nature of the impacts of the project.

Structural Failure Expected

You state that the containment of the site is expected to start to degrade after 100 years. And conveniently for you, that is when you state the monitoring will end. I expect that you have proposed this to ensure costs are contained as no one will know that the entombment will be poisoning the environment and so no one will have to do anything to stop it.

Instability Expected

You state that there will be efforts to remediate problems that may impact the stability of the facility in the first 100 years, yet nothing will be done after that - when leakages are more likely, monitoring will have ceased and institutional memory of the issues that need to be addressed will be weaker. Once again, 100 years seems to be an arbitrary cut off to reduce responsibility and thus reduce costs. It certainly does not reflect the increase in risks that will occur over time.

Abandonment Illegal

International guidelines state that active management of nuclear waste should be undertaken - not entombment. To say that there are no adverse impacts to using an approach that is counter to best practices is ludicrous. It is well-known in the industry, that best practices of active management of nuclear waste has huge impacts. Entombment and abandonment have significantly more negative impacts than active management. You will leave a ticking time bomb for the future, one that future generations many not even realize is there. The site can never be used again. Yet you do not ensure that the entombment will last, that it will not leak and that future generations will even know the site is

there. It is as if you do not understand that this is a hazardous product and that you need to realistically and practically manage it in a safe way for current and future generations.

My History in the Ottawa Valley Exceeds 200 Years

My ancestors came to Ottawa more than 200 years ago - in the early 1800's. They had a mill on Beckett's Creek just east of Ottawa. The next generation spread out and founded Beckett's Landing near Kemptville. More than 100 years ago, my grandfather took a team of horses and drove them to what is now Algonquin Park and spent the winter logging there. I want my descendants to be able to live in the Ottawa Valley and not be poisoned by a leaking, crumbling nuclear entombment that was poorly designed, poorly managed and poorly maintained.

UNDRIP

Have you consulted with the First Nations who have lived on this land since time immemorial. Have you applied UNDRIP? Have you received their prior and informed consent - which has a legal standard to adhere to, if it is to be considered prior and informed consent.

Redo the EIS

I realize that this is a draft EIS. Thus, I trust that you will reexamine the entombment project given how much the project differs from international guidelines, let alone best practices. I trust the reexamination will result in a significant redo of the EIS - and that the redo will reflect that Canada is an OECD country and a G7 nation that respects its obligations and responsibility to the public good, now and into the future - for as many hundreds of thousands years as the project will have an impact.

I also trust that you will keep me informed of any future developments in the process.

Thank you,

Diane Beckett
Ottawa, ON