

Date: Feb 13, 2018

From: Angela Keller-Herzog

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
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Dear Ms. Abellan,

Please find my comments regarding the adequacy of information presented in the draft Environmental Impact Statement.

Consultation and Public Awareness

The [draft EIS for the Nuclear Power Demonstration Project in Rolphton](#), Renfrew County, has come to the attention of the some environmental networks only last week when a local resident in Renfrew sent a message to Ottawa's Greenspace Alliance and Riverkeeper. While there has been some awareness recently regarding the proposed ground-level waste storage at Chalk River, there is basically no awareness in our community of this proposed nuclear decommissioning upstream from us. To the best of my knowledge there have been no public meetings in Ottawa-Gatineau and the Ottawa Citizen has not carried any news of this important undertaking.

Given that the deadline for submission of comments is today, I am sending you this letter but I feel that consultation with the public has not been adequate. This is also reflected by the very few comments you have received.

Entombment methodology does not meet international safety guidelines

I am concerned that the proponents are proposing decommissioning using a methodology that is not recommended by the International Atomic Energy Agency:

"Entombment, in which all or part of the facility is encased in a structurally long lived material, is not considered a decommissioning strategy and is not an option in case of planned permanent shutdown. It

may be a solution only under exceptional circumstances (e.g. following a severe accident) for an existing facility." IAEA, Decommissioning of Facilities, Safety Requirements DS450

Similarly, in Germany which is currently engaging with the decommissioning of numerous reactors, entombment is not deemed a satisfactory option.

Clearly entombment is by far the cheapest option. But the standard for EIS is not one of least cost.

I would imagine that international experts would be even less sanguine about a proposal for an entombment right next to a major river.

100 Years Impact Criterion is not found in the Guidelines for the Preparation of an Environmental Impact Assessment

I was very astonished that the decommissioning proposal foresees that monitoring of the site discontinues after 100 years. At the same time, the peak dosage of contamination is expected to occur 1,200 years after closure of the facility (p475).

I believe that this is a most egregious problem with the decommissioning proposal EIA and in clear contravention of the Guidelines for the Preparation of an Environmental Impact Statement. NOWHERE in the guidelines does it state that any environmental impact expected in more than 100 years can be wholly and entirely dismissed.

I have learned that, "The main pathway for the release of contaminants is expected to be gradual leakage from the facility, followed by transport in groundwater in the overburden." I understand this to mean that contaminants and radiation will enter the water table, river and sources of drinking water for the downstream communities. I believe that we expect humans and animals to live in the region in more than 100 years from now. Water is life and we need to exercise responsibility for future generations.

A further irony is the following: The proposal will monitor the site during the period when the cement cap and grout can be expected to have more integrity (p. 2-24 "it is expected that the cap starts to degrade 100 years after its emplacement"), and then when this is less the case, it is proposed that CNL stop monitoring. The reverse would make more sense. We could do less monitoring in the immediate future, and in 100+ years when we expect leakage to commence, we should increase monitoring efforts.

Long term stability of the site

The assessment proposes that in the first 100 years the problems that may impact the long-term stability of the facility can be rectified. The proposal makes no provision for disruptive events after 100 years. Obviously, the longer the time-period, the greater the variance in disruption - hence again - this impact requires monitoring and events will require remediation.

Abandonment of the site

One of the disadvantages of entombment cited in the international literature is that the site cannot be reused. This is the expert understanding. For the EIA to propose that there are no adverse impacts and that the site can be abandoned without clear warning and demarcation that this is a nuclear disposal site would seem to break the most basic of principles related to the management of hazardous materials.

I look forward to future information as to the conduct of decommissioning of this nuclear site.

Angela Keller-Herzog
Resident of Ottawa