

August 16, 2017

From: Vals Osborne

To: Nicole Frigault, Environmental Assessment Specialist
Canadian Nuclear Safety Commission

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

Subject: Submission Letter to CNSC re: EIS CNL's Proposal for NSDF at Chalk River, Ontario

CEAA Reference number: 80122

To: Nicole Frigault, CNSC
Cc: The Hon. Catherine McKenna, MP, Minister of the Environment
Cc: The Honourable James Gordon Carr, MP, Minister of Natural Resources

Madame:

The Ottawa River is an extraordinary national treasure – one of the great natural, historical and cultural resources of Canada with an extremely long history as a major waterway for native peoples, an important early trade and travel route providing a link to and from the west, and one of the most important sources of lumber, furs, fish and drinking water to its local inhabitants. It remains today one of the most scenic natural resources of Canada, extending from the dam at its headwaters down through Ottawa and Montreal to the St. Lawrence seaway.

Years ago – 77 to be exact, my father first brought me here in 1940, and my younger sisters soon after, to the land of his youth, first settled by his forebears in the mid-19th century. It was still a pristine wilderness where it was not uncommon to see moose swimming its breadth. Thereafter, we came to the shores at Fort William, Quebec, every year with my father and mother. Almost every afternoon in the forties we hunted for worms in the fields or frogs in its tributary streams. Then, rowing, we ventured almost every evening to one of islands where we fished and almost always caught at least one or two for dinner, including 5-pounders, which we cooked over a camp fire. Not long after the building of the nuclear plant at Chalk River was fully completed, there was a notable shift in our catch – fishing was often disappointing and their plentiful abundance diminished significantly, often leaving us with salad for dinner. We wondered then what had caused this. It seems clear today that the Chalk River plant had had an unexplained effect on the river's ecology. And available records outline numerous radioactive incidents and leaks that have occurred there in the ensuing years. Somehow, we all acquiesced and accepted change knowing that the Chalk River plant has provided important medical benefits around the globe.

It is shocking to learn that further destruction to this great river is imminent, with far more disastrous and long-lived consequences for the millions of people who live on its banks, who depend on it for drinking water, their livelihood and their health. Solid evidence based on studies by nuclear experts, scientist, and others is mounting that the repercussions of choosing a site within a kilometer of the river's edge, to build a near-surface containment mound that has a test-life of 20 years and is considered more suitable low-level feneral waste, on seismically unstable ground, within reach of torrential floods should the dam break (which came close to occurring this year), and in an era when the frequency of microbursts and momentous storms is rapidly increasing, is a gross misjudgment. I need not repeat all

the scientific and technical information that has been published in reports and on-line in the last few months – it is there for everyone to see and growing daily!

To proceed with what must be called an “experiment” without proper guidance and oversight that has potential repercussions for thousands of years to come is irresponsible beyond words. Chalk River Laboratories was privatized in 2015. It is abundantly clear that CNL is a for-profit consortium and short-term stakeholder with a responsibility for only the next 6 to 10 years - and with a mandate from CNSC to deliver this irresponsible project as “quickly and cheaply” as possible (CNL’s own words!). Who holds the responsibility for this massive miss-judgement in the 100s and 100,000s of years thereafter?

The Canadian government must now step up to the plate and seriously address the issues of location, containment, types of deposits, which deposits and from where on behalf of the people of Canada. The current proposals do not meet the International Atomic Energy Agency’s guidelines for safe long-term disposal of radioactive waste – and it must! The independent Expert Panel’s recommendation that a new federal impact assessment authority replace CNSC as decision-maker for nuclear projects must be seriously considered and hopefully adopted. The will of the now growing well-informed citizenry must be heeded. There is no time to lose!

Respectfully,

Vals Osborne