

August 16, 2017

From: Virginia MacLatchy

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

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

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

I am very concerned about the proposed NSDF at Chalk River. It seems to put expediency and profit above the safety and health of all life that depends on the Ottawa River, including rural communities, towns and the capital city, Ottawa. I am not confident that by implementing this plan the Federal Government will have done all it could and should to protect the environment.

The CNL plan addresses the wrong objectives. The Harper government contract specifies that the plan for the storage of waste had to be cheap and fast. There was no mention of long-term guarantees of safety. How about something better than an unproven plastic-bag solution? Why isn't this disposal facility underground, surrounded by rock?

The disposal facility is in the wrong location. Built on a swamp, within a kilometre of one of Canada's most historic rivers, source of beauty, fitness, recreation, the world's best sunsets, commerce, and drinking water for millions of Canadians and tourists — and they want to build a nuclear-waste dump there? In an earthquake zone? With a string of dams up the River? And who's looking out for the Blanding's turtles? This plan is a technical and public relations disaster.

The plan depends on a technology that can be compromised in many different ways. The worst has to be the extreme likelihood that the liner is never going to outlast the long life of some of the wastes that it will be required to contain. The leachate collecting system seems to me to be an afterthought patch on a system that inevitably will leak and that will quite possibly be disturbed by burrowing critters, excessive precipitation or flooding, seismic activity, chemical deterioration, or even things no one has even thought of — which is of course why we have pipeline leaks, nuclear disasters, tank-car explosions, and other such regular events in this complicated world.

CNL's Environmental Impact Statement even admits there will be leaks! This is mind-boggling. And the EIS does not consider any effects on the River, boldly stating that the water "lies outside the boundary of the assessment." That's nonsense, absolute rubbish. Again, why are we even talking about this plan?

The plan meets no Canadian standards, because there aren't any (a travesty in itself), and does not meet internationally accepted safety standards. It doesn't even qualify as a "near-surface" facility as it is being built above the surface. The IAEA's *Safety Standards for Disposal of Radioactive Wastes* calls for a "stable geological environment" for the storage of even intermediate-level wastes (which will be in the mix), and CNL is going to put plutonium and other *high*-level wastes into this plastic container. Why has the plan made it even this far?

The contract runs for ten years and places the responsibility on a consortium of profit-seeking companies. Profit goes with nuclear disposal about as well as it does with healthcare. Drag the profit motive into the scene, and you've got a recipe for secretiveness, cost-cutting, coverups, and weasel-filled annual reports, statements, and press releases. I worked for an advertising agency; I've witnessed

examples of using half-truths or gloss to direct people to what you want them to hear. And what happens when ten years are up? Or 50 years? When the consortium is dissolved? When the crap hits the River? It's obvious, of course: It all becomes Canada's problem, and thus it's the problem for all of us as a major Canadian river becomes a disaster scene that is hundreds of kilometres in length. This is what *cheap and fast* can lead to.

If CNL had been given an unlimited budget, what would it have recommended? And how much profit would they have tacked on top of that? This is *Canada's* job, not right for a bunch of corporate types with green eyeshades who will do whatever it takes to make the numbers work.

Virginia MacLatchy
Ottawa, Ont and Bristol, Quebec