

August 16, 2017

From: Judith Lacroix

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

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

Comment on Environmental Impact Statement - Near Surface Disposal Facility

CEAA Reference number: 80122

Mrs Frigault:

Further to my discussions with many concerned citizens in Renfrew County, including Lynn Jones, JoAnn McAnn, the Ottawa River Keepers, as well several CNL employees both past and present, please accept my public comments to the Environmental Impact Statement for the NSDF. I am asking that the CNSC ask the proponent to go back to the drawing board and design a more robust engineered solution and appreciate our concerns in the Ottawa Valley and the City of Ottawa that by failing to provide adequate waste containment, this proposal flagrantly disregards the International Atomic Energy Agency's safety standard for disposal of radioactive waste and more importantly, is socially unacceptable to those who choose to live in the Ottawa Valley for years to come.

Thank you, please publish my comments below

Judith Lacroix

To: Nicole Frigault
Canadian Nuclear Safety Commission
Sent by email: August 16, 2017

cc: several concerned citizens of Renfrew County and abroad

Regarding Environmental Impact Statement - Near Surface Disposal Facility at Chalk River

Mrs Nicole Frigault, please accept my feedback on CNL's Environmental Impact Statement and my categorical rejection of this plan to build a Near Surface Disposal Facility at Chalk River on the following grounds:

1: Options to the Near Surface Disposal Facility have not been explored, which is unacceptable given the public concern over contamination of the Ottawa River. As Kurt Kehler, the Vice President of Canadian Nuclear Laboratories' decommissioning projects indicated at a recent public consultation to the Old Fort William Cottager's Association, "there is no other plan" when it comes to revitalizing the Chalk River site. That type of grooved thinking demonstrates that privatization has not brought significant benefits to the management of Chalk River Labs or the broader CNL facilities. Management should always have a backup plan, or "another plan", particularly when we are dealing with an incredible amount of toxic waste and public concern, and in point of fact, there are viable, tried and true options to dispositioning these wastes safely. This strikes me as amatuerish and irresponsible and is a basis alone for the CNSC to decline the license request for this facility. If the proponent is so interested in the revitalization of the Chalk River site which they will have no stake in after 10 years by demolishing over a 100 buildings, then the proponent should have a socially acceptable alternative plan to the NSDF so as to carry out the demolition of the site and dispose or store the waste for defined time period.

2: Cheaper is not better where nuclear wastes are concerned. As a former AECL researcher as informed me, the decommissioning estimates have gone down (in cost and scheduling) considerably since this management arrived at Chalk River and in point of fact, the EIS for the proposed NSDF walks away from the Comprehensive Preliminary Decommissioning Plan (CPDP) (CPDP-508300-PDP-001 Revision 2, March 2014) for the Chalk River Laboratories (CRL). The NSDF project departs in many significant ways from the preferred decommissioning strategy described in the CPDP. By ignoring the CPDP in its EIS for the Near Surface Disposal Facility, CNL disregards years of accumulated knowledge about CRL facilities and public health hazards. As a result, the NSDF project may not represent a technically feasible, safe and environmentally acceptable approach and may well present a number of design, operational problems and adverse environmental effects that are not addressed in the EIS. What the proponent doesn't realize is those who live downstream are not fussed about what the Government of Canada has to pay to deal with legacy wastes, they are rightly concerned about the long term health of the Ottawa river as an important body of water that serves both drinking water needs and recreational desires. If it costs more, and local inhabitants are assured their water is safer and cleaner, then Canadians will opt for the higher costs and disposition the said wastes to IAEA advice.

3: The CNSC can serve as an enabler of a low cost /high risk solution to these legacy wastes if it chooses to never decline a license application--which is a fact, the CNSC never says 'no'--and this enables the proponent to go for the lowest cost solution for the said wastes. Part of the reason there is no need for another plan as CNL's VP of Decommissioning Kurt Kehler states is because the proponent is aware that the CNSC never declines an application to license a facility, it simply rubber stamps the proponents projects as the technology platform or facility is proposed and designed. Very little questions are asked in terms of alternatives. This is an opportunity for the CNSC to put its foot down and demand a better engineered solution to deal with the wastes associated with demolishing Chalk River's facilities in a socially acceptable manner.

4: The NSDF has opposition from former employees and their views should be considered. The NSDF can leach, very imperceptibly under this massive 5 story dump and trickle into the Ottawa river which can result in serious environmental and human consequences. As well IAEA guidance on such facilities has been ignored and former decommissioning experts with deep institutional knowledge of wastes at Chalk River have decried the facility as poorly conceived and dangerous. Please see the link of the Globe and Mail article below.

<https://beta.theglobeandmail.com/news/politics/scientists-decry-plan-for-ontario-nuclear-waste-site/article35482638/?ref=http://www.theglobeandmail.com&>

5: NSDF is only 300 meters away from Waste Management Area "A" , this is where Chalk River's darkest secrets are kept, and 600 meters away from Waste Management Area "B", where more toxic wastes are stored. The proponent lacks institutional knowledge and has failed to consider how this project 'piles on' more toxicity only a short distance from Waste Management Area "A", where poor practices of past legacy waste of the past are stored, and also only approximately 600 meters from Waste Management Area "B", another trench lined area of very toxic waste. Both these areas are characterized by underground plumes of waste migrating to Perch Lake and Perch Creek. How much more waste can the environment process and handle before impacts become more severe? They may be below action levels today, but they won't when the complete decommissioning of Chalk River is undertaken and the NSDF becomes operational.

6: Plans always go wrong at Chalk River, and they will go wrong in the future, particularly by an American-led consortia that is only here for short term profit and with a record of poor performance. What is most obvious from the EIS is a complete lack of institutional history of Chalk River, well let me bring the CNSC up to speed--things always go wrong at Chalk River, they went wrong under the best of conditions, like when the corporation was flush with taxpayer cash they could spend at will, such as in 1952 , the so called biggest nuclear accident in Canada at the NRX or in 1957 and 1959, 1991 and 2007 and 2009/10 at the NRU, and dozens of incidents since including the death of a young man as a result of an explosion a number of years ago and as well, just last year, the suicide of a young engineer. Many have expressed concerns over sabotage since this incident, sabotage of nuclear facilities and sabotage of the facilities supporting the NSDF. Only several weeks ago, a family member of a deranged employee approached the Plant Road toting a gun loaded with ammunition which he waved recklessly at passersby as they drove into work in the morning.

7: A long history of denial to the public. Numerous times over the years they tried to deny low levels of tritium contamination of a river bed just downstream of the site, and a former CNL researcher has said they have willfully under reported the migration of sub grade Cesium and Strontium 90 plumes that are migrating constantly through the Perch lake stream system and to the Ottawa River. In fact, things have gone wrong a record amount of times since restructuring in 2015 to a private sector operation model, as the CNL published event reports indicate. Is the CNSC also aware that vials of Plutonium were found a number of years ago before restructuring by a military contingent reclaiming World War 2 era mustard gas and other materials stored on site? After that incident, staff at Chalk River were reminded that the poor practices of the past will pose serious issues when demolishing this site, and the new management plans to take down over 100 buildings and structures, and as the new management on the scene, they have no idea what they are heading into, not only is existing documentation poor, but materials were always left off annual reports, as such there was willful conspiracy to hide what is on site and kick the can down the road. They are in for a shock from a Radiation Protection perspective. This debris waste will all go in the NSDF, the waste acceptance criteria permits intermediate level waste, and they will sneak as much of that they can get in there, the CNSC does not stand over the corporations shoulder and make sure they don't exceed 1 percent limit. Do they?

<http://www.cnl.ca/en/home/news-and-publications/event-reports.aspx>

8: The NSDF is the "complete abdication of engineering leadership." Furthermore, the public was sold "SMAGS" which stands for Shielded Modular Above Ground Storage many years ago for low and intermediate level waste, why not continue to commission new SMAGS? This project has been described by engineers as a complete "abdication of nuclear engineering leadership." It's a nuclear dump with some well manufactured layers of separation material and liquid/gas leachate collection membranes that will perform under ideal scenario's. There is no long term RD of these membranes, these specific types of membranes have been in use for only some 20 years. So why not go back to the drawing board which includes doing what the federal government did in the past, and store the waste in above ground silos called Shielded Modular Above Ground Storage (SMAGS). They work great at Chalk River, they are in use right now as I write for Low and Intermediate Level Waste. AECL and the CNSC told us many years ago that the SMAGS were great for low and intermediate level waste, and we accepted them. The only problem with the SMAGS is they are expensive to build and operate and that would curtail profits for the new management, but there is nothing wrong with them from an engineering standpoint, they perform very well. And they are easy to monitor when things go wrong. Because as I said, things always go wrong at Chalk River, and they went wrong with the SMAGS too, but because they were above ground, the monitoring system picked up the leak. NSDF releases will be hard to detect and harder to impede.

Next Steps:

I am asking that the CNSC ask the proponent to go back to the drawing board to design a more robust engineered solution and appreciate our concerns in the Ottawa Valley and City of Ottawa that by failing to provide adequate waste containment, this proposal flagrantly disregards the International Atomic Energy Agency's safety standard for disposal of radioactive waste, and more importantly, is socially unacceptable.

Regards,

Judith Lacroix