

August 16, 2017

From: Michael McBane

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

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

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

CEAA Reference number: 80122

Nicole Frigault,
Canadian Nuclear Safety Commission
Ottawa, Canada

Dear Ms. Frigault,

The Canadian Nuclear Safety Commission can earn public trust only if its environmental assessment of the nuclear disposal project at Chalk River is comprehensive, rigorous, credible and can stand up to public and informed scrutiny.

The burden of proof for this project should be on its proponent to demonstrate safety and not on the public to demonstrate harm.

This means that assumptions about what level of risk is "acceptable" must not be the basis of your environmental assessment of this project.

The risk assessment process commonly used to assess nuclear safety has been developed by and for industry and the "experts" it employs and finances.

It is fatally flawed because it claims to establish something not supported by scientific evidence - an acceptable level of risk for nuclear radiation.

As a drinker of Ottawa River water, I am of the firm view that there is no such thing as an acceptable level of radiation in drinking water.

My conclusion, unlike the risk paradigm, is rooted in the ethical norm that human life should not be reduced to a dollar value.

Obviously the status quo is not acceptable because radiation is currently seeping into the Ottawa River.

Any proposal to fix the serious problem of current storage of radioactive materials at the Chalk River site needs to be founded on the assumption that there is no such thing as an acceptable level of radiation in drinking water.

I am therefore asking you, as the independent regulator, to base the environmental assessment of this proposal on the criterion of safety and not the assumption of "acceptable level of risk."

The risk assessment method is inappropriate, especially for nuclear technology, because the level of risk is unknown, potentially uncontrollable and catastrophic. Also, radiation in drinking water is an example of involuntary risk.

Sincerely,

Michael McBane

Cc: The Hon. Catherine McKenna, MP, Minister of the Environment

Cc: The Honourable James Gordon Carr, MP, Minister of Natural Resources