

August 16, 2017

From: John Almstedt

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

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

CNL's Proposal for Chalk River NSDF

CEAA Reference number: 80122

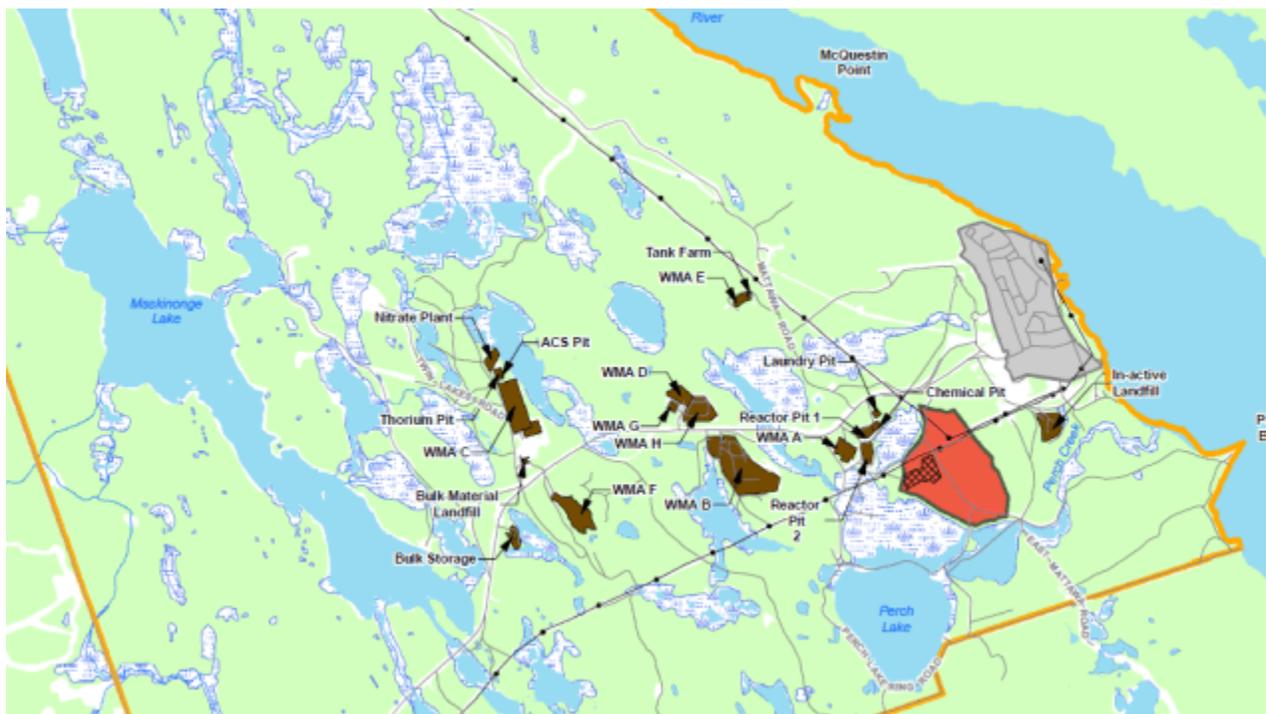
To: Nicole Frigault, CNSC

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

Dear Ms Frigault,

I'm an Ottawa resident and a founding board member of Ottawa Riverkeeper who is very much opposed to the proposed Near Surface Disposal Facility at Chalk River Laboratories as described in the Environmental Impact Statement report.

1. The first priority must be on the quality of water flowing into the Ottawa River



The map says it all, too close to the Ottawa River in case the proposed dump ever has problems and where the existing network of wetlands, streams and ponds are already highly contaminated with on-going leakage from some of the existing waste sites that are currently draining into the river. The first

priority must be on the quality of water flowing into the Ottawa River hence how to clean up of the existing problems and then finding a more secure site for the new dump.

Landscape enhancement should be of secondary importance, perhaps even leaving the buildings as a visual memorial to the past will be a good reminder for future generations.

2. A 25 meter high landfill type waste dump is inappropriate

Potential seismic activity and exposure to the elements will inevitably impact this type of dump over the next 1000 years. This type of dump will also make it very difficult to modify or repair if better solutions occur in the future. There should be a controlled packaging and monitoring of the material going into the dump as demonstrated in other countries such as Finland.

3. A new environmental assessment process is needed

Leaving the decision for the location, design and use of the Chalk River dump in the hands of a multi-national private profit oriented consortium with no political oversight is most inappropriate for a health and safety decision that will affect people and perhaps the environment over the next 1000 years. The ongoing environmental assessments of the three radioactive projects lack legitimacy: they are hampered by serious flaws in CEAA 2012 identified in the April 2017 report of the Expert Panel to review federal environmental assessment processes. CEAA 2012 does not provide early and ongoing public participation opportunities that are open to all, does not ensure that information is easily accessible and permanently and publicly available and gives the Canadian Nuclear Safety Commission sole authority to decide if a nuclear project will cause significant adverse environmental effects. This is not appropriate for a democratic country where a decision on nuclear waste will have such a long term impact and could affect the drinking water of millions of people.

Sincerely,
John Almstedt