From:	J. P. Unger <email address removed>
Sent:	Friday, July 11, 2025 1:55 PM
To:	Bruce C Nuclear Integrated Assessment / Évaluation Intégrée Bruce C Nucléaire (IAAC/AEIC)
Cc:	CEO President / PD Président (CNSC/CCSN); <contact information removed> ; <contact information removed>; <contact information removed>; <personal information removed>; news@bellmedia.ca; ontariotoday@cbc.ca; city@thestar.ca
Subject:	Comments on the draft guidelines for the Bruce C project impact assessment - JPU11JUL2025

Dear Madams, Sirs,

Please find below comments on the draft guidelines for the *Bruce C nuclear power plant project Impact Assessment,* being sent before tonight's 11:59 p.m. deadline.

The comments below include a need to present ***a number of things that seem to be absent from these impact assessment guidelines -for example, expected amounts of daily and yearly radioactive particle emissions from reactor operations, possible spread areas, expected accumulation and spread through affected food chains and cancer risks resulting from the spread and absorption*** *of Category 1 carcinogens emitted by the nuclear power plants regular operation.*

Also missing is a need for ***independently-validated estimates of possible impacts on people, wildlife, agriculture and economy of worst-case scenarios, including*** short and long term birth defects, congenital diseases and cancer risks, as well as economic damage from disruption and dislocation, ***which populated centres and/or how big a region could worst-case-scenario accidents and malfunctions render uninhabitable and/or unsuitable for food production, and for how long? (i.e., in perpetuity?****)*

Here are the specific comments:

Section 4 (Purpose, need and alternatives):

This section ***requires a clear (i.e., side by side) comparison of short and long term potential costs, health and safety risks and impacts, including*** geographic reach and duration of impact, of *worst case scenarios involving* ***the project and other energy source alternatives*****.**

Although it is understandable that the main proponent and beneficiary of the project needs to be asked for this information, there is a need for a credible, objective, fair, unbiased and reliable assessment of these aspects, including risks and costs comparisons. Therefore, *it is imperative that a thorough analysis be sought from and provided by independent sources that do not have any ties to the project or the nuclear industry*.

Sections 8 & 9 (Biophysical Environment & Health, Social and Economic Conditions):

These sections need to have strong requirements for objective description and analysis of expected radioactive emissions, *including what* ***seems to be currently missing from the requirements: the expected amounts of daily and yearly radioactive emissions from reactor operations*****,** ***minimum and maximum possible spread areas, expected accumulation and spread through affected food chains and cancer risks resulting from the spread and absorption*** *of Category 1 carcinogens that would be emitted by the nuclear power plants.*

Also missing from the current draft guidelines is a clear estimate of the requirements, including costs, specialized staff and financing for maintaining an independently-run (not dependent on the operator/potential source of contamination), *publicly accessible and verifiable surveillance and monitoring of radioactive emissions and contamination in the immediate vicinity and nearby regions that would be impacted by the regular operation emissions, accidents and malfunctions*.

An impact assessment that does not contain that information, peer-reviewed and validated by a third party not related to the proponent or the nuclear industry, would lack credibility.

Section 12 (Effects of Potential Accidents or Malfunctions)

These are some of the questions that must be answered and included for a credible impact assessment:

- What could be the impacts on people, wildlife, agriculture and economy of the worst-case scenarios (i.e., a reactor meltdown and/or reactor fire that blows or otherwise breaches the containment chambers and releases uncontrollably massive amounts of radioactive pollution?), *including short and long term birth defects, congenital diseases and cancer risks, as well as costs and duration of economic damage from disruption and dislocation*?

- *Which and how many populated centres and/or how big a region could worst-case-scenario accidents and malfunctions render uninhabitable and/or unsuitable for food production*, and for how long? (i.e., in perpetuity?)

- ***What would be the immediate and long term health costs for dealing with the health, economic and social impacts of a sudden evacuation of populated centres, rural areas and industries across impacted lands*** (i.e., compensation for losses, disruption, relocation; *short and long term health surveillance and economic and medical support needs for how big a population*, etc.)?

- What would be the *requirements and costs of ongoing 24/7/365 surveillance and monitoring, having in place and delivering an effective level of immediate emergency response to all possible accident and malfunction scenarios for potentially impacted locations and populations*, as well as the potential costs and timelines that could be needed to address, mitigate and attempt to reverse damages on impacted regions, both as a result of contamination from regular operations and of various types and levels of possible accidents, including worst-case scenarios.

Section 15 (Sustainability)

This section is missing what should be a basic requirement: *an independently-verified estimate of short, medium and long-term health, environment and security risks, as well as the costs for current*

and future generations of maintaining an effective, secure and safe containment in perpetuity of the remnants and waste resulting from the operation, decommissioning and aftermath of the reactors' expected lifespan -*and whether it is even feasible to physically and economically guarantee safe and secure monitoring and containment of resulting large amounts of highly carcinogenic materials in perpetuity*.

Thank you for the opportunity to comment. It is my hope and expectation, as a citizen, ratepayer and taxpayer that these and other independent comments are taken into account, and that our health, safety, economic and environmental sustainability are given top priority.

Sincerely,

Juan Pedro (J.P.) Unger

<Personal information removed>