

IAAC NWMO's DGR comments – Wanda Laurin, Peace River, Alberta

**Issues and concerns:**

Canada has two provinces, Ontario and New Brunswick, currently generating power using nuclear reactors. They have been producing low, medium and high level wastes for around 50 years in that time, and storing it onsite. The companies operating the reactors would probably be incredibly happy if the problem they face in dealing with the high level wastes was off their plates and onto the tax payer's. A deep geological repository is proposed and the proponents make it sound like it is a pressing and timely matter to send those wastes to this DGR. But it isn't a Canadian taxpayer problem, it is an issue for those companies – and those wastes could logically continue to languish at those power generating reactor sites.

The companies operating the nuclear reactors are managing 150 tonnes of highly radioactive wastes, which they propose to move 1,800 kilometres into the wilds of the Headwaters of Wabagoon & Turtle River & Rainy River watersheds near the communities of Ignace & Dryden for (they propose) 160 years of babysitting.

These proponents must run their plan past the IAAC agency. The IAAC says it "anticipates" (which is not a real commitment), to submit the plan to an integrated review panel. It is very concerning that the "Screening Decision" to assess whether other Federal legislation will address this will not be ADEQUATE to examine the implications of this project under other Federal legislation. The project should be examined using the Federal Environmental Impact Assessment. There must be a guaranteed, full, and thorough Impact Assessment for this controversial and risky project. The Project must be referred to an Integrated Review Panel established under Section 43 of the Federal Impact Assessment Act.

It is also VERY concerning that the transportation of 150 tons of high level radioactive waste (something that has never before been attempted in Canada), for SIXTY YEARS, is proposed to be off-the-table in the review. (The likelihood of an accident in this time is absolutely guaranteed.) The transportation of those wastes is INTEGRAL to the project, how can it be off-the-table? The DGR cannot fulfill its function without those radioactive wastes, requiring the high level radioactive waste MUST be transported to the project. The transportation of these wastes is essentially THE PROJECT.

Alternatives to this particular project exist. The site selection is one alternative. The incredible distance (1,800 kilometres) in the transportation of these very dangerous radioactive wastes needs to be re-considered. This puts too much of burden of extreme risk to Canadian communities on the proposed route (and the hundreds, if not thousands of truck drivers who are exposed to that radiation daily). For one, an alternative would be to find someplace in close proximity to where the waste is generated. There is no demonstrated **need** for this extremely risky undertaking to be done, and those risks should absolutely be avoided. There is no “public need” for this project. This radioactive waste should not a problem shouldered by Canadians; this is a problem of the companies generating that dangerous radioactive waste.

The proponent insisting on the **importance** and NEED of transporting highly radioactive waste is complete political spin. This project is not a public issue nor necessary to the public, it's an issue and a WANT of the nuclear industry. The NWMO therefore must require a full and robust environmental assessment of this project, which includes and revolves around, the transportation of high level radioactive waste. The project poses risks to all residents along the route, and anyone using the water from that watershed, as the potential to destroy those bodies of water

by a spill is a very real danger. Given the severity of the risk presented by the extreme toxicity and danger of the radioactive wastes, the location of the DGR is a problem. It is in a remote area, thousands of kilometres from the source of the high level radioactive wastes, over roads that will need maintenance to ensure there are no problems with the transportation. The proponent needs to do a serious study of a more local and logical repository of these dangerous and highly radioactive wastes so the whole issue of accidents in transport are greatly reduced.

A further concern with this proposal is that the project description vaguely or poorly outlines how it will deal with the risks to health. The proponent should do their homework and fully outline the risks to communities along the route, the impact of venting in the DGR site over time to people and the land, air and water, and the impact of transporting highly radioactive wastes to the drivers of the hauling trucks.

In the proponent's project description, the used fuel packaging plant completely lacks a real description of the plant. The unprecedented activity with extremely dangerous materials that is hardly described. The proponent must include monitoring descriptions that are much more robust. Transferring the fuel into "transportation containers" into "used fuel containers" does not describe in detail these containers.

It is quite concerning that the length of time for the monitoring of the DGR is so incredibly short, and then abandoned forever. Monitoring of the wastes, that will last a millennium, is proposed to be conducted for ONLY 160 years. This timeline of monitoring is completely inadequate. Does the government of Canada propose to allow the proponent to walk away from high level radioactive wastes then they are still highly corrosive, radioactive and dangerous when Canadians will continue to

live in this country and be impacted by those wastes? The IAAC cannot, surely, allow the proponent to abdicate its responsibility after only a century? Would it not be the duty of care to hold industry accountable for the risks associated with radioactive wastes for the millennium?

In closing, the proposed DGR is concerning on many points. The project needs to undergo a comprehensive and full Federal environmental assessment, inclusive of transportation plans, AND with much more public and Indigenous nations consultation to rigorously assess the need for this project in the location that is proposed.

Thanks for the opportunity to respond to this project.

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