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**From:** Lloyd Greenspoon <email address removed>  
**Sent:** Wednesday, February 4, 2026 2:55 PM  
**To:** Nuclear Waste / Déchets Nucléaires (IAAC/AEIC)  
**Subject:** Inadequacies in Application

February 2nd 2026

To: the nuclear waste management organization

Dear Sir/Madam;

My conclusion after reviewing the application is that it is premature to bury any radioactive waste irretrievably and that the proposal herein by the NWMO is inadequate and that the adjudication of the proposal should not proceed without a more expansive and complete overhaul of its contents including input from the broader Ontario public.

Having read some of the initial comments from citizens concerned about this proposal I agree with the objections and offer some of my own herein.

Firstly, I want to point you to the findings of the 10 year study that the FEARO assessment on high level waste set out in its report known as the Seaborn report.

I trust your panel members have read that report which was a thorough examination of the treatment of high level nuclear waste with expert and intervenor evidence and is precedent that must be considered by your panel.

The Seaborn panel made findings about AECL's proposal and they particularly found a need for a heavier focus on social, environmental, and cultural acceptance in addition to what was presented that they characterized as "examining technical feasibility".

This application does not adhere to that precedent whatsoever and needs revision to take these and many other deficiencies into account.

I am opposed to the idea that such a novel proposal for this huge undertaking be commenced without hearing from the public and believe that that omission is a flaw in the application

It is necessary for a declaration that there will be a public hearing that would follow our common law principles and be based on the rules of natural justice that we have as Canadians with full opportunity to dispute evidence and to have the right to call witnesses and present evidence relevant to this proposal.

There are many examples of lack of detail; including the omission of the half-life of the radioactive elements that are contained in the waste.

In addition there appears to be no evidence of the NWMO waste burial concept having ever been tested by actual simulations to an extent that would be required in an inquiry concerning any unproven hypothesis.

It was a further finding of the Seaborn panel that the radioactive material would be hazardous and dangerous for hundreds of thousands of years.

Radioactivity around the burial site has not been examined in detail; for example, how can the public be sure of their health and safety including warnings that can be posted around the site that will outlast the half-lives of many of the radioactive compounds buried?

The impossibility of retrieval after sealing the entrances is not a well thought out nor valid process of dealing with radioactive waste. Retrievability may turn out to be necessary for any number of reasons as monitoring and new technology may dictate.

Transportation of the spent fuel will create a significant release even if there never is an accidental spill of the waste.

Moving the waste risks tampering with the processes of moving this highly radioactive and dangerous material from the reactor site to the vehicle and then kept secure for fifty years of repeated travel over thousands of kilometres.

The site is in an area of lakes and ancient rock. It will be subject to more freezing and thawing than in the historic past and with climate change and newer weather patterns those new conditions have not been looked at by the writers of this application.

Importantly it is apparent that this proposal is being used by proponents supporting further nuclear power and its proposed proliferation in Ontario including enhanced uranium from a foreign country in an unproven technology already beginning construction in Ontario.(SMR reactors at Darlington)

That connection of new and different waste is not mentioned in this application and that deficiency is an important omission in this proposal.

The Achilles heel of nuclear power has always been the future plan of what to do with the radioactive waste and this proposal appears to be a flawed attempt at addressing waste management without presenting a verifiable and clear solution.

Lastly it should be considered in this disposal process that there is public concern with the overall radioactive waste that exists as a result of the nuclear power chain.

That chain ends at the reactor but it begins in uranium mines in northern Saskatchewan and Elliot Lake Ontario where, for example in Elliot Lake, there can be seen 200 million tons of radioactive mine tailings sitting above ground leeching into the North Channel of Lake Huron via the Serpent River.

In addition, left untreated, are the radioactive reactor structures that are extremely dangerous and which must be taken apart and all components including cement and steel broken up and buried in a

completely unstudied process for an undetermined cost that has been said to be in the billions of dollars.

The lack of finality that these wastes present must also be made known to the public so the public understands that this deep geological disposal is only the beginning of a larger project to protect our health and safety from radioactive dangers.

We are responsible for all of wastes that are here in the sacred indigenous and non-indigenous lands and waters of Ontario and this DGR project will not begin to protect the health and safety unless all of the issues of all of the radioactive waste, both present and future, is dealt with at the same time.

I believe that the entirety of this documentation of the project is far too premature to be considered by your organization and that continued on-site storage, which has not been examined in detail by the proponents, is an adequate, more reliable, and much less dangerous alternative to this proposal and will suffice in the short and medium term to ensure public health and safety.

Much deeper and more collaborative study with all participants will provide a framework for an egalitarian approach and acceptable solution.

I make these preliminary objections without limiting my right to raise other matters as time goes on and as the hearing unfolds.

Thanks for your consideration.

Yours truly,

J. Lloyd Greenspoon  
<personal information removed>