

The following are issues I would like to see addressed as the evaluation moves forward.

## 1. Need for the project.

The Nuclear Waste Management Association exists to serve the Nuclear Industry, not the public. It is in the interest of those producing the waste that the waste be removed from their ledger as soon as possible, at the lowest cost possible. The waste remains dangerous to any living creature for hundreds of thousands, if not millions of years. No alternatives have been put forward, nor the 'do nothing' case.

The suggestion is that the project will protect future generations from the cost of managing the nuclear waste produced by this generation. In fact, the cost of managing the nuclear waste has been added to the electricity bills of this generation. Future generations only inherit a cost or an obligation if the present generation does not put aside enough to manage the waste 'in perpetuity'. However, the project in fact terminates the present generation's cost (and the liability of the nuclear industry) after 160 years. The waste remains dangerous and needing managing long after 160 years. Future generations will need to pay for any 'clean up' required after 160 years. Should the project fail to adequately sequester the waste (and there is no evidence that it is 100% foolproof) there is no money or organization set aside for future generations to rely on.

The NWMO suggests there are 'decades' of research to back up their claims that it is foolproof, but does not quote any specific peer-reviewed articles to back this up. It also suggests that the globally accepted solution is deep geologic repositories. In fact no such solution exists, and repositories tried in the past have failed. The present practice of 'managing' the waste at the reactor sites has worked quite well, and and safely, for decades. It will require significantly more money to manage it in perpetuity, but that cost has, I believe, been estimated by NWMO.

## 2)

### Safety and Multiple-Barrier System

There is no peer-reviewed research submitted that supports NWMO's internal studies, for the barrier systems themselves, nor for the use of crystalline rock formations. There is no site-specific study of the groundwater travel in the fractured rock. Ontario Power Generation rejected crystalline rock for

its proposed deep geologic repository as too susceptible to water migration through unforeseen cracks in the structure.

3)

### Transportation

NWMO has deliberately left transportation of nuclear fuel out of the Initial Project Description. The suggestion is that other regulation agencies will deal with the matter. That is true of the whole project. Other agencies will be responsible for licensing, permitting, etc., but it is only the transportation that is left out. Transportation over long distances of significant quantities of spent nuclear fuel has rarely, if ever, been done in Canada. It is made necessary by the selection of this project as the 'preferred alternative'. In the 'do nothing' case, no transportation is necessary. Transportation is a key and fundamental part of this alternative, and for you not to study it will unfortunately make a mockery of the process.

Please ensure that these issues are carried forward as issues for the next phase.

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