DGR for Canada's Used Nuclear Fuel Project
Impact Assessment Agency for Canada
160 Elgin Street, 22nd floor
Ottawa, ON
K1A 0H3

February 4,2026

Subject: Comments on the Initial Project Description for the NWMO DGR.

I would like to thank the Impact Assessment Agency of Canada (IAAC) and the CNSC for allowing the public to comment on the Initial Project Description (IPD) for the proposed DGR.

I am a nuclear engineer who has worked in the Canadian nuclear industry over 40 years and I have occasionally worked on projects for the NWMO. My main comment on the IPD at this early stage of the project is the absence of a complete description of (or a reference to) a used nuclear fuel transportation program.

Transporting irradiated nuclear fuel requires a robust transportation program. I was involved in the transportation of irradiated fuel in the early 1980s when working at the Nuclear Power Demonstration plant (NPD). We were transporting irradiated fuel about once a month or two from NPD to the Chalk River Laboratories (CRL) located approximately 40 km away using a specialized cask certified by the AECB (former CNSC). The truck driver was in constant communications with staff at CRL and there was a team of qualified radiation protection responders with proper protective equipment and radiation instruments on site and on-call at CRL in case of an accident on Highway 17. Similar resources would be required in a number of strategic locations along any transportation corridor to the proposed DGR.

When working for AECL at CRL, I was involved in the emergency preparedness (EmP) program which included occasional exercises simulating transportation accidents with casualties. These exercises involved local officials and responders (ambulances, fire fighters and police forces) and were beneficial to enhance accident response and communications between emergency operating centers (EOC). A complete EmP program for the DGR would also require similar types of exercises.

A detailed transportation risk assessment (focusing on consequences) for the transportation activities to the eventual DGR would provide the necessary input to determine the exact resources needed to respond to transportation accidents and incidents whether by road or train. This would feed into the development of a training program for any first responders that would be identified along the entire transportation

corridor. As mentioned above some exercises performed with local authorities would be required to verify/confirm the response capabilities. This would help to develop and implement an effective and robust transportation program.

When reviewing my comments, the NWMO should also consider the lessons learned by the USA regarding the Yucca Mountain repository. At a 2011 waste management conference in Phoenix Arizona, a presentation titled ' Yucca Mountain Transportation Planning: Lessons Learned, 1984-2009' the presenters provided the following comments on the failed effort at Yucca mountain:

The principal lesson to be learned from the history of DOE's failed effort at Yucca Mountain is that transportation must be given equal consideration with storage and disposal, at every stage, in planning and implementing a successful national nuclear waste management program.

Thank you for considering my comments.

Jean-Pierre Létourneau, P. Eng.
Petawawa, Ontario