

Comments on NWMO's Consolidated Information on the Transportation of Used Fuel – Plain Language Summary, IAAC registry reference number 88774

Jaro Franta, 18 March 2026

Thanks to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission for inviting comments on the Initial Project Description for the Deep Geological Repository for Canada's Used Nuclear Fuel Project, proposed by the Nuclear Waste Management Organization (the NWMO), per Canadian Impact Assessment Registry reference number 88774.

On March 17 IAAC published NWMO's **Consolidated Information on the Transportation of Used Fuel – Plain Language Summary**.

<https://iaac-aeic.gc.ca/050/documents/p88774/165474E.pdf>

Among other things, it states that *“NWMO is including in the project two physical changes associated with transportation: **construction of a new Hwy 17 turn-off with accompanying access roads to the site and construction of a potential rail spur.** The NWMO is making **no other changes to highway or railway infrastructure in Canada.**”*

The problem with NWMO's idea of the "construction of a new Hwy 17 turn-off" is that it only takes into consideration the two trucks per day (plus their pilot vehicles) that will be delivering used nuclear fuel to the Revell DGR site.

NWMO is obviously trying to suppress the issue of hundreds of employees commuting daily from Ignace to the Revell DGR site – all of which will be using that "new Hwy 17 turn-off".

For literally hundreds automobiles and trucks, a cheap old "turn-off" on Hwy 17 will be a MAJOR inconvenience (if not a serious traffic hazard), UNLESS that "turn-off" is actually an overpass – at both ends (ie. Revell site AND Ignace town).



Consolidated Information on the Transportation of Used Fuel - Plain Language Summary

March 16, 2026 APM-REP-05000-0223 R000

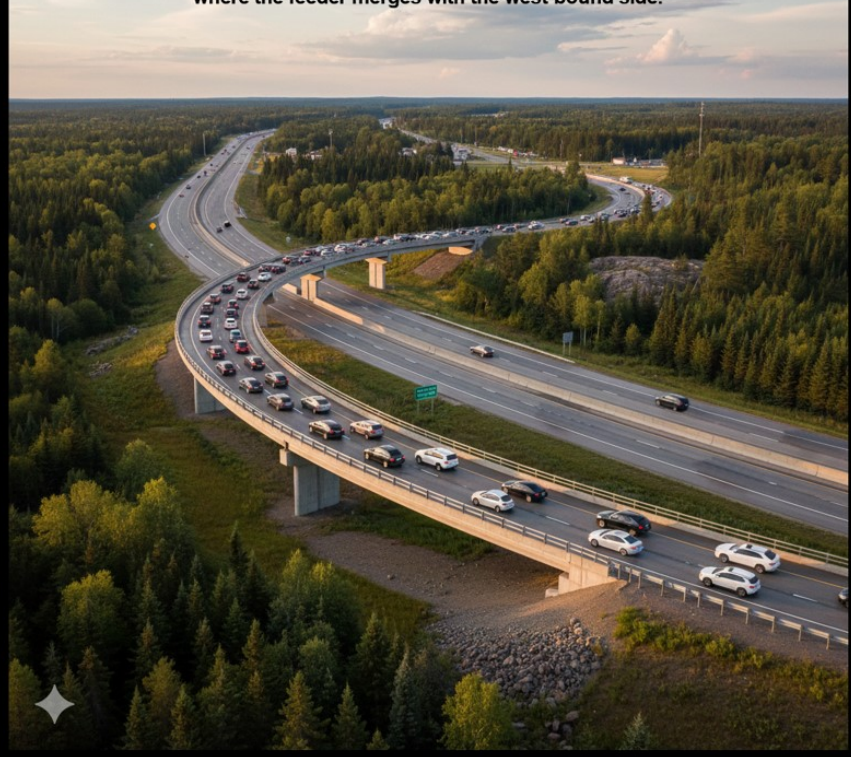
2 Including Transportation in the Impact Assessment

The Impact Assessment will assess potential effects for the area where the NWMO will be making physical changes. The NWMO is including in the project two physical changes associated with transportation: **construction of a new Hwy 17 turn-off** with accompanying access roads to the site and construction of a potential rail spur. **The NWMO is making no other changes to highway or railway infrastructure in Canada.**

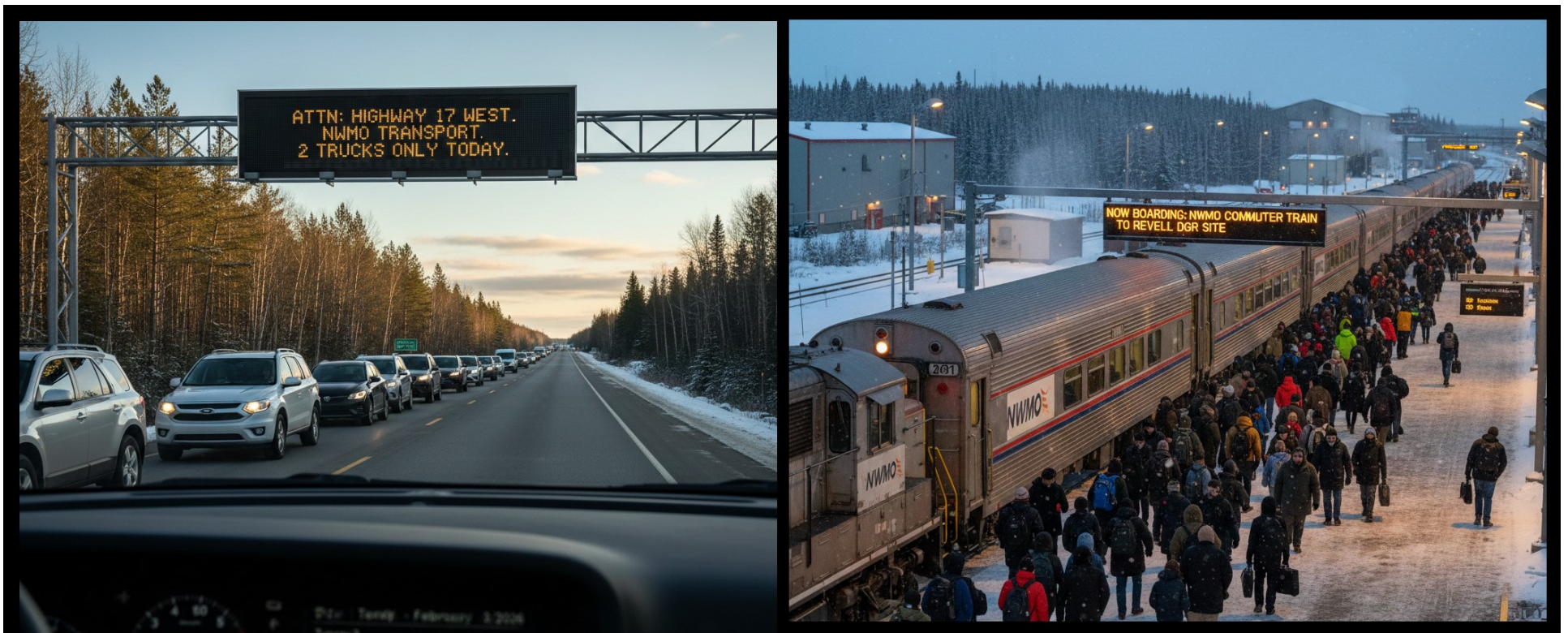
Highway 17 overpass near Ignace to allow NWMO employees on their daily commute to the Revell DGR site, to cross to the north side, where the feeder merges with the west-bound side.



Highway 17 overpass near Ignace to allow NWMO employees on their daily commute to the Revell DGR site, to cross to the north side, where the feeder merges with the west-bound side.



“No other changes to highway or railway infrastructure in Canada” (left image) versus railway commuting for NWMO employees and for nuclear waste shipments (right image):



Now, guess what's cheaper: A fancy curving highway overpass (twice!) or a simple railway bridge over Hwy 17, for both nuclear shipments and hundreds of DGR site employees?



Note also that NWMO's cost estimates document includes a short rail line for "site preparation" work ("Lifecycle Cost Estimate Update" **APM-REP-00440-0202-R000**).

This line should be extended a few kilometers north to the CP Rail main line.

SITE IMPROVEMENTS

580.40.20

Case 5.5 Million Fuel Bundles, Crystalline Scenario
 WBS Owner: A. Lee Prepared by: B. Brewer Organization: SNC-Lavalin

Description

Initial site infrastructure requirements in support of the start of construction.

Deliverables

Preparation of the site, including:

- Site civil preparation for site facilities (clearing, blasting, grading, initial landscaping)
- Main access road (inc. drainage ditches and hydro tower allowance)
- Transmission towers (25 m high, every 200 m)
- High voltage lines and grid tie-in
- Inner/outer zone site roads
- Parking Lots (Paved)
- Truck weigh scale (25 m long), scale house, and traffic lights.
- Helipad - 30 m dia., include drainage and lighting
- Allowance for internal site rail (total of 1.2 km) including switchgear
- Excavated rock management area (ERMA), including fencing, gate, access road and storm water runoff pond
- All perimeter fencing, access gates, signage, and lighting

Assumptions

Rail access to the site is not required.

Land acquisition is accounted for in other work elements.

Surface preparation is calculated for surface facilities footprint only.

All work conducted on a design-build basis, using design-build labour rates that account for typical construction indirects.

Allowance

Allowance of 25% added to reflect the level of design and uncertainties.

	2020K\$	Start Year	2033
Labour Cost	\$48,543	Finish Year	2034
Material Cost	\$68,348	Duration	2 years
Other Cost	\$50,124	WBS Type	Step Fixed
Subtotal	\$167,015		
Allowance	\$41,754		
Total Cost	\$208,769		



Anyway, regardless of what NWMO top management think of their ridiculous transportation plan, this needs to be brought up by the public at every opportunity – or people in the region will be stuck with it for many decades.

This is NOT an issue that is in the scope of CNSC licensing, and NWMO know perfectly well that it's the case, so they are taking advantage of that disconnect: **The issue needs to be addressed with the IAAC now, not when it comes to CNSC licensing.**