

Comments on IAAC's Draft Integrated Tailored Impact Statement Guidelines, ref. #166000E

Jaro Franta, 11 April 2026

Thanks to the Impact Assessment Agency of Canada and the Canadian Nuclear Safety Commission for inviting comments on the Draft Integrated Tailored Impact Statement Guidelines for the Deep Geological Repository for Canada's Used Nuclear Fuel Project, proposed by the Nuclear Waste Management Organization (the NWMO).

On April 10 IAAC published their **Draft Integrated Tailored Impact Statement Guidelines** for the Deep Geological Repository for Canada's Used Nuclear Fuel Project

<https://iaac-aeic.gc.ca/050/documents/p88774/166000E.pdf>

Among other things, it states that *"the roads and highways on which used nuclear fuel, construction materials, and personnel would travel are under municipal and provincial jurisdiction, and as a result are **not included in the impact assessment as it is outside of IAAC's mandate**. Any operations, maintenance, improvements and upgrades to the provincial highway system fall under the responsibility of the Ontario government", adding that "IAAC has coordinated with MTO [The Ontario Ministry of Transportation], and the proponent must provide a traffic impact study (TIS)."*

It also adds that *"Project-related transportation activities ... that occur within a geographic extent that includes, at a minimum, the geographic bounding encompassing the railway spur for rail transport **and Highway 17 turn-offs for road transport** (i.e., the main access corridors to the project site coinciding with new infrastructure)" do in fact fall under federal jurisdiction and therefore must be part of IAAC's assessment scope.*

Moreover, IAAC's **Summary of the Draft Integrated Guidelines** (ref. #166003E) specifies that "*strain on local and regional services and infrastructure such as emergency services and road infrastructure, traffic and safety, with particular consideration for school **transportation routes and intersections along Highway 17 between Ignace and Dryden...***".

Bizarrely, the part about the section of Highway 17 between Ignace and Dryden appears ONLY in the summary document, not in the document itself (ref. #166000E): This needs to be corrected.

In NWMO's **Consolidated Information on the Transportation of Used Fuel – Plain Language Summary**, IAAC registry reference number 88774, we find that the "*construction of a new Hwy 17 turn-off*" 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).

The necessary Hwy 17 overpasses are illustrated below:



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

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

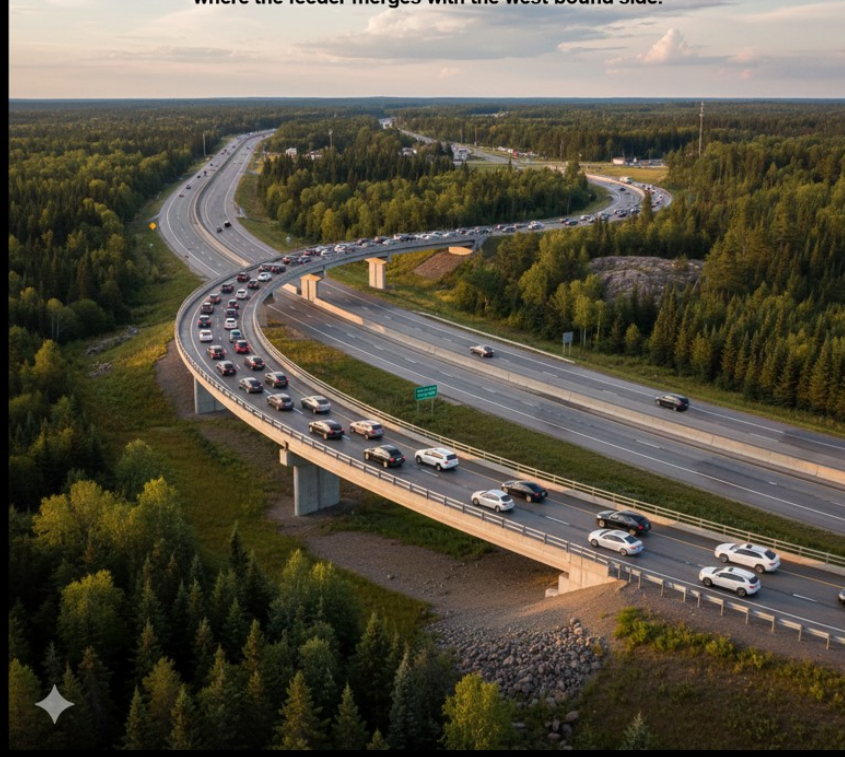
2 Including Transportation in the Impact Assessment

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.



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NWMO's **Consolidated Information on the Transportation of Used Fuel – Plain Language Summary** states that *“No other changes to highway or railway infrastructure in Canada”*.

The IMPACT of that *“no changes to highway”* plan (left image) versus railway infrastructure (right image), for literally hundreds of NWMO DGR site employees commuting daily from their homes in Ignace, is not difficult to imagine:



Less easy to imagine, as hinted in IAAC's **Draft Integrated Tailored Impact Statement Guidelines**, is the impact on things such as emergency services (medical, firefighting, etc.), school busses, and commercial transport.

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.

Now the IAAC is saying that the impact of NWMO's transportation plan are not in their scope of assessment either, except perhaps the immediate Revell DGR site turn-off from Hwy 17.

Nevertheless, the issue needs to be addressed with the IAAC and the Ontario Ministry of Transportation now, not when it comes to CNSC licensing.

At the very least, the IAAC needs to clarify how the very local impact at the immediate Revell DGR site turn-off from Hwy 17 will somehow avoid cascading down the highway, all the way to Ignace.