

**Township of Ignace**

**PEER REVIEW OF NWMO'S RESPONSE TO THE IAAC AND CNSC  
ISSUES LIST**

**APM-REP-05000-0220-R000**

**NWMO Response to Summary of Issues**

**Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project**

**22 April 2026**

**Hardy Stevenson and Associates Limited**

## **TOWNSHIP OF IGNACE PEER REVIEW ON THE NWMO RESPONSE TO THE IAAC AND CNSC SUMMARY OF ISSUES**

This next stage of the DGR peer review follows Hardy Stevenson and Associates Limited's earlier review entitled: ***Recommendations for Impact Assessment Arising from The Township of Ignace's Review of APM-REP-05000-0210-R000 Initial Project Description – Deep Geological Repository (DGR) for Canada's Used Fuel Project (Review) Submitted to the Impact Assessment Agency of Canada and Canadian Nuclear Safety Commission, February 3, 2026.*** The Township of Ignace's Review was submitted to the IAAC, CNSC and NWMO, among 900 comments from other individuals and organizations.

In support of the peer review submission, the Township of Ignace affirmed the following:

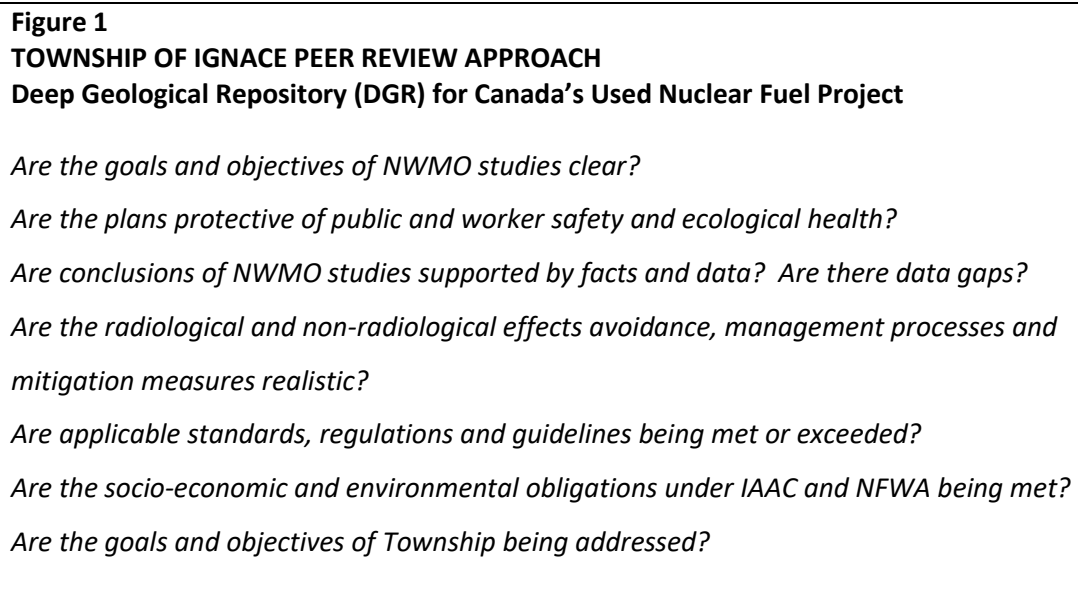
- The Township of Ignace overwhelmingly supports proceeding with the Revell Site as the preferred location for Canada's DGR. 77.3% of Ignace's voting population established a strong mandate through a very in-depth deliberative democratic process and provided overwhelming support for Council to move forward with a strong resolution of advancing the DGR project.
- The Township of Ignace recognizes the national importance of safely and permanently managing used nuclear fuel, and is committed to contributing to this generational infrastructure in a manner rooted in safety, science, and stewardship.
- The project represents a transformative opportunity for Ignace, supporting economic diversification, employment, infrastructure renewal, population stabilization, and strengthened municipal capacity. The Township is strongly supportive of ensuring that the Township is fully aligned with any and all economic activity and prosperity surrounding this multi billion-dollar project.
- The Township's support is grounded in extensive community engagement, including open houses, independent technical reviews, shared future planning, Indigenous-municipal collaboration, and consistent opportunities.

The Township of Ignace continues to affirm the above noted approach and also support Wabigoon Lake Ojibway Nation (WLON).

In alignment with this affirmation, the goal of the peer review of IAAC, CNSC and NWMO involves:

1. Identifying actions that can enhance health, socio-economic, environmental and community well being benefits for the people of the Township of Ignace,
2. Supporting NWMO in delivering a world class Deep Geologic Repository.

Our scientific and technical peer review is framed by questions identified in Figure 1:



## **WHAT STAGE OF THE REGULATORY REVIEW DOES NWMO'S RESPONSE TO IAAC AND CNSC ISSUES REPRESENT?**

The review and approval of NWMO's Deep Geologic Repository will involve the release and review of reports over many years. These reports support the Phased Licensing Approach pertaining to the graduated licensing process: site preparation, construction, operations, decommissioning and institutional control.

This peer review report provides comments at the '*issues identification*' Stage based on the IAAC's Statement of Issues (SOI) and posting the SOI on the public registry.

Township of Ignace engagement and the NWMO response to the SOI follows several steps.

- In May and June 2025, during the pre-planning phase, the Township of Ignace was engaged by the NWMO and was provided the opportunity to comment on a high-level overview of the draft Initial Project Description. NWMO presented information on the draft IPD, the integrated impact assessment and the regulatory process. Information included, the Impact Assessment Act, Tailored Guidelines, and technical regulations (*REGDOCs* and CNSC requirements). The Township of Ignace was provided several opportunities to comment. Issues noted by NWMO included radioactivity, safety, environmental impacts and social conditions.
- The DRAFT *Initial Project Description (APM-REP-05000-0210 - DRAFT)* was released on June 2, 2025 with a request for Township of Ignace and other stakeholders to comment by July 16th, 2025. A subsequent meeting was held on October 6, 2025 to discuss Ignace's IPD comments, the Ignace story and *Licensing Appendix*.
- On December 5, 2025, NWMO initiated the review and approval of the Deep Geological Repository by releasing the *Initial Project Description (APM-REP-05000-0210-R000)* and *Initial Project Description Plain Language Summary - English (APM-REP-05000-0211)*. On January 15th, 2026, NWMO presented a summary of Township of Ignace's commitment to comment as set out in the Hosting Agreement. Formal engagement obligations for both parties, including participation in regulatory reviews, technical studies, and public hearings was discussed.
- The public comment period on the *Summary of the Initial Project Description* extended from January 5 to February 4, 2026. The IAAC received input from federal and provincial authorities, Indigenous Nations and communities and organizations and the public. On February 16, 2026, IAAC summarized the key issues raised in the Summary of Issues (SOI) thus providing a succinct description. IAAC expected NWMO to review all submissions on the Canadian Impact Assessment Registry Internet site (the Registry) for the project (Reference Number #88774), including the submission of the Township of Ignace.
- On March 12, 2026 NWMO issued their response to the Summary of Issues (Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project, *Response to Summary of Issues, March 2026 APM-REP-05000-0220-R000*). A few days later in March, NWMO issued the report, *Consolidated Information on the Transportation of Used Fuel - Plain Language Summary - March 16, 2026, (APM-REP-05000-0223 R000)*.
- On March 23, 2026, IAAC decided that further assessment is required and posted a Notice of early decision with reasons. It determined that the designated DGR project may cause

adverse effects within the federal jurisdiction or direct or incidental adverse effects, including effects on the environment or to health, social or economic conditions. As per the requirements of *Section 43* of the *Impact Assessment Act*, the Minister must refer project regulated under the Nuclear Fuel Waste Act (NFWA) Act to a review panel.

NWMO's March 12<sup>th</sup> 2026 response to the SOI supports IAAC decision-making on whether an impact assessment is required under *Section 16* of the *Impact Assessment Act*. As stated by IAAC, if an impact assessment is required, the key issues and the proponent's response will inform the scope of the impact assessment, and the continued development and finalization of the *Integrated Tailored Impact Statement Guidelines* (Integrated Guidelines and TISG) and plans, as appropriate.

Key IAAC issues include:

**Physical and Biological Environment**

Geology, geochemistry, and geological hazards  
Radiological Conditions  
Groundwater and Surface Water  
Terrestrial, riparian and wetland environments  
Terrestrial Wildlife and their Habitat  
Species at risk and their habitat  
Fish and Fish Habitat  
Birds (Including Migratory Birds) and Their Habitat

**Health, Social, and Economic Conditions**

Human Health and Well-Being:  
Psychosocial health impacts:  
Infrastructure and Services:  
Socio-Economic Conditions:

**Other Key Issues Related to the Federal Undertaking**

Project description, purpose, need and alternatives considered  
Accidents and Malfunctions  
Transportation  
Effects of the environment on the project  
Cumulative Effects

**Indigenous Peoples**

Indigenous engagement  
Physical and cultural heritage  
Current use of lands and resources  
Health, social and economic conditions  
Rights of Indigenous Peoples

**Annex A: Additional Comments, Guidance and Recommendations**

**Annex B: Submissions from Indigenous Nations and Communities**

Through this report, the Township of Ignace provides information and analysis, via its peer review consultants, on how NWMO has responded to the *Statement of Issues*. Matters of concern include: Are there changes to the Initial Project Description arising from NWMO's response to the SOI? What are the implications of NWMO's response for the Township of

Ignace? Have the Township of Ignace's earlier recommendations been addressed? What next steps should the Township of Ignace be taking to achieve its goals? Please note, we do not comment on issues pertaining to Indigenous communities as this is out of scope.

## **ANALYSIS: WHAT DO WE LEARN FROM NWMO'S RESPONSE TO THE LIST OF IAAC AND CNSC ISSUES?**

NWMO specifically responds to each of the issues and sub-issues listed in the SOI. Using a tabular format each of the issues are addressed. In some instances, the NWMO refers to existing reports it has completed and in others it makes a commitment to address the issue raised. The issues raised by the IAAC and CNSC are addressed separately, however, areas of overlap are cited. NWMO's response, at times, is detailed. At other times the response defers to later phases, for example, indicating that the issue will be addressed through compliance with applicable law or within the forthcoming *Impact Statement*.

Considering the high-level grouping of comments by IAAC, the NWMO responses do not directly address some of the Ignace Peer Review Team (IPRT) comments. For example, tunnel boring machines are not mentioned in the Summary of Issues and the Responses documents.

We are unable to find the Licensing Appendix (cited earlier) developed by NWMO in support of engagement with the Township of Ignace. It listed ongoing and future studies both central to the Impact Assessment and Licensing and, studies that would not be central, but would be informative. The Licensing Appendix was particularly helpful to inform the Township of Ignace and will continue to be so.

We note that while transportation is not part of the Initial Project Description, 619 pages of the 767-page NWMO response or 80 percent of the report response is dedicated to transportation. The information provided is technically sound and provides assurances that used fuel transportation can be delivered safely. While we have additional comments to share, we conclude that the information addresses transportation comments raised by Ignace residents.

Specific comments on NWMO's response are listed below.

## **NWMO RESPONSE TO ISSUES IMPORTANT TO THE TOWNSHIP OF IGNACE**

The Township of Ignace submitted several recommendations to the IAAC and CNSC concerning the scope of the Impact Assessment Process. In response to the Summary of Issues, NWMO has addressed certain recommendations directly, while others have been deferred for consideration during the Impact Statement Phase.

With regards to maximizing Ignace socio-economic benefits and improving health outcomes, the NWMO's response suggests adhering to the NFWA approach to socio-economic issues instead of employing an integrated impact assessment process. The NWMO contends that focusing solely on the impact assessment of socio-economic issues may result in conflicting requirements for mitigation measures. To address this, the NWMO plans to develop a social, cultural, and economic reporting framework. This framework will include measures and topics, along with related qualitative and quantitative indicators, to enable continuous assessment of both positive contributions and negative impacts on the community's way of life, priorities, and aspirations over multiple years. Ongoing community input will be incorporated into the economic reporting framework, ensuring sustained engagement in monitoring and managing socio-economic effects. This framework is to enhance project implementation and the effectiveness of associated mitigation measures.

The IAAC's SOI and the NWMO's response regarding health, social and economic conditions, such as community and social well-being, economic opportunities and impacts, and distribution of benefits and burdens, are primarily focused on Indigenous Nations and communities. We hoped for a broader consideration of issues involving Ignace as the host community and other local Northwestern Ontario communities, such as Dryden.

Several recommendations related to project design and specific elements descriptions have yet to be fully addressed by NWMO. For instance, the IAAC raised concerns about the limited consideration of alternative approaches for various project activities and components, including ramps and options for vertical shafts, the used fuel processing plant, used fuel containers, and the storage of intermediate and low-level waste. NWMO indicates that the alternatives described in the IDP will be evaluated during the Impact Statement phase, with further engagement from Indigenous Nations and communities to refine the list of options for each proposed alternative means to be assessed. However, there is currently no reference to engagement on these matters with non-Indigenous communities, such as the Township of Ignace.

Additionally, NWMO has not specified how used fuel would be transported within the site (shafts vs ramps) nor provided details on whether dynamite or tunnel boring machines would be employed. No information has been disclosed regarding the purpose or design of the rail spur. These technical aspects remain deferred to subsequent project stages.

Outstanding issues include:

- Delineating boundaries on the conceptual site plan, including figures illustrating on-site "trigger" and "action level" boundaries and corresponding effect assessments;

- Adding a section on occupational health and safety, along with the assessment of related effects; Including health and safety risks and risk avoidance measures, specifically describing potential accident scenarios associated with on-site risks (such as shafts and fires involving battery-powered vehicles);
- NWMO's response to the Township of Ignace's comments on nuclear safety culture are discussed in the next section.

## **ANALYSIS OF NWMO'S RESPONSE TO IAAC AND CNSC**

### **OFF-SITE PATHWAYS**

Several Sections of the NWMO response refer to pathways of effects that need to be discussed with Indigenous peoples. For example, NWMO-RSOI-17 p. 17 refers to cumulative effects on health in the region. Clarification is required.

The discussion of health pathways necessarily raises questions about the long-term performance of the DGR. The design intent of the repository is to prevent unintended pathways, and the expectation is that no radiological or contaminated material would leave the site under normal operating conditions.

Further, NWMO states '*...direct effects to non-indigenous health conditions through the Impact Assessment Act is not anticipated*'. But, '*the NWMO will continue to engage with the Anishinaabe peoples of WLON and other potentially affected Indigenous Nations and communities that may be affected by the Project to understand potential pathways*. We would welcome clarification on how potential pathways may differ between Indigenous and non-Indigenous communities situated in proximity to the project site. Given the geographic context, we suggest that pathways, if any were to occur, would likely affect multiple communities regardless of their status. We encourage NWMO to consider parallel engagement with both Indigenous and non-Indigenous communities on this question.

Comment NWMO-RSOI-6 p. 9 states, '*It is through the HHERA [Human Health Risk Assessment] that potential radiation exposures to nearby communities and sensitive populations is assessed and evaluated.... exposures to the public and sensitive populations are expected to be a very small fraction of the public dose limits.*' As peer reviewers, based on preliminary information, we can concur with the NWMO assessment. We note that NWMO's commitment to maintaining exposures well below regulatory limits appears to be broadly consistent with the design intent of preventing off-site pathways. We welcome further clarification on how these two aspects are reconciled.

## USED FUEL TRANSPORTATION

The transportation of used nuclear fuel is regulated by CNSC through a separate process. The studies appended to the NWMO response provide assurance that used fuel can be transported safely. These studies address the IAAC transportation SOI issues. While NWMO's analysis and commitment to safety is well done there are areas that the Township of Ignace should discuss with NWMO or monitor during the Impact Assessment process.

In reaching this conclusion we examined a range of issues:

Initially, we examined the industry's successes and risks associated with on-site movement of Used Nuclear Fuel and the regulatory framework applicable to transportation on public highways, using data presented in NWMO reports. We also considered whether the most hazardous part could be at the front and back end of the transportation trip.

- NWMO's response includes the *Confidence in Transportation Package Performance Report – NWMO-0009-03* (p.183). The referenced document applies only to off-site transportation activities and does not discuss on-site movement of *Used Nuclear Fuel* (UNF). Please note, the referenced document provides an excellent summary of risks and issues for off-site transportation and concludes there have been no incidences of significant harm to the public from releases of radioactive material during off-site transportation.
- On-site movement of Used Nuclear Fuel is briefly mentioned in the Responses to Summary of Issues document specific to comment number *NWMO-RSOI-6* where a series of hot cells is discussed. In addition, more details on on-site movement are provided in *NWMO-RSOI-35*, including information on the safety analysis process for accidents required by CNSC. On-site transportation functions are mentioned in *NWMO-RSOI-49*, but most of the text in this response applies to off-site transportation.
- On-site transportation/movement begins when the truck enters the facility gate. Unfortunately, the Responses document does not provide details at this stage. The *NWMO Conceptual Design Report (CDR) (APM-REP-00440-0211-R000)* provides more details for the on-site movement and the safety systems and programs to support operations. The CDR is referenced 6 times in the IDP (e.g., Acrobat page 879). However, other than in the Hosting Agreement, the CDR is not mentioned in the Responses document. HSAL suggests that NWMO be encouraged by the Township of Ignace to provide additional references to this important report. Licensing the DGR facility by CNSC will require an extremely rigorous safety analysis and assessment process as required by *CNSC RD-310*. New activities and revised operations will require implementation of a formal *Unreviewed Safety Question* process to determine if CNSC approval is required for the change in operations.

The safety of all on-site movement will be enveloped by these rigorous processes. However, this formal process will not start until the facility is nearer to operations phase. Off-loading UNF, moving it around the DGR site and into the DGR are of most interest. The Responses document does not address the hazards and controls for these activities. Please note the loading of UNF on the vehicle is under the safety envelope, CNSC licensing, and documentation for the shipping facility and shipping cask; neither the DGR nor the NWMO have responsibility. Current used nuclear fuel owners need to address this activity. Future explanation of impact testing regarding the transshipment points, off loading onto packaging, placement on dolly's, placement in shafts or ramps, placement in shafts and placement arms would be welcomed.

- As to the regulatory framework, off-site transportation, including on public highways, is under the control of both the CNSC and Transport Canada. CNSC covers the certification and licensing of the Type B shipping cask. Transport Canada covers normal transportation aspects for dangerous goods, including, but not limited to, training, vehicle inspections, placarding, manifesting, driver work hours, notifications, and emergency response. Both of these regulators apply to both road and rail transport approaches. For on-site movement, clarification is required as to whether Transport Canada is involved because the DGR site does not have public access. CNSC will have licensing approval for the site including on-site movement.
- NWMO provides comprehensive and globally recognized research on the safety of the Used Fuel Transportation Package (UFTP) with respect to Type B packages. For example, the *Confidence in Transportation Package Performance (Executive Summary)*, *Calian Nuclear Report NWMO-0009-05, Version 4.0, 13 September 2023*, refers to the success of *'the impact tests (an inclusive term for the Free-Drop and Puncture tests) consist of a series of two tests: Free-Drop Test and Puncture Test.'* p. 17 Section 3.2.1. Further, the *Generic Transportation Worker Dose Assessment NWMO TR-2014-17 December 2014 Table 15: Occupational Dose Summary*, p. 28, 29 states, *'Activities conducted within the boundaries of the associated facilities to prepare a shipment for transport and process a shipment after arrival are not included in the scope of this report (i.e., loading of fuel into the UFTP, on-site transfers of the UFTP, UFTP inspection and testing, loading, securing of the UFTP onto transport trailer at the point of origin and unloading of UFTP at the destination).'* We would recommend that studies of these activities be completed as part of the Impact Assessment.
- We performed a high-level overview of both *Dose Assessment Appendices* to see if we would need to review them in detail. We observed that the assessments used appropriate

computer software for the modeling process, detailed design information on the shipping cask, and comprehensive exposure scenarios with reasonable assumptions on exposure times. And the assessment results were, radiation doses that are a small fraction of the regulatory public dose limit. At this level we did not notice any issues and we won't proceed with a detailed review of the Dose Assessment Appendices.

- Several specific comments are relevant. The titles to both *Dose Assessment Appendices (I and J)* should include the word "Transportation." This consistent with the actual titles of the documents in these Appendices. The *Dose Assessment Appendices* are based on only the Used Fuel Transport Package (UFTP) and did not include the Dry Storage Container nor the Basket Transportation Package. Clarification would be welcomed.
- According to text and figure in Appendix G, Preliminary Transportation Plan, on Acrobat page 528 of the Responses document, the road/rail option would require an intermodal facility to transfer the type B shipping casks between the modes of transport. We have not yet seen any discussion on whether this intermodal facility would be part of the DGR project nor any details/hazards/risks/licensing/etc. for this type of facility.
- According to the text in *Appendix G, Preliminary Transportation Plan*, on Acrobat page 525, NWMO anticipates the consolidation of the used fuel bundles at the Whiteshell interim storage facility with the used fuel bundles at the Chalk River facility. According to the map on Acrobat page 524, this would require the Whitesell material to be moved past the Ignace Revell location and then eventually be transported back to Ignace Revell site.
- Considering that radiation protection and health physics was a concern identified in the *Plain Language Summary* of the IDP (and the draft IDP we previously reviewed) we have not yet seen a commitment to having a Radiation Protection Program and a Radiation Protection Plan document. In the response to *NMWO-RSOI-6* (Acrobat page 18) and other places in the Responses document, NWMO made that commitment. The Township of Ignace will need to monitor the future delivery of these documents.
- *NWMO Used Fuel Transportation System Transportation Collision Data & Mitigation Assessment Transportation Collision Mitigation Report October 2023 - Nuclear Transport Solutions* refers to the Used Fuel Vehicles being escorted by a security team p. 22 ...'turn directions for the drivers and security escorts via the route plan.' Section 5.3.1. Escorts p. 41 states, 'For security escort arrangements, REGDOC-2.12.3 [21] states that any transport of Category II material "should be accompanied by one or more escorts". Security escorts are required to maintain constant surveillance of the cargo by travelling in either an

*accompanying vehicle or in the cargo carrying vehicle.*’ If there are going to be escorts, the Township of Ignace may wish to enquire as to whether the security team can be based in offices located in the Township of Ignace.

- *NWMO’s Preliminary Transportation Plan, December 2021, p. 8 Transportation Modes states, ‘The transportation systems being considered assume the predominant use of existing infrastructure; however, some local site infrastructure will be required.’* The question arises, what local site infrastructure is being considered? Will this infrastructure require additional approvals? Municipal approvals? Could the infrastructure be located in the Township of Ignace? Additional information would be welcomed.
- *NWMO’s Preliminary Transportation Plan, December 2021, p. 24-25 Section 2.2.2. Emergency Management and Security states, ‘The NWMO will also need to consider either owning or contracting the following equipment to support emergency management preparedness.’* A list of equipment is provided. It raises the question of: Is there a role for Township of Ignace businesses in contracting the equipment? Further, *Section 2.3.4 Management System, p. 27 states, ‘The regulations described in section 2.2 outline requirements for training, monitoring and auditing. Specifically, the CNSC requires training of workers and emergency responders as part of the application for the licence to transport.’* The question arises; can the training, monitoring and auditing functions be based in facilities located in Ignace?

#### **TYPES AND VOLUMES OF USED FUEL**

- *NWMO’s Preliminary Transportation Plan, December 2021, p. 5, Section 1.1 Number of Used Fuel Bundles states, ‘As mandated in the Nuclear Fuel Waste Act, the NWMO is responsible for all Canada’s used nuclear fuel – including that created using new or emerging technologies like small modular reactors. This means that used fuel could be transported from any province that chooses to pursue the use of small modular reactors, including those west of Manitoba.’* This comment appears to be inconsistent with statements on proposed volumes of used fuel managed in the Revell DGR. Clarification is required.

#### **OCCUPATIONAL HEALTH AND SAFETY AND NUCLEAR SAFETY**

- The Township of Ignace referred to both occupational health and safety and nuclear safety as part of its review of the IPD. In reviewing NWMO’s response to the SOI, we refer to the above noted study of generic transportation worker doses. Specifically, the *Generic*

*Transportation Worker Dose Assessment NWMO TR-2014-17 December 2014* is well done. We would expect NWMO to produce similar dose assessments for all workers.

## **BALANCING ECOLOGICAL ENGAGEMENT**

Construction effects to terrestrial, riparian and wetland environment, reclamation, wildlife and their habitat, species at risk and habitat; fish and fish habitat, birds (Including migratory birds) and their habitat, will be studied as part of the Integrated Impact Assessment process. NWMO mentions that through ongoing engagement, the Impact Statement will consider shared values and perspectives of WLON and other potentially affected Indigenous Nations and communities.

However, Hardy Stevenson and Associates Limited is aware that these issues are also important to Ignace residents. We note the opportunity to include Ignace residents alongside Indigenous Nations in engagement on the environmental matters, and look forward to NWMO addressing this in subsequent phases.

## **ADVANCING NUCLEAR LICENSEE CULTURE**

Through the work of NWMO Canada will benefit by three changes pertaining to used nuclear fuel. There will be: 1) a change of management practice; 2) a change in location; and 3) a change in ownership. The issue of change of ownership needs additional work.

For example, NWMO's framing of being a nuclear licensee appears to focus on primarily on the License to Operate. However, as stated in the Township of Ignace's comments on the IPD, in developing the DGR, the ownership of used nuclear fuel should be top of mind. It should guide engineering and site preparation decisions before the License to Prepare Site is sought. For example, the establishment of radiation protection boundaries; the need to move the camp in the future if located within a Residential Exclusion Zone; where will low and medium level waste will be managed; and, the location and controls pertaining to a transshipment facility.

## **LOCATION OF THE CAMP**

NWMO proposes an on-site camp. They have not indicated where the camp will be, except in the most general terms. The aspect of radiological protection, notably the placement of the on-site camp in relation to future licensing requirements for a Residential Exclusion Zone, has not yet been addressed and relates to the broader issue of occupational health and safety that the Township has previously raised. DGR workers should instead be housed in Ignace. The Township looks forward to further discussion with NWMO on this matter.

## **CONTINUING OPPORTUNITIES TO ENHANCE SOCIO-ECONOMIC BENEFITS FOR THE TOWNSHIP OF IGNACE AND NORTHWESTERN ONTARIO**

### **Township of Ignace Hosting Agreement**

NWMO attaches the Township of Ignace Hosting Agreement in its entirety. In doing so, it points to studies and plans that are required under the hosting agreement. In reviewing the IPD, the Township shared with NWMO a broader set of recommendations and health and socio-economic evaluation techniques that should characterize the Impact Assessment methodology. We would have welcomed these matters to be addressed more broadly in NWMO's response to the issues list.

**Water Taking and Discharge:** *NWMO-RSOI-9*, p. 11, '*...water taking and discharge locations during site preparation, construction and operations, can be informed by engagement with Wabigoon Lake Ojibway Nation (WLON) and other potentially affected Indigenous Nations and communities.*' The Township of Ignace's stated interests on water taking and discharged have not yet been reflected in NWMO's response. The Township respectfully requests that it be included in engagement on these matters alongside Indigenous Nations.

**Waste Generated During Project Operations:** *NWMO-RSOI-7*, p. 10 There is no reference to where on site the waste will be managed, either radiological or conventional. Nor a reference to the Township of Ignace's waste management facilities, which could be used for conventional waste management.

**Monitoring and Institutional Controls:** *NWMO-RSOI-31*, p. 22. NWMO is proposing to engage Indigenous communities about institutional controls but not non-indigenous communities. There has been rich non-indigenous public discussion about institutional controls. Given the established and productive dialogue with non-indigenous host communities, the Township would welcome parallel engagement.

Further, pertaining to *Annex A*, *NWMO-RSOI-78*, p. 48 IAAC asks, '*...need more information on who would be monitoring the health impacts of the DGR to be consistent with CNSC regulatory expectations for radiation protection and environmental health oversight.*' NWMO responds, '*the NWMO will meet all regulatory requirements from the Canadian Nuclear Safety Commission (CNSC), as they describe.*' The Township notes that NWMO's response does not fully specify who would be responsible for monitoring health impacts. The Township suggests strengthening the response by clarifying NWMO's role, CNSC oversight, and the potential monitoring role of the host community.

**Default to Hosting Agreement and Nuclear Fuel Waste Act:** NWMO-RSOI-19 to 29, NWMO addresses psychosocial health impacts in *NWMO-RSOI-18*, p. 18. NWMO states all of the socio-economic issues are framed by NWMO's assessment of the limit of their obligations under the law. They state, *'The NWMO confirms that socio-economic mitigation measures for the Project have already been established and adopted pursuant to the Nuclear Fuel Waste Act....'* P. 18. Also, pertaining to *NWMO-RSOI-75*, p. 45, ...NWMO submits that the prohibition outlined in *Section 7* of the IAA should not apply to the ongoing development of social or economic programs with communities. Accordingly, programs are being addressed through the NFWA framework and associated Hosting Agreements, rather than through the full scope of socio-economic, psychosocial and health impact factors relevant to the federal integrated impact assessment process. Clarification is required.

We observe, the Township's request to have socio-economic optimization as an Impact Assessment goal has not yet been reflected in NWMO's response. We encourage NWMO to revisit and add this assessment methodology in subsequent phases.

**Fire and Emergency Response:** Given that NWMO has demonstrated a strong capability in addressing fire and safety issues related to used fuel transportation, we encourage an equally proactive and comprehensive approach to on-site fire response from the outset. We recommend that NWMO consider embracing a nuclear licensee culture that addresses fire and all safety matters from the earliest stages of project development. Addressing these matters progressively, beginning with the Initial Licence to Prepare Site, would help avoid constraints that may be more difficult to resolve at the Operating License stage.

**Nuclear Safety:** CNSC States (CNSC-2) – NWMO must consider the requirement of having an onsite emergency response team that is trained to respond to underground emergencies and ensure it is clearly indicated in the Impact Statement. NWMO States - *The NWMO understands and recognizes that underground work requires specialized emergency response teams to be present. This information will be clearly indicated in the Integrated Impact Statement and Initial Licence Application.* The Township would encourage NWMO to consider establishing an on-site nuclear health and safety team as early as practicable, rather than deferring this to a later stage in the regulatory process. As stated above, early establishment of this capacity would reflect the proactive nuclear safety culture the Township anticipated of a world-class DGR.

#### **Quality Management:**

We examined NWMO's commitment to Quality Management at this early stage. Specifically, comments in *Appendix B – NWMO's Response to CNSC Comments Table 3 – item CNCS 33 – Quality Management*, (p. 63), NWMO indicates that work is ongoing. We note that as with

most of the responses to CNSC comments, NWMO deferred to the future “Integrated Impact Statement and Initial Impact Application” for resolution.

However, in this case, CNSC did not request any change to the IPD, but instead referred to a description of the process to implement QA/QC and to provide documents when available.

NWMO indicates it has a Management System suite of programs for quality management for some current activities. Identifying the applicable standards within which the Management System suite complies, and describing the process for bringing other current activities under that suite, would further strengthen the response.

We expect that NWMO will provide more details on the process that NWMO is using in addition to stating it will comply with *CSA N286*. Further, we would expect NWMO to provide an organization chart (or link to it) and description indicating the independence of the QA/QC organization and activities.