From:	Sylvia Green-Guenette
Sent Date:	Mon May 11 00:51:39 2026
To:	Nuclear Waste / Déchets Nucléaires (IAAC/AEIC)
CC:	
Subject:	Concern for Storage of High-Level Nuclear Fuel Waste Underground

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To the Impact Assessment of Canada Panel:

Regarding Project #88774 Nuclear Waste Management Organization (NWMO) and plans to transport, repackage, bury and abandon all of Canada's high-level nuclear fuel waste near Revell Lake in Northwestern Ontario.

The NWMO consistently assures people that the high level nuclear fuel waste, the most deadly, toxic and corrosive materials ever known to man, will be kept safely contained in 3mm coated copper canisters once they are emplaced in the earth 500 to 800 metres underground, should the project go forward.

1. Radiation Releases During Transport

In such case, it is widely understood from NWMO modeling, that during transport of high level nuclear waste or there would be radiation emissions released – gamma rays and neutrons would not all be contained. The risk of contamination to the 3. - to air, soil, and ALL LIFE would be exposed to the poisonous radiation at some level.

2. Transfer of Containers

The NWMO project lacks many specifics, but their current model proposes several transfers:
- from dry storage containers at reactor sites to transport containers (method?);
- transfer at DGR site from transport vehicle to repackaging plant (method?);
- transfer from transport package to 'copper' container (method?); and
- transported to underground emplacement rooms.

One of my great concerns regarding all these transfers of the high-level nuclear waste from various decades of storage, is for risk every single time the containment cask or package is exposed to the environment, is creating opportunities for something to go amiss. There could be radiation contamination due to mechanical breakdowns, defects in any of the containers, accidents or human error resulting in exposure to the environment, including workers and innocent bystanders to a deadly radioactive mixture of hundreds of fission products and transuranic elements that might escape.

3. Insufficient Testing

Knowing that this project to bury over 100,000 tonnes of high-level nuclear fuel waste has never been done in the world, it remains an experiment for which there has been to date (to my knowledge), a gross insufficient amount of testing done – certainly nowhere has there been high level nuclear waste-loaded 3mm coated copper canister been buried 500 – 800 metres underground for a period of at least 50 years to see if it was safe from all the uncertain possibilities of corrosion and/or breach. The testing of containers has been negligible, and cannot be proclaimed that they would be 'safely' stored for eternity.

Conclusion

The guidelines for NWMO should definitely include rigorous research and serious consideration of the factors regarding the state of old used fuel rods, the transfer of containers and casks of high-level nuclear fuel waste, including the transporting of such waste for any, but especially long distances, and the lack of real testing of the entire proposed processes. My conclusion is that the entire proposal should be scrapped, and that the NWMO follow the proximity principle, ensuring robust containment on or near the reactor sites with continual safe

monitoring and upgrading when deemed necessary. It would not only be much safer, but a great difference in cost to the government and the Canadian public, financially, socially and economically.

Thank you for your consideration.

Sylvia Green-Guenette

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