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**Subject:** Instead of wasting Citizens" and Taxpayers" time and money on 2 DGRs and their Cumulative Environmental Effects, investigate 1 DGR for all levels of nuclear waste!  
**Date:** April 7, 2017 2:26:25 PM  
**Importance:** High

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April 7, 2017

Hi Minister McKenna and CEAA Project Manager:

Instead of wasting Citizens' and Taxpayers' time and money on 2 separate DGRs and their Cumulative Environmental Effects, investigate 1 DGR for all levels of nuclear waste!

1. How can any Citizen and Taxpayer trust anything OPG says. After all, OPG has spent some 15 years investigating and supporting OPG's DGR for clothes and rags at OPG's Kincardine site. Yet, even after all of this time, and after trying to clarify almost 600 questions asked by the the JRP, CEAA, and the Minister, Minister McKenna and CEAA still have grave questions on key issues that require answers from OPG prior to this forever project having any chance of being approved. How is this remotely possible? How can anyone trust OPG after all this time? Any reasonable person would think that after 15 years of investigation and study, OPG would have provided an Application that required little if any editing or clarification. Such uncertainty on such an uncertain project requires certain dismissal of OPG's DGR application. And this is after obscene amounts of Taxpayer dollars having been spent, but prior to even more obscene squandering of Taxpayer dollars.
2. At the top of the list, is the alternate DGR sites requirement that should have been part of the process from day one of this 15 year journey. OPG ignored the Minister's Order requiring OPG to study and report on alternate DGR sites by simply reporting to the Minister that any alternate DGR site would be too costly and would require dangerous transportation of nuclear waste that was unnecessary at the on-site DGR proposed at Kincardine. Inexplicably, Minister McKenna and CEAA is giving OPG another kick at the can even though it completely ignored her Order. And this after 15 years of ignoring required alternate DGR sites. Inexcusable!
3. Let's put this new CEAA Order directed to OPG to finally investigate alternative DGR sites in the present context. Any report that OPG submits is guaranteed to be the textbook definition of "confirmation bias" that was condemned by Ontario Court of Appeal Justice Stephan Goudge in his brilliant 2008 Report on the catastrophe found in forensic pathology expert evidence. It is guaranteed that OPG will find as a fact that the Kincardine DGR site is the best DGR site. Why? Because to find otherwise that another DGR site is preferable would be an admission by OPG that OPG simply wasted obscene amounts of Taxpayer dollars in the millions in pursuing the Kincardine DGR site that should never be approved. Jeffrey Lyash, the CEO and President of OPG, confirms this by his comments made to W5 on April 1, 2017: "My conclusion is that the process that's been applied here and the science that underlies it are some of the strongest I have seen." Astonishingly, Mr. Lyash makes the following point: "[The geology is some of the best rock in the world.] If we thought there was a better site, if I thought there was a better site for this, we would certainly consider that." Why then does Mr. Lyash not stop the NWMO [that OPG owns] from investigating 21 other DGR sites for its spent fuel? In other words, an independent and unbiased entity must investigate and study and report on alternate DGR sites. And do so for 1 DGR for all levels of nuclear

waste. Unfortunately, there is no such entity and OPG's opportunity to do so evaporated 15 years ago when OPG inexplicably ignored the requirement. OPG simply cannot be trusted and Citizens and Taxpayers must be protected from OPG's mishandling of this entire DGR catastrophe that cannot be repaired.

4. As though that was not enough, in addition, Minister McKenna and CEAA has once again inexplicably required OPG to waste our precious Taxpayer dollars investigating and studying speculative future Cumulative Environmental Effects related to building 2 separate DGRs, a DGR for clothes and rags with a separate DGR for spent nuclear fuel.

5. But do Citizens and Taxpayers really need to be exposed forever to the cumulative effects from dangerous radioactivity from 2 separate DGRs, or is dangerous exposure to 1 DGR all that is required?

6. What if you threw all levels of nuclear waste into the same DGR? Not only would Citizens and Taxpayers not have to foot the bill for a meaningless Cumulative Effects study, more importantly, Citizens and Taxpayers would not have to foot the bill [in the billions and billions] for 2 separate DGRs. Even government officials would have to agree that that is a good idea.

7. As a result, Citizens and Taxpayers require Minister McKenna and CEAA to investigate 1 DGR to store all nuclear waste together, i.e., low level clothes and rags, intermediate level, and spent fuel, just as it is presently safely stored together on the surface.

8. And what does 1 DGR accomplish? Everything Minister McKenna and CEAA are looking for. Currently 21 alternate sites are being investigated related to spent fuel – the real villain in all of this. Citizens and Taxpayers would rather have their Taxpayer dollars spent just once on alternate DGR sites by the spent fuel investigators rather than doubling up Taxpayer expenses with a separate investigation related to an alternate DGR site for clothes and rags. It is pure wasteful and squandering of Taxpayer dollars that could be used for health, education, and legal aid. The irresponsible squandering of Taxpayer dollars in this process is reprehensible. And why investigate beyond the 21 alternate sites identified? Since no other site entered the sweepstakes, it would be pointless to study alternate sites where there was no compelling willing Community. Once the spent fuel investigation is completed the clothes and rags and intermediate levels of nuclear waste can become roommates by simply adding them to whatever project prevails. This is what should have happened from the very beginning, but irresponsibly and inexplicably did not. In any event, OPG must not be allowed to continue this irresponsible, unaccountable, and reprehensible squandering of Citizen and Taxpayer dollars on the fraudulent 2-Track, 2-DGR government boondoggle of all boondoggles.

9. And not to mention the Canadian Environmental Assessment Act, s. 54, 2 year Statute of Limitations, with limited extensions, that bars the OPG DGR for clothes and rags from continuing.

10. As a result, Minister McKenna must dismiss the OPG DGR Application for low and intermediate level nuclear waste.

Most Respectfully,

John Mann  
Citizen and Registered Participant  
Saugeen Shores