

Deep Geologic Repository Joint Review Panel

Response to information request from Dr. Muecke
in connection with September 10, 2014 oral intervention by

Stop The Great Lakes Nuclear Dump Inc.

In the Matter of

Ontario Power Generation Inc.

Proposed Environmental Impact Statement
for OPG's Deep Geological Repository
(DGR) Project for Low and Intermediate
Level Waste

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September 11, 2014

Question posed by Dr. Muecke as shown on Page 228 of official transcript of September 10, 2014 proceedings:

“Ms Fernandez, could you provide the panel with additional information to support your assertion that the panel’s guidelines require OPG to evaluate an actual alternative site? “

Stop The Great Lakes Nuclear Dump Response to Question posed by Dr. Muecke:

The following information is contained in Section 7 of the EIS guidelines:

- this section of the EIS must identify any alternatives to the DGR that are within the control and/or interests of the proponent;
- the EIS must identify and describe the alternative means to carry out the project that are, from the perspective of the proponent, technically and economically feasible.
- the analysis of “alternatives to” a project may serve to validate that the preferred alternative is a reasonable approach to meeting need and purpose and is consistent with the aims of the *Canadian Environmental Assessment Act*.
- To the extent that these alternative means are feasible for the proponent, this may include but are not limited to ...siting of the DGR in a location outside the existing site.

Our assertion that the Panel guidelines required OPG to consider an actual alternate site is supported by the following:

- OPG is wholly owned by the Government of Ontario;
- 87% of Ontario’s land mass is crown land;
- It is reasonable to conclude that many potential actual sites are located on land that is within the control and/or interests of the Ontario Government and by extension OPG;
- We assert OPG should have reasonably concluded, based on the considerable body of work undertaken by the Seaborn Panel demonstrating the technical feasibility of a deep geologic repository in the granite of the Canadian Shield, that the siting a DGR in a

location outside of the existing site as an alternative means, for example on an actual site in the granite of the Canadian Shield, is likely to be technically feasible;

- We assert that if OPG had considered multiple actual sites, this would have demonstrated that it had exercised due diligence and taken a reasonable approach to validate its judgement of the preferred alternative as required under the Panel guidelines;
- We would assert that the disposal of nuclear waste is considerably more complicated and with many more serious repercussions than is the siting of a landfill site. Given that that selection of a landfill site in Ontario requires consideration of multiple actual sites, we believe it is reasonable to assert that, in respect of a disposal site for radioactive nuclear waste, even more stringent siting requirements would be required including consideration of multiple actual sites; and
- Finally, we would assert that considering actual sites as an alternative means complies with the Panel guidelines because it is consistent with an aim of the Canadian Environmental Assessment Act, which is to ensure that designated projects are considered in a careful and precautionary manner to avoid significant adverse environmental effects.

In light of all of the above, we believe our assertion that the Panel guidelines required OPG to consider an actual alternate site is reasonable and defensible.