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Written Closing Remarks from Eugene Bourgeois

Observations écrites finales de Eugene Bourgeois

In the Matter of

À l'égard de

Ontario Power Generation Inc.

Ontario Power Generation Inc.

OPG's Deep Geological Repository (DGR)
Project for Low and Intermediate Level
Radioactive Waste

Installation de stockage de déchets radioactifs à
faible et moyenne activité dans des couches
géologiques profondes

Joint Review Panel

Commission d'examen conjoint

October 2014

Octobre 2014

Summation Comments about the Proposed DGR

To begin, I continue to rely upon each of the submissions, queries and comments I have placed on the record, including those which have not yet been posted. These address such diverse topics as OPG's (Ontario Power Generation) and CNSC's (Canadian Nuclear Safety Commission):

- failure to provide relevant data (groundwater contamination of Inverhuron Park wetlands; apparent fabrication of data for the EIS (Environmental Impact Statement), such as Table JA1-1; composition of the waste rock tailings pile);
- failure to communicate its plans fully and honestly to municipal residents;
- failure to consult with these residents about the likely consequences to them resulting from the DGR (Deep Geologic Repository) and its supporting activities;
- failure to provide a Property Value Protection Plan that protects resident stakeholders from the stigma effects of the DGR;
- failure to address or describe to municipal residents the significant issues of stigma taking into account the conclusions of the Ivey Business School report for Kincardine in 2004 and prior to the official 'polling' of residents in 2005;
- failure to comply with the laws of Ontario by engaging in secret and illegal meetings with municipal and regional councillors and officers of the municipalities as official business meetings with these municipalities in respect of the DGR and the proposed EIS;
- failure to disclose the nature of impacts of the DGR on the health and welfare of area residents (including discussions in the CCAG (Community Consultation Advisory Group) meetings with the Mayor and municipal officers about the stigma effects identified in the Ivey Business School report);
- failure to develop a protocol to measure and assess the impacts on human health (including refusing to engage in baseline testing) in the Site Study Area, even while acknowledging that adequate data does not currently exist;
- reliance on models (such as AERMOD) that have failed to provide safety to resident stakeholders in the past;
- reliance on opinion or modelling information over actual data, even when the analyses have been conducted and the data are available;
- failure to test its model assumptions against known data (such as OPG's and CNSC's failure to test fumigation scenarios against known and accepted events);
- failure to seek alternative or critical reviews of its analyses (such as CNSC's refusal to allow or foster a critical review of the RADICON report by experts selected by resident stakeholders);
- failure to consider alternatives to the DGR, including the 'status quo' option with equal rigour;
- failure to identify fully the inventory of radiological chemicals it plans to bury in the DGR;
- failure to conduct a cumulative effects analysis that considers all the available toxins, their synergisms and their pathways from the nuclear site to the surrounding communities and biosphere by transporting site pollutants to these communities;
- failure to identify properly the communities affected by the DGR and to engage in meaningful, respectful dialogue with these communities;

- failure to identify the site specific meteorology and its potential impacts to the health and well-being of area residents, tourists and visitors;
- failure to elucidate fully the costs of the various alternatives;
- failure to explain why the ‘status quo’ option, described as the least expensive one at about a quarter of the cost of the DGR, is not the chosen option;
- failure to consider the chemistry of the waste rock tailings and the impact this will have on the settlement ponds, surrounding biosphere, surface and groundwater;
- failure to consider the role the TIBL (Thermal Internal Boundary Layer) will play in the Inverhuron community by comparing waste rock tailing piles, such as one in Northern Saskatchewan (as CNSC did during the 2014 Hearings) where no TIBL will be present, with the proposed waste rock tailing pile here, where one is present during much of the year;
- failure to compare the impacts on human health and the biosphere of uranium tailings, (such as one in Saskatchewan) with known comparable uranium tailings sites, (such as the ‘superfund’ site in Utah where the impacts on local human health are known to be highest at locations where radon from these tailings is also highest in the community);
- failure to consider the impacts of thermals created by the waste rock tailings pile, (such as when Dr. Rawlings discussed a theoretical rock pile rather than one which contains the known or knowable characteristics of this proposed rock pile);
- failure to describe the waste rock tailings pile as one which will promote the development of thermals instead of as one that is simply a bump on the surface, as Dr. Rawlings seemed to suggest when he asserted that air would simply flow over the rock pile, much as snow might blow over a snow fence.

For each of these reasons, OPG has failed to submit an Environmental Impact Statement that fully demonstrates the DGR will be the best of the four alternatives offered for consideration in the EIS; will not result in significant adverse effects; nor promote the good health and well-being of resident stakeholders. Instead, I urge the panel to reject this application for a DGR and recommend that OPG maintains the ‘status quo’ option until such time as it addresses these and all other outstanding issues.

Thank you.