

PMD 13-P1.98.A

File / dossier : 8.01.07

Date: 2014-10-08

Edocs: 4533972

**Written Closing Remarks from
Canadian Nuclear Society**

**Observations écrites finales de
Canadian Nuclear Society**

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

**DGR Joint Review Panel Hearing Closing Remarks
in Support of an Oral Intervention**

October 2014

**Deep Geologic Repository for Low and Intermediate
Level Radioactive Waste Project:**

A proposal by Ontario Power Generation to prepare a site, and construct and operate a facility for the long-term management of low and intermediate level radioactive waste at the Bruce Nuclear site, within the Municipality of Kincardine, Ontario.

The Canadian Nuclear Society (CNS)

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The Canadian Nuclear Society (CNS), a not-for-profit learned society dedicated to effective communication on the peaceful applications of Canadian nuclear science and technology, believes that the safe, efficient and effective long-term management of nuclear waste materials is a vital part of Canada's nuclear infrastructure. Ontario Power Generation's (OPG's) proposed Deep Geologic Repository (DGR) for Low and Intermediate Level Waste (L&ILW) will play an important role in ensuring the sustainable operation of Canada's nuclear industry for the long term.

In our written submission and oral presentation we focussed on three aspects of the proposed DGR project: justification, technical support, and public consultation. We concluded that the project is an ethical approach to sustainable waste management, addressing a large volume of current L&ILW that is will be significantly larger in the near future. The technical risks minimal, as shown by a broad scope of environmental interaction studies, and the study of the geology of the site itself. Of most importance to the well-being of stakeholders in this project, and therefore to the well-being of the project itself, is the breadth and clarity of public communication on the safety of the DGR. The value of addressing effectively the social side of the safety risk analysis cannot be underestimated.

In short, it is clear that "something" must be done with this waste material, and if not within a DGR, then continued use of current above-ground engineered storage, in roughly the same location (i.e. the Bruce site), is a probable alternative. The general public – the main benefactors of the process that has generated (and will generate) this waste material – must make a decision about the responsible management of this material.

As an organisation dedicated to effective communication on nuclear issues with all stakeholders, the CNS views with interest the level of public engagement associated with the DGR project. We note that, regardless of the convincing justification and technical merit for the DGR, a project of this nature will often stand or fall on its public perception.

This is, of course, an important part also of the Environmental Assessment process. The CNS is concerned, however, that a number of aspects of the DGR project have the potential to be obstacles in the eyes of certain stakeholders, particularly those living on the shores of Lake Huron and the downstream communities. On the face of it, the simple proximity to the lake itself can cause concern, particularly if one doesn't fully appreciate the geoscience arguments that, ironically, make the DGR probably one of the safest and most sustainable proposals from any Canadian industry for dealing with its long-term waste legacy.

We encourage OPG to continue engaging the public, and to seek effective ways to communicate the safety of this project – in particular, the role played by natural barriers, and the high level of confidence that the scientific community has in these barriers, based partly upon natural analogues. We also encourage OPG to engage as wide a stakeholder community as possible, beyond that typically required for EA consultation. We note that both the management of radioactivity and the management of water resources are top-of-mind concerns for Canadian and American citizens alike. Put another way, the enormity of the Great Lake that sits beside this project is matched only by the enormity of the "nuclearphobic meme" that sits at the root of public perception of this project.

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