

PMD 14-P1.39.A

File / dossier : 8.01.07  
Date: 2014-10-06  
Edocs: 4532263

**Written Closing Remarks from  
James and Brenda Preston**

**Observations écrites finales de  
James et Brenda Preston**

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**



Deep Geologic Repository Joint Review Panel

Closing Remarks from  
**James & Brenda Preston**

*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

October 2014

Dr Swanson, Dr Archibald, Dr Muecke

We would like to thank the Joint Review Panel for the opportunity to voice our final concerns regarding the proposed DGR on the Bruce site. The public hearings were a tremendous learning curve for all involved. The Joint Review Panel has a daunting task. Your decision will impact thousands of generations.

Let us start with our conclusion. We cannot support a DGR located anywhere in the Great Lakes Basin. Today, we feel more certain of this position than at the beginning of the 2013 Hearings.

We would like to discuss our unanswered questions and ongoing concerns.

### **Willing Host**

The hearings opened with a clear statement by OPG that a Willing Host Community was necessary along with approval by the SON. It is clear that this process was horribly flawed.

The concerns of the SON are only now being addressed both in public forums and in private meetings. We are very supportive of this process.

The "Willing Host Community" designation is a sham. The original studies were not reflective of the true intent of the proposed project. The wording of the survey was biased towards a desired result. There was a restrictive timeline for completion that excluded full local community participation. There has been no open public dialogue and forums with the entire community affected by the project, either before or since the survey.

The current Municipal Council is ill-informed of the details of the project as they have evolved. Most were not present when the Hosting Agreement was signed. Most were not present when the Golder report was written. Most councilors currently running for office have little knowledge of the ever-changing waste content to be buried in the DGR. They are simply relying on the JRP to make the right decision.

The 2004 Golder Report forecast the total waste would be 130,000 m<sup>3</sup> of which ILW would be 10%. This was the Independent Assessment taken to the public. The project has morphed into a 400,000 m<sup>3</sup> DGR containing approximately 20% ILW including highly toxic decommissioning waste. It was just learned that this might not be the final size of the DGR. It could contain the waste from additional reconditioning projects and new reactors.

Mayor Sutton openly stated it was known all along that the decommissioning waste would be included in the project. The Warden during his Intervention and in questioning stated that he was not aware of this until recently (June 2013) and it was not discussed at County Council. It is obvious that there was a clear intent to withhold information from the public. The flow of information was managed to keep the public in the dark and gain the necessary approvals prior to revealing the true details of the project.

Consent really isn't informed and the participant is not proven to be willing, if they don't have all of the details and fully understand them.

The "voting" process was flawed. A telephone survey was strategically planned to be held in the winter when all seasonal residents and many permanent residents were away. The survey was done Jan 6-25,

2005; data was collected; paper surveys were mailed out and returned; the report was written and submitted for auditing; audited; presented at council AND passed by February 16, 2005.

OPG refuses to conduct an open referendum of all residents in the Great Lakes Basin. Rather than broad public support, there is substantial evidence of strong opposition to the DGR Project.

### **Site Selection**

Is it a coincidence that the best geology available for the long term storage of LLW and ILW is in a DGR immediately below a reactor sited at Douglas Point fifty years ago? We were told at that time the location was due to the proximity to fresh water required for a CANDU reactor. We were told that the WWMF was located here some forty years ago due to the proximity to the reactors and the remoteness of the site to the populated areas of Toronto. Now we are told that this location is superior due to the unparalleled geology yet 15 miles to the north the geology is not suitable for a second DGR. During the hearings we were also told that the site was selected due to the recommendation of the Mayor of Kincardine. What can we believe!

The Hearings very clearly showed there were no alternative sites investigated. There was no comprehensive discussion as to how we might more accurately classify waste within the broad categories of LLW and ILW and then identify alternative storage options for these revised waste classifications.

The Hearings also heard expert testimony of concerns with the geology, the waste volumes and composition and the final design of the shaft seals. The Safety Case was predominately justified with computer modeling. When the models, contents of the repository and seals were challenged by experts such as Dr Greening the mood turned defensive and their information discarded. Unresolved issues and solutions seem to be deferred to a private forum between OPG and CNSC after the requested license is granted. We will then be past the point of no return.

### **Local Health Concerns**

It is shocking that there has been no comprehensive community health study to document and track cancers and other health issues associated with ionizing radiation. The Bruce site is home to the world's largest nuclear power facility. It is home to WWMF which stores all of Ontario's LLW and ILW and now wants to be home to Canada's first DGR. The impacts of a nuclear presence in our community are unknown. Why is there no baseline study and why does CNSC not require a study? Their Radicon study has been critiqued and its shortcomings published. How is CNSC protecting our health and clearly monitoring that we are not at risk.

As we stated in our first Intervention, inappropriate storage of nuclear weapons waste near Coldwater Creek in St Louis Missouri generated alarming cancer and health statistics that were negated by authorities. The original community health survey was done by a group of "lay people" who noticed an inordinate amount of cancers, and other illnesses in their communities. Finally, the St. Louis County Department of Health is calling "for more study of health problems in and around Coldwater Creek - not just cancers but the entire range of health problems that can be associated with exposure to radiation."

The impact of the Nuclear Industry on life forms is still in its infancy. Due to the long latency period before symptoms and disease may occur it is irresponsible of both OPG and CNSC to state that there will be no cumulative effects from this proposed DGR. Why are they unwilling to conduct the necessary health studies to prove it?

The short term health impact from a 35 meter high rock pile is also troubling as is the blasting to create it. The noise and vibrations will be significant. The chemical characteristics of the rocks being excavated from 650 meters below the surface are unknown. The airborne particulate will immediately impact those suffering from asthma . The latent health effects on the balance of the residents may take several years for diagnosis.

We learned during the hearing of unexplained Iodine 131 emissions from the incinerator. We are concerned we will have no knowledge of the type and amount of chemicals we are and will be bombarded with on a daily basis.

We see the impact today of the changes in Inverhuron Bay that have been thrust upon us. The decline in the fish stock in the past 50 years in terms of size and numbers has been dramatic. We fear the overflow from the storm water management pond into MacPherson Bay will have a continuing negative impact on the quality of our water, beaches and fish stock.

Emotional distress and mental health are discarded as issues. A WIPP type event or worse would be catastrophic to the community of Inverhuron. We learned nothing from the interventions or submissions that remotely gave us comfort that our mental or physical health could be properly dealt with on a timely and efficient basis.

There is no discussion and analysis of the cumulative impact of the various causes of physical and emotional health concerns.

Finally, there is no disaster plan in place for the safety of local residents. There has been no decision made on an effective distribution of potassium iodine pills. There is no local hospital in Kincardine or Saugeen Shores that could handle a disaster of any magnitude.

### **Financial Concerns**

Bruce County has a large population of retirees, farmers and seasonal residents who have had / will have no financial gain from Bruce Power, WWMF nor the proposed DGR. They have simply borne the burden of living in an area with a higher cost of living and stagnant real estate values.

Their interests were never represented in the creation of a reasonable Property Protection Plan (PPP). Our PPP was negotiated by the Municipality of Kincardine who negotiated a \$35 million payment spread over ten years in return for their unwavering support of the DGR.

Neither OPG nor the Municipality of Kincardine sought any input before agreeing to a PPP on behalf of the residents. Some like us have 150 years of history and seven generations of livelihood and safe enjoyment of the community that has been placed in jeopardy. There was no quantification of the Stigma effect and the certain decline in real estate values that was pointed out in the Ivey Business School Report commissioned by the Municipality. If there is an "incident" even if able to be mitigated, it will permanently decimate property values. Is anyone going to buy a property near our WIPP?

Mayor Kramer stated that we benefitted from the financial gain of Bruce Power and WWMF so it is our responsibility to deal with the waste. We disagree. The Province of Ontario benefitted from the jobs and power generated at Bruce Power, Pickering and Darlington. They ALL produce a high percentage of the power consumed by Ontario business and consumers and have ALL produced waste. Ontario must share in the issue of waste disposal not simply the Municipality of Kincardine.

### **Great Lakes**

To date over 134 communities have passed resolutions that oppose the location of a DGR in the Great Lakes Basin. Water is life. "The waters of the Great Lakes Basin are precious public resources shared by the Great Lakes States and Canadian Provinces". Over 40 million people rely upon the Great Lakes for their drinking water. Nuclear waste is the most toxic waste known to man. Some of the proposed ILW to be buried in the DGR will take over 100,000 years to lose its toxicity. Our water and this nuclear waste should never ever be placed in close proximity.

### **Summation**

The approval of the location of a DGR within the Great Lakes Basin is a VERY dangerous precedent. We are jeopardizing **Generational Equity** in 21% of the world's fresh water and our personal 7<sup>th</sup> generational Equity in Inverhuron.

### **Conclusion**

We ask the Joint Review Panel to reject the application of a DGR in the Municipality of Kincardine.

Respectfully Submitted  
Jim & Brenda Preston