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**Written Closing Remarks from the
Bruce Peninsula
Environment Group**

**Observations écrites finales de
Bruce Peninsula
Environment Group**

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

CLOSING REMARKS by the BRUCE PENINSULA ENVIRONMENT GROUP (BPEG) on the JOINT REVIEW PANEL ENVIRONMENTAL ASSESSMENT of ONTARIO POWER GENERATION'S proposed DEEP GEOLOGICAL REPOSITORY for LOW- and INTERMEDIATE LEVEL RADIOACTIVE WASTE.

We would like to begin with expressing our deep appreciation to you, Madame Chair, and your valued Panel Members for the unprecedented diligence and quest for fairness in pursuing to try and cover all the issues and components connected with this first-of-its-kind proposed project.

I personally have not experienced this kind of diligence in my intervening, first on behalf of BPEG and then on behalf of Citizens for Renewable Energy (CFRE) before the Atomic Energy Control Board and now the Canadian Nuclear Safety Commission.

I have participated in this JRP EA right from the start – first as founder and coordinator of CFRE during the CNSC deliberations and decisions and the request to the Minister of Environment for a JRP EA, then the Draft EIS Guidelines, the Terms of Reference – and since 2010 for BPEG in the public hearings as co-founder and outreach director.

Looking back it really has evolved as OPG picking the site of their proposed DGR at the Western Waste Management Facility (WWMF) for its convenience, then in closed door meetings getting consent from only a handful of elected municipal representatives, lured by monetary gain.

From the initial intent of storing only low-level radioactive waste, OPG then, for convenience sake, added a small proportion of intermediate-

level, long-lived radioactive waste, which now, as proposed, has been considerably expanded for convenience sake.

According to OPG and NWMO the site, co-located with the Bruce Power Generation Facility, on a spit, jutting out into Lake Huron, and located only approximately 1,300 metres from the Lake Huron shore, is ideally suited because of its millennia-old limestone formation.

No other similar deep geologic repositories have been sited in this type of rock formation. The only operating deep repository, the Waste Isolation Pilot Plant (WIPP) is located in a salt mine in the desert near Carlsbad, New Mexico, U.S.A.

OPG has tried through intensive tests and explorations to prove that their conveniently chosen site will safely keep their long-lived radioactive waste out of the environment for hundreds of thousands of years, lowballing any catastrophic accidents or natural disasters.

OPG has tried to assure the Panel and the government ministries and the general public that any radioactive emissions that could occur would not harm the 'Reference Man', the outdated model of the International Committee on Radiation Protection (ICRP), that does not protect women or children not to mention the unborn!

OPG has also tried to assure the Panel that their financial funding for the 300-year long construction, operation and maintenance period is sound, albeit with unlimited guarantees of taxpayer subsidies, (and only if their risky stock market investments don't suffer deep losses again like in the last financial crisis).

There were numerous safety concerns for such a proposed first-of-its-kind millennial term project brought forward and we heard

sophisticated assurances of safety guaranties, which, when challenged, were reported to be founded on 'Professional Judgment'. We prefer to call those assurances Prophetic Predictions.

We refer to the prediction that the WIPP repository was predicted to safely contain that highly radioactive waste for 100,000 years. Well, only 15 years from its start the unpredictable happened. And, having watched some of the latest town hall meetings on Lifestream webinar, I found out that there are always more questions than answers, investigations are not concluded even after more than 6 months. There is a list of 700 action items that will have to be performed –does anybody care to predict what the future of this 'long term, safe' repository will be after it already has contaminated a couple of dozen workers above ground!?

OPG has confirmed that the storage capacity for its wastes at the WWMF would not be reached for several decades, and probably a few hundred years – if OPG is directed to keep Pickering and Darlington Low- and intermediate level radioactive wastes stored safely at their respective sites. As a recent example, the U.S. Nuclear Regulatory Commission has determined that nuclear reactors there can safely store their waste for unlimited time at their sites (Waste Confidence decision).

There is no urgency rushing into an unpredictably risky project that is proposed for the edge of our valued and vulnerable Great Lakes ecosystem and opposed by hundreds of thousands on both sides of our Lakes and very critically viewed by our aboriginal societies.

The EIS Guidelines very prominently point to the high importance of considering and applying the Precautionary Principle to assess and

probe all the very real , as well as the unknown, risks before making a definite far reaching decision.

We hope and pray that this Joint Review Panel, in its wisdom, will find that applying this Principle will lead it to defer a decision pending further investigation of less risky solutions.

Thank you very much indeed for the opportunity to provide these closing remarks on this very well conducted Environmental Panel Assessment.

Respectfully submitted on behalf of the Bruce Peninsula Environment Group,

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