

From: <ole@nrtco.net>

Date: Sat, Aug 5, 2017 at 8:18 PM

Subject: City of Ottawa comments on the Near Surface Disposal Facility

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Dear Ms. Di Iorio, Mr. Willis, Mr. Wylie, and Dr. Levy:

Our group, Concerned Citizens of Renfrew County and Area, is very disappointed with the poor quality of the comments that you have submitted on behalf of the City of Ottawa related to the proposed Near Surface Disposal Facility at the Chalk River Laboratories.

Your comments repeatedly refer to the proposed facility as an "engineered storage facility". This is incorrect. Canadian Nuclear Laboratories, the proponent, has made its intent to build and operate a permanent radioactive waste disposal facility very clear.

Canadian Nuclear Safety Commission REGDOC-3.6, Glossary of CNSC Terminology, defines "disposal" as "the placement of radioactive waste without the intention of retrieval". This means that corrective action may be impossible if the facility does not perform as anticipated. In addition to the potential for releases of radioactive and other toxic substances during the projected 50-year operational period, the inevitable deterioration of an above-ground mound would result in large-scale population doses of radiation following closure: small incremental radiation exposures to a very large number of downstream residents for a very long time period (over 100,000 years).

Your failure to properly characterize this as a disposal project in your comments is inexcusable. No permanent radioactive waste disposal facilities exist in Canada. The International Atomic Energy Agency (IAEA) has developed extensive guidance on radioactive waste disposal. IAEA Safety Standard SSR-5, Disposal of Radioactive Waste, emphasizes that a specific aim of disposal is "To ensure that the amounts of radionuclides reaching the accessible biosphere due to any migration from the disposal facility are such that possible radiological consequences are acceptably low at all times."

In your comments, rather than emphasizing the need to ensure that Ottawa residents are protected from unacceptable radiation exposures, you call for "improvements... to better notify residents and activate emergency response plans as needed." In essence, provided that officials are informed when spills occur, the City of Ottawa is on record as supporting a radioactive waste facility of a type and in a location that can create unacceptable radiological consequences for Ottawa residents.

We regret your failure to acknowledge that many citizens, including a number of scientific experts, are closely following the discussions about this project and have expressed serious concerns. We would like to draw to your attention the comments of Dr. J.R. Walker, former Director of Safety Engineering and Licensing at the Chalk River Laboratories, who says that

a) The proposal employs inadequate technology and is problematically located; b) The proposal does not meet regulatory requirements with respect to the health and safety of persons and the protection of the environment; and c) The authors have failed to meet the requirements of the Canadian Environmental Assessment Act 2012.

Some of our members, including myself, not only have properties near the location of the proposed facility, but are also residents of the City of Ottawa. Our group has repeatedly requested a meeting with Environment and Climate Protection Committee Chair David Chernushenko, who is copied on your submission. We have not yet been given the courtesy of a direct reply from Mr. Chernushenko.

As noted in IAEA Safety Standard SSR-5, "The process of involving interested parties in decision making processes for disposal facilities is increasingly seen to be of great importance." Was your submission discussed and approved by members of the Environment Committee? If not, in making a submission on behalf of the City of Ottawa without listening to citizens' concerns, you have violated basic standards of democratic process.

We ask that you retract your ill-informed comments, and that you consult interested Ottawa residents prior to making any revised submission on this matter.

Sincerely yours,

Ole Hendrickson, Ph.D.
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