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International Joint Commission  
Canada and United States

July 23, 2012

Re: Request for your reconsideration of a meeting regarding the immediate need to reinstitute an International Joint Commission Nuclear Task Force.

Dear Commissioner Lana Pollack, Chair U.S. Section and  
Commissioner Joseph Comuzzi, Chair, Canadian Section:

Thank you for your response (attached IJCdenial2) to our 2011 request for a meeting regarding a special report on nuclear issues needed as part of the new GLWQA and a new IJC Nuclear Task Force to produce such a report.

We reiterate our request for a meeting (attached 2011 IJC) because of the well-known, ongoing and potentially catastrophic toxicity of specific radionuclides.

Reinstating an IJC Nuclear Task Force will greatly assist in fulfilling your recently announced priority work during 2012-2015 including Assessment of Progress Toward Restoring the Great Lakes and Assessing the Capacity to Deliver Great Lakes Science and Information.

Much greater follow up on the many concerns of your first Nuclear Task Force is required as shown in the reports "Inventory of Radionuclides for the Great Lakes" (<http://www.ijc.org/php/publications/html/invrep/index.html>), and "Report of Bioaccumulation of Elements to Accompany the Inventory of Radionuclides in the Great Lakes Basin" (<http://www.ijc.org/rel/boards/nuclear/bio/index.html>).

As stated in our presentation to you at your 2009 Biennial Meeting (attached 2009 IJC), the US response to the IJC's 1998 Ninth Biennial Report section on radioactivity wrongly claimed that adequate monitoring and exposure assumptions and standards were in place, that the nuclear waste problems would be solved, and that nuclear power could eliminate the need for fossil-fuel generation.

For the sake of the Great Lakes ecosystem, we urge you to take full advantage of the extensive expertise that Great Lakes United -- our large collective of public interest and environmental organizations from both Canada and US -- is offering. Hearing from government regulatory agencies and one organization, which is not a part of the Great Lakes United team that is entirely focused on the Great Lakes, does not provide you with a comprehensive overview of radioactive threats to this ecosystem. Expecting the existing nuclear regulatory agencies (NRC and CNSC) to trigger further investigation or review of nuclear issues in the Great Lakes is to expect from them an admission of their own limitations. In this manner specific threats to the Great Lakes have been downplayed or ignored.

Please reconsider our offer to meet with you and provide detailed, comprehensive information input on the necessity for a new IJC Nuclear Task Force, coming as it does from groups having professionals as well as dedicated volunteers who deal daily with Great Lakes Nuclear issues.

A hard copy of this letter and the attachments will be sent by regular mail tomorrow.

Yours sincerely,

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International Joint Commission  
Canada and United States



Commission mixte internationale  
Canada et États-Unis

May 18, 2012

Ms. Anabel Dwyer  
Member, Board of Directors  
Lawyers' Committee on Nuclear Policy  
866 UN Plaza, Suite 4050  
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Dear Ms. Dwyer:

Thank you for your letter of October 25, 2011 bringing to the attention of the Commission your concerns about nuclear issues around the Great Lakes. We appreciate both your letter and the presentations made by concerned citizens at the town hall meeting held in conjunction with our biennial Great Lakes Water Quality meeting in Detroit last fall. This letter follows up on the November 1, 2011, acknowledgment to you from our U.S. and Canadian Section Secretaries.

Commissioners appreciate the concerns you have raised. As you point out, the Commission has in the past studied nuclear energy and waste issues in the Great Lakes basin and has made recommendations to governments. The Commission reviewed nuclear issues in the Great Lakes in the context of its biennial report cycle (see for examples see the Commission's Ninth, Tenth and Eleventh Biennial Reports on Great Lakes Water Quality). In our 1997 publication "The IJC in the 21<sup>st</sup> Century," the Commission identified a number of nuclear issues for which the Canadian and U.S. governments might consider issuing a reference to the Commission, under the Boundary Waters Treaty. A reference requires the Commission to examine and report on questions and concerns shared by the governments or matters of difference arising between them. Governments have not issued such a reference to the Commission.

The Commission was briefed on April 24, 2012, by both the U.S. Nuclear Regulatory Commission and the Canadian Nuclear Safety Commission on nuclear energy and waste issues in the Great Lakes region. In addition, we heard from a representative of the Union of Concerned Scientists.

In the absence of a specific reference from governments, the Commission will not be taking action on the matter of nuclear facilities and nuclear waste storage in the Great Lakes Basin at this time.

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We thank you for your interest in the health of the Great Lakes ecosystem. We appreciate you bringing your concerns and recommendations to the Commission.

Sincerely,



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Chair  
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Joseph Comuzzi  
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Canadian Section

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The International Joint Commission on Great Lakes Water Quality

Date: October 25, 2011

Re: Special Report on Nuclear Issues needed as part of the new Great Lakes Water Quality Agreement (GLWQA), and a new IJC Nuclear Task Force to produce such a report.

We request a meeting to discuss the content of a Special Report on Nuclear Issues and the mandate of a new IJC Nuclear Task Force.

The IJC understands from its earlier Nuclear Task Force reports and numerous studies that radioactive forms of toxic chemicals, from reactors, uranium mines, mills and reprocessing facilities and accumulated waste, harm and endanger the Great Lakes ecosystem and human health.

In order to restore and maintain the Great Lakes water quality and because of the very high impact of accidental or intentional releases, a Nuclear Issues Special Report is needed in the context of the new GLWQA. We request that the International Joint Commission (IJC) form a new Nuclear Task Force to write a Nuclear Issues Special Report.

The Nuclear Issues Special Report as part of the new GLWQA would:

1. Summarize existing documentation of presence and sources in the Great Lakes watershed of at least the radioactive forms of toxic chemicals identified in the IJC's 1998 Ninth Biennial Report section on radioactivity: tritium, carbon-14, iodine-129, isotopes of plutonium and radium-226.
2. Define toxic chemicals for virtual elimination to include specifically but not exclusively highly dangerous and long-lived radioactive forms.
3. Update exposure standards and assure consistency of monitoring for known bio-hazardous radionuclides.
4. Integrate the Special Report written by the new Nuclear Task Force directly into the proposed Science Annex and Annex on Climate Change.
5. Look at existing subsidies and liability related to nuclear industries or corporations in order to properly assign accountability for known harms and dangers.

We would like to request an appropriate meeting with Commissioners and staff to discuss implementation of our suggestions. We urge you to include in the new Nuclear Task Force

qualified members independent of nuclear industries and regulatory agencies so that this work could be accomplished rapidly and effectively.

We are among many groups and individuals that have asked the IJC to recommend to and inform the governments of the US and Canada that it is inappropriate to transport radioactive waste from decommissioned reactors or spent fuel on the Great Lakes or through the St. Lawrence River or along the shores of these bodies of water.

As a result of long-standing concerns, many of us are involved in efforts to end any further licenses, permits or subsidies for or from known sources of contamination until decommissioning, dismantlement, waste and proliferation problems including radiological and toxicological human and ecological effects are properly addressed and remediated. We have submitted or will submit written comments for your 2012 Biennial Report but because of the extreme harms and dangers involved we urge you to take these recommended steps.

Thank you,

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## **Re: Nuclear Issues**

To: The International Joint Commission on Great Lakes Water Quality  
2009 Biennial Meeting Public Forum and Dialogue  
10:00 AM Thursday, October 8, 2009  
Chrysler Theatre, The St. Clair Centre for the Arts, Windsor, Ontario

### **Clean, appropriate energy supply technologies**

The IJC's 2002 11<sup>th</sup> Biennial Report is the most recent to address "nuclear issues" (Sec. 12, "Further Matters of Importance"). It notes problems that were raised regarding metallurgical fatigue, waste discharges and waste storage in fast-track nuclear plant license renewals and concludes: "Despite the above very real concerns, nuclear power can eliminate the need for fossil fuel generation and the increase in air-borne contaminants that would result."

This conclusion is based on a false dichotomy. The choice you presented either denies unsolved and highly dangerous problems of the nuclear system or is presented as a dilemma, a choice between the devil and the deep blue sea. The major problems of climate change due to alarming CO<sub>2</sub> levels and of the nuclear system (dangers and costs of nuclear waste, contamination and proliferation) are human-induced and must be solved together. While these problems are global, what we accomplish in the Great Lakes basin can go a long way in facing the realities and dangers. We have and can develop choices in clean, appropriate energy supply technologies (c.f. "Carbon-Free and Nuclear-Free: A Roadmap for US Energy Policy," Dr. Arjun Makhijani, IEER, 2008). In addition, contrary to your statement, the nuclear fuel chain involves production of air-borne contaminants including CO<sub>2</sub> every step of the way.

### **Restoration and preservation of the Great Lakes Water Quality according to the Agreement must take into account all toxic chemicals.**

You have in the past recognized that your definition of toxic chemicals includes their radioactive forms. Ten years ago the Nuclear Task Force partially completed work based on your recommendations. For example, in the IJC's 1998 Ninth Biennial Report section on radioactivity you recommended the following:

1. Governments comprehensively review all monitoring at nuclear facilities in the Great Lakes Basin with a view to making the monitoring more accommodating to the needs of the Agreement.
2. Governments monitor toxic chemicals used in large quantities at nuclear power plants, identify radioactive forms of toxic chemicals and analyze their impact on the Great Lakes ecosystem.
3. Governments investigate and report toxicological and ecological problems associated with tritium, carbon-14, iodine-129, isotopes of plutonium and radium-226.

The U.S. response in 1998, claimed that adequate monitoring and exposure assumptions and standards were in place and that the waste problems especially of high-level waste would be solved by now. Neither is the case.

**The IJC should this year make the following recommendations and take the appropriate steps to ensure that they are carried through:**

1. Standards of exposure to and monitoring of radionuclides must replace the “Reference Man” standard and be updated to all of humanity (e.g. specific to a growing fetus, children, the elderly, women and those with compromised immune systems), future generations and the ecosystem. These standards should be made consistently and reported to the public in becquerels.
2. All monitoring and investigation of persistent toxic substances for virtual elimination necessary for restoration and preservation of the Great Lakes basin must include at least the radionuclides listed above in your 1998 recommendation.
3. No new licenses, permits or subsidies should be issued for any new reactors, waste sites or uranium mines until all problems including decommissioning, waste and proliferation as well as radiological and toxicological human and ecological effects are properly addressed and remediated.

Thank you,

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