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Written Submission from
John deRosenroll

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

Joint Review Panel

September 16 to October 12, 2013

Mémoire de
John deRosenroll

À l'égard de

Ontario Power Generation Inc.

Étude proposée pour l'énoncé des incidences
environnementales pour l'Installation de
stockage de déchets radioactifs à faible et
moyenne activité dans des couches géologiques
profondes

Commission d'examen conjoint

16 septembre au 12 octobre 2013

July 18th, 2013

Joint Review Panel Secretariat – DGR
C/o Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street, Ottawa, ON K1P 5S9

Dear: Dr Stella Swanson

Re: Ontario Power Generation Deep Geologic Repository Licensing Hearings

By means of this letter, I wish to provide written comment in regard to the Canadian Environmental Assessment being undertaken for the proposed Deep Geologic Repository in Kincardine, Ontario.

As the former Chief Administrative Officer (CAO) for the Municipality of Kincardine (1999 to 2011), I can offer insight as to both the historical conditions that created the community dialogue about the Deep Geologic Repository (DGR) and most importantly, why I believe that the citizens of the host community (Municipality of Kincardine) became an informed and engaged group with respect to the DGR project.

Early in 2001, the Municipality of Kincardine was trying to recover from the recession of 2000 and locally from the decision to close four of the Bruce's eight reactors in response to the Nuclear Asset Optimization Plan (1997). This was also a period of time in which the Bruce Nuclear Generating Site was in the midst of a transition from the historical Ontario Hydro to Ontario Power Generation (OPG).

The reason for this historic commentary is to demonstrate that the early years of the decade were a time of change in the Nuclear Landscape in Kincardine and the citizens of the community were concerned with the long-term view of our economy.

It should be noted that during this time period, the Municipality of Kincardine was also aware of draft federal legislation (Nuclear Waste Fuel Act) that would form the Nuclear Waste Management Organization to lead with the development and implementation of a long-term management plan for all of Canada's used nuclear fuel bundles. This begged the question, what about OPG's low and intermediate level waste that has been managed at the Western Waste Management Facility (WWMF) at the Bruce site for over 40 years – what about a long-term management plan for this waste? Kincardine was aware OPG, as the producer of the low and intermediate level waste, was responsible for its long-term management.

From this position, the Municipality of Kincardine approached OPG to discuss what the local host community could do to help ensure the longevity of the Power Generation/Waste Management industry in Kincardine for present and future generations.

These meetings concluded in 2002, with the Municipality of Kincardine and Ontario Power Generation signing a Memorandum of Understanding (MOU). This MOU set out the terms under which both Kincardine and OPG would jointly assess the feasibility of the long-term management of low and intermediate level nuclear waste at the Western Waste Management facility. The local feeling in 2002 was that the nuclear industry in Kincardine had a stellar record of handling the nuclear waste in a safe fashion for over forty (40) years and that it was incumbent upon today's generation to demonstrate an ethical responsibility to provide a safe, long-term solution for the low and intermediate level waste on behalf of present and future generations. As the generation that has

benefitted from the nuclear industry, we felt that we should be involved in a sustainable solution for the existing waste, instead of leaving it for future generations.

At this stage, in order to help Kincardine and OPG understand the safety issues that would be associated with any type of long-term waste management facility, Golder Associates were hired to conduct an independent assessment of the various long-term management options for low and intermediate level nuclear waste designs, and then to report back to the community with their findings.

From this seminal report, the community recommended that the Deep Geologic Repository would be their preferred option, due to the greater safety margin of this concept, and its ability to manage both low and intermediate level waste.

To get to this important local decision, Kincardine was afforded the financial ability to hire legal, technical and other professional services required to ensure that the decision of Council to support the DGR concept was based on safety, and only then did the economic benefits to the community come into consideration.

Even though the Kincardine Council had been given the opportunity to be informed in regard to the basics of nuclear waste management options, how did we ensure that the public was also informed and most importantly, engaged in the community discussion process?

To ensure that we met this important community consultation principle, the people of Kincardine were provided with extensive information about Nuclear Waste Management

and the broad option to support a process to consider a DGR. A multi-pronged approach was used which included extensive media and stakeholder briefings, a website, advertorials in local papers, newsletters, the mailing of a Keeping You Informed booklet and a Community Consultation Centre on the main street, staffed by both OPG representatives and municipal elected officials and staff. Even though every stone had been turned, in respect to both consultation and informing the public, Council and OPG, as per the DGR Hosting Agreement, felt that it was essential to poll the residents of Kincardine and get their direct decision on the long-term future of Nuclear Waste Management in their community.

To that end, the Strategic Counsel was hired to undertake this independent polling and the consultation question was:

“Do you support the establishment of a facility for the long-term management of low and intermediate level waste at the Western Waste Management facility?”

A preamble, which was read to telephone participants and sent to mail ballot participants, specified that Kincardine Council supported moving forward with a deep geologic repository for low and intermediate level nuclear waste at the Bruce site.

With respect to the polling question the results were:

Yes	60%
No	22%
Neutral	13%
Don't know/refused	5%

From this strong mandate, knowing that there would be lots of future opportunities for the public to express their views about the DGR Project during the regulatory approvals

process, Council made the decision to start the journey with OPG to see if Kincardine would be suitable for a proposed DGR type facility, to manage OPG's low and intermediate waste.

In summation, the process undertaken by the Municipality of Kincardine and OPG exemplified community consultation. I realized that we had an informed and engaged community when I heard citizens of Kincardine discussing the DGR project in the local coffee shop and at that point the true community consultation was taking place.

I trust that this review of the Community Consultation activities helps demonstrate that Kincardine's support for the DGR proposal was that of an informed and engaged community.

Yours truly,

John deRosenroll
Former Chief Administrative Officer (CAO)
Municipality of Kincardine (1999-2011)