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Oral intervention from

James Deutsch

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

Intervention orale par

James Deutsch

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

DGR Joint Review Panel Hearing Written Submission in Support of an Oral Intervention

Submission from James Deutsch, MD, PhD, FRCP(C), Assistant Professor, Dept. of Psychiatry, University of Toronto, and board member for Science for Peace

13 Aug., 2013

First, a quote from:

A MESSAGE TO PEOPLE WHO LIVE NEAR NEVADA TEST SITE:

"Some of you have been inconvenienced by our test operations. At times some of you have been exposed to potential risk from flash, blast, or fall-out. You have accepted the inconvenience or the risk without fuss, without alarm, and without panic. Your cooperation has helped achieve an unusual record of safety. ...

"I want you to know that in the forthcoming series, as has been true in the past, each shot is justified by national and international security need and that none will be fired unless there is adequate assurance of public safety."

UNITED STATES ATOMIC ENERGY COMMISSION,

JOINT TEST ORGANIZATION, CAMP MERCURY, NEVADA, February, 1955

http://www.fourmilab.ch/etexts/www/atomic_tests_nevada/

Science for Peace believes that all persons, not only scientists, have significant contributions to make to public debate. Science for Peace has an over 30 year history of working towards nuclear disarmament. The threat of nuclear weapons nonetheless persists and even increases. Attention has broadened to the entire nuclear chain with the understanding that the nuclear power industry arose out of the military, and that the attendant secrecy has had significant influence on both academic and political/societal processes. By "nuclear chain", we refer to the entire cycle from mining through refining - including depleted uranium weapons as a byproduct - and fission and decommissioning, to storage and disposal, or reprocessing and nuclear weapons.

The public knows that decisions regarding radiation, including the various components of the nuclear fuel chain, are a matter of life and death. This Joint Review Panel is commended for providing this forum for public input. Also deserving of credit are the many people, who have, over the years, pressed for such a forum.

In order to make a realistic decision, this panel needs reliable information, including epidemiological. However, much has been written about the various shortcomings of existing research. I would hope that this panel will demand an answer to the question: why do you not have the information that you need in order to make a responsible decision?

Concerning the origins of the nuclear power industry out of the nuclear weapons industry, the sense of imperative to proceed, and the accompanying aura of secrecy, have greatly distorted the scientific and regulatory process. For example, the WHO must first receive approval from the IAEA prior to addressing and disseminating information on nuclear-related health issues, under what is essentially a business model.

The public asks: How is it that an x-ray can cause cancer, but nuclear medicine can at the same time treat cancer? Why is it not publically known how much and what type of radioactivity were released by above and below-ground detonations? Or where all the disposal and burial sites are for low, medium, and high level waste? Or what the results were from such burials or other forms of disposal? And why is there not open data on the numerous releases, accidents, and near-catastrophes? And who are the people that decide on the standards for determining what is "safe and acceptable"?

For example, are the ads to attract retirees to Elliot Lake (a uranium mining site) consistent with the standard of informed consent regarding medical risks? And how informed were the neighbours of the GE-Hitachi uranium pellet manufacturing plant in downtown Toronto? How is the public, or for that matter the Panel, to evaluate the numerous studies that involve complex statistics and unclear underlying assumptions and biases?

Further confusion arises from the plethora of units and terms; from the frequent lack of clarification of whether one is talking about external or internal exposure, or immediate or delayed effects, and standards promulgated by bodies with links to the industry, that seem to change over time.

The proposed deep geological waste repository represents but one step in the entire nuclear chain. It is our view that any decision regarding any particular step must take into account the entire nuclear chain. This contrasts with the anti-scientific tunnel vision, where one particular part of the nuclear chain is described in isolation from the rest.

A further objection that I hope the panel will raise, in regard to the available data, is the impact on available knowledge and open dialogue stemming from the well-known lack of arms length between the military, industry, regulatory bodies, governments, and various global health agencies, universities, and research institutes. For example, the International Energy Agency represents itself as a

quasi-official entity while it baldly issues misinformation of nuclear risks.

Further, while much has been written in the field of health physics, the state of knowledge regarding the medical aspects of exposure to external and internal radiation is at an early stage. Recent discoveries regarding epigenetic and whole-genome effects call for a fresh, urgent look. Increasingly, it is clear that not only cancer can result (after significant delays) but also teratogenic effects, chromosome damage, and heritable diseases, along with a general increase in vulnerability,

It is our opinion that the panel has a duty as well as an opportunity to examine the numerous unsuccessful and/or harmful attempts to cope with the problem of mounting nuclear waste globally. Any decision regarding any step in the nuclear chain must take into account the implications for the entire chain, including both civilian and military aspects.

With regard to the DGR, without doubt other intervening parties will address the inherent instability of the Earth's crust, due to shifting tectonic plates and glaciation cycles, etc., and the near impossibility to predict behaviours of distant future generations. What is less likely to be addressed is the effect on the inhabitants, especially children, growing up exposed to the ever-increasing human-induced background radiation, and the cumulative results of irresponsible decisions that assign little value to the lives of those in the future, let alone of those currently living, especially the vulnerable and dispossessed,

A recent CBC program on risk (Ideas, <http://www.cbc.ca/ideas/episodes/2013/05/30/risk-part-1-1/>) recounts "lying to the public, misleading the public" by TEPCO and the government of Japan, regarding the (ongoing) Fukushima disaster.

As the causes of public health catastrophes come under increased scrutiny, the state of societal decision-making has advanced, with the recent spelling out of the precautionary principle, and that of free, prior, informed consent. It is necessary that these principles be applied in the nuclear field.