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Oral Statement from

Sierra Club Nuclear Free Campaign

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

Présentation orale par

Sierra Club Nuclear Free Campaign

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

Canada

Sierra Club Nuclear Free Campaign
131 North High Street, Suite 605
Columbus, OH 43215-3026
Phone: 614-461-0734

August 13, 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
DGR.Review@ceaa-acee.gc.ca

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

Dear Dr. Swanson and members of the Joint Review Panel,

The Sierra Club Nuclear Free Campaign has been following for some time Ontario Power Generation's proposal to bury radioactive wastes from 20 of their reactors in a burial site about one-half mile beneath the Bruce Nuclear Generating Station near Kincardine, Ont. The waste would be placed within caverns carved from limestone rock. The proposed experiment has been labeled Deep Geological Repository (DGR).

POOR GEOLOGIC SETTING

There is no precedent for burying radioactive nuclear waste in limestone. The integrity of limestone formations cannot be guaranteed. In even the short term, seismic activity could allow for cracking of the bedrock and water seepage from the lake and associated aquifers into the formation. Limestone caverns and their connections and extensions have been shown to extend for dozens of miles. Even when a cavern extension or fissure comes to an end, there can be other cavern formations very nearby. In the longer term, limestone dissolves under the action of rainwater and groundwater charged with carbon dioxide and naturally occurring organic acids. Even at the present time the waters of Lake Huron may be dissolving limestone, moving closer to fissures and irregularities that could be opened and widened by seismic activity. Earthquakes in the area are not uncommon. The "very low-permeability" of the limestone bedrock asserted by scientists still means permeability, particularly in the geologic time frames that these wastes will remain dangerously radioactive. Reassurances by government or scientists that the particular limestone in the proposed area is somehow immune from the chemical and physical laws that affect other limestone do not hold water, both literally and figuratively.

GREAT LAKES CONTAMINATION

The entrance to this radioactive repository would be less than one-half mile from Lake Huron. The implications of the possibility of the radioactive contamination of Lake Huron and other waters downstream including Lake Erie, Lake Ontario and the St. Lawrence River are frightening. Millions of Americans rely on the Great Lakes for drinking water. Drinking water is but the tip of the iceberg of the importance of protecting the waters of the Great Lakes. The ability of the interests of Ontario Power Generation (OPG) to even hint at threatening the waters of the Great Lakes with a radioactive repository raises many questions.

POLITICAL DECISIONMAKING

The State of Michigan's siting criteria for the disposal of low-level radioactive waste prohibits any site located within 10 miles of Lake Michigan. The contrast between this and the proposed distance for the DGR of 1/2 mile from Lake Huron is dramatic and makes the DGR location appear more political than scientific. The State of

Michigan, which could be considerably impacted by leaks from the proposed DGR, was omitted from the impact area described in the draft EIS. The JRP needs to open up the review process to residents and legislators in Michigan and also to people downstream in Ohio, Pennsylvania and New York.

ECONOMIC DECISIONMAKING

It is impossible to not make the connection between the current location of the bulk of the waste at the Bruce site and the location of the DGR. The economic value of placing the location of the DGR in the proximity of the bulk of the radioactive nuclear waste that is to be buried is not lost upon observers. While the conservation of taxpayer and ratepayer dollars is of high importance, we nonetheless find this location more likely to be a political decision than an independent, scientific proposal.

CONSENTING COMMUNITY

The importance of the consent of surrounding communities for such a monumental project is imperative. However, a consenting community nonetheless remains a political rather than a scientific qualification. Observers question the processes by which such consents were obtained. We remain skeptical that local residents around Kincardine were given equal opportunity for education on the ramifications of this project by opponents of the DGR or by independent scientists. Wooing of elected officials by industrial or development interests is a time-honored tradition. While such interests deserve to have their say, their financial backing almost always far outweighs that of citizen volunteers who usually learn much later that local residents and decision-makers have been approached about a project. Unpaid citizen opponents and nonprofit organizations often lack the funds to hire independent scientists, to travel, or to leave their workplaces to participate in the educational and decision-making process. The possession of important industry or government credentials can give persons undeserved credibility when they come into an area with a message promoting their financial or political interests. Payments of around $1 million per year to struggling communities in the DGR location whose population is around 10,000 could be extremely hard to resist.

We stress that the process of choosing an agreement community must be expanded to include input from all communities within a minimum of a 50-mile radius of the site. Also, all communities along potential transportation routes must be given ample opportunity for input. Many communities and mayors have already spoken vociferously against the DGR, and a process must be in place for weighing their input alongside the input of the Kincardine local area.

OPG REPORT TAKEN AT FACE VALUE

Much of the data presented by DGR proponent OPG has not been independently verified. We state categorically that this is not acceptable and it is our contention that independent studies must be done to verify or refute studies done by OPG.

SUMMARY

While each of the topics addressed above is of sufficient magnitude to require reopening the process of evaluation of the proposed site, taken together they overwhelmingly demonstrate that the JRP must reject this location as unacceptable for a radioactive waste dump.

Sincerely,

Patricia A. Marida

Susan Corbett

Patricia A. Marida, chair
Ohio Sierra Club Nuclear Free Committee

Susan Corbett, chair
Sierra Club Nuclear Free Campaign