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Supplementary Information
Oral Intervention

Presentation from
Patrick Gibbons

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

Renseignements supplémentaires
Intervention orale

Présentation par
Patrick Gibbons

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

A Critique of Criticial Aspects of The OPG DGR Proposal

September 27, 2013
For the Joint Review Panel

Patrick Gibbons

The OPG DGR Proposal

includes:

- Faulty Hosting Agreement in 2004
- Flawed Telephone Poll in 2005
- False Public Participation
- Troublesome Cumulative Effects

Hosting Agreement

There is NO mention of :

- **Stigma effects**
- **Decrease of property value**
- **Decrease in tourism**
- **Decrease in retirees moving to Bruce County**

Hosting Agreement

- Property Value Protection Plan

Requires

Radioactive Contamination

before a claim will be considered

Hosting Agreement

Payments to Adjacent Communities

Is it :

- Bribery?
- Payoffs?
- Hush money?

Hosting Agreement in Summary

- **Potential hazards or dangers are not mentioned**
- **Citizens in adjacent communities do not have a voice**
- **The agreement with Bruce County can not be verified**
- **The size of the DGR has not been established**
- **There is no protection in the PVPP**
- **The Telephone Poll in 2005 was deeply flawed and undemocratic**
- **Payments for 30 years have silenced politicians**

Telephone Poll 2005

L. Kraemer – Kincardine News, Jan. 7, 2005

said: what is needed is

- "**a full democratic process**"
- "**a full public referendum**"
- "**a proper democratic vote, secret ballots, scrutineers**"
- ***NONE* of this occurred**

Telephone Poll – if only they knew

Marie Wilson, Kincardine Times, Jan.5 , 2005

Said:

"If the day were ever to come when the Bruce became the recipient of all of Canada's spent fuel, it would be catastrophic…"

Telephone Poll – if only they knew

Marie Wilson, Kincardine News, Jan.5 , 2005

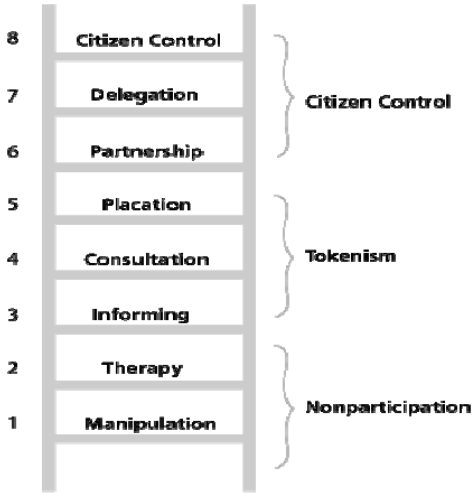
“ tourism, agriculturally related industries …would be destroyed…”

Public Participation

EIS guidelines for the DGR project states

- **Meaningful public participation** requires the proponent to **address concerns of the general public regarding the anticipated or potential environmental effects**
- Proponent is required **to engage residents and organizations in all affected communities**

Participation or "Non-Participation"



Arnstein's Ladder (1969)
Degrees of Citizen Participation

Tritium Levels – Cumulative effect

CNSC states that:

Tritium exposure can pose a health risk if it is ingested through drinking water or food, inhaled or absorbed through the skin in large quantities

(CNSC website - http://nuclearsafety.gc.ca/eng/readingroom/tritium/index.cfm)

Tritium Levels – Cumulative effect

As a result of ongoing studies, in 2011, CNSC resolved to:

- set a design objective for tritium level in groundwater of 100 Bq/L
- provide data on the uncertainty in measurements conducted as part of their monitoring programs

(CNSC Tritium Studies Project Synthesis Report, 2011)

Tritium Levels – Cumulative effect

In 2013, **CNSC staff disagreed with OPG's** conclusion that the "tritium concentrations in WSH243 have stabilized since 2011" as the following figure shows that tritium in the bedrock well is still going up.

(JRP EIS-10-497)

Tritium Levels – Cumulative effect

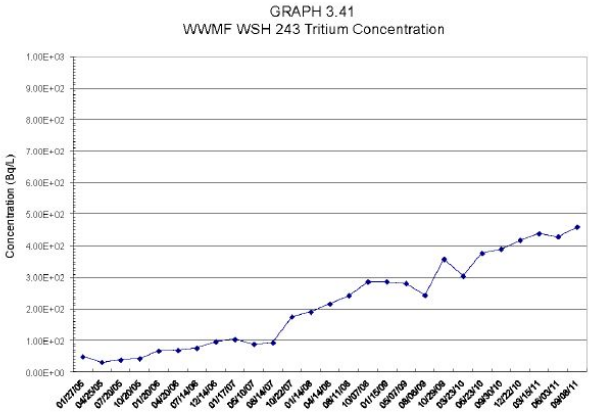
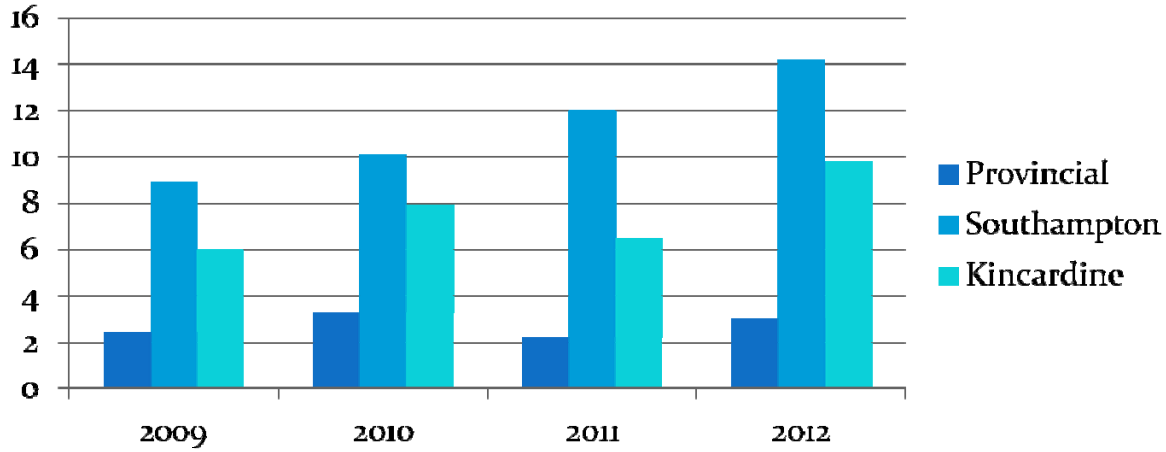


Figure 10: Tritium concentrations in WSH-243 (from OPG, 2011)

ANNUAL TRITIUM CONCENTRATIONS IN DRINKING WATER SUPPLIES Bq/l (2012 BNP ENVIRONMENTAL MONITORING PROGRAM REPORT pg.51)



Questions OPG must answer

- **Have they acted in good faith and exercised best efforts to inform all Bruce County residents of the hazards and dangers?**
- **Were they clear, honest and complete in notifying Bruce County residents of the possible negative health, environmental, social, economic and social effects of their proposal?**
- **Were their Hosting Agreement 2004, Telephone Poll 2005 and the on-going public consultation methods fair, democratic and participatory?**
- **Is their following statement a guarantee – "The DGR will not likely result in any significant adverse effects on human health or the environment?"**

Dr. Stella Swanson, research scientist

- "One of the **central problems** in the debate about the nuclear fuel cycle is **ignorance**. **Scientists** simply do not know what the effects of chronic exposure to low-level radiation are, either in people or in other biota. …We will only begin to know for sure after several more decades have passed and a large population of exposed people has been studied.

Dr. Stella Swanson, research scientist

In the meantime, we have to ask:

'Do we really want to live in this uncertainty? What risks are we willing to accept as a society?' "