

October 23, 2006

From:

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on behalf of Lone Tree Council, West Michigan Environmental Action Council, Michigan Coalition on the Environment and Jewish Life (MI-COEJL), Coalition for a Nuclear-Free Great Lakes, Don't Waste Michigan, Citizens Resistance at Fermi Two (CRAFT), Nuclear-Free Great Lakes Campaign, Green Party of Michigan, Van Buren County Greens, Citizens for Alternatives to Chemical Contamination, Environmental Coalition on Nuclear Power, Environment Michigan, Voices for Earth Justice, Northwoods Wilderness Recovery, Pontiac Agriculture Network, Huron Environmental Activist League, Swords into Plowshares Peace Center & Gallery, Michigan Environmental Council, Fair Food Matters, Holland Peacemakers, Save The Wild U.P., Clean Water Action, Central New York Citizens Awareness Network, Environmental Coalition on Nuclear Power, Pennsylvania Environmental Network, Prairie Island Coalition, North American Water Office, Nuclear Energy Information Service, Citizen Action Coalition of Indiana, Toledo Coalition on Safe Energy, Physicians for Social Responsibility – Wisconsin, Nukewatch, Michigan Chapter Sierra Club, and additional concerned citizens (see full contact information listed at the end of this submission)

To:

Canadian Nuclear Safety Commission

Attn: Michael Rinker, Environmental Assessment Specialist

Environmental Assessment and Protection Division

P.O. Box 1046, Station B

Ottawa, ON K1P 5S9

Phone: 1-800-668-5284 Fax: (613) 995-5086

E-mail: ceaainfo@cnsccsn.gc.ca

Re: Comment on the Proposed Scoping Document (Environmental Assessment Guidelines) for Ontario Power Generation's Proposal for a Deep Geologic Repository for disposal of "low" and intermediate level radioactive wastes in Kincardine, Ontario, Canada

[Submitted via email to ceaainfo@cnsccsn.gc.ca, as well as via Fax to (613) 995-5086]

Dear Mr. Rinker,

We are writing to express our concern about Ontario Power Generation's proposal for a deep underground radioactive waste dump at its Bruce nuclear site in Kincardine, Ontario, Canada only one kilometer (0.62 miles) from the shore of Lake Huron.

We are very disappointed that the staff of the Canadian Nuclear Safety Commission (CNSC) has failed to support an upgrade of the current environmental assessment from a Comprehensive Study to an independent Panel Review. There are three important reasons to do so. First, an independent review panel would ensure a fair hearing, keeping the process at arm's length from the CNSC, which is too close to the nuclear industry. Second, until now, radioactive waste has only been kept in temporary storage facilities, and this proposal would set an historic precedent for permanent deep underground disposal of radioactive waste in Canada and the Great Lakes Basin. Thirdly, because it is so long-lived and has the potential to affect human health and the environment for many generations to come, the public has always been very concerned about radioactive waste disposal, both in Canada, the United States, and in First Nations and Native American Nations throughout the Great Lakes Basin.

While I understand that CNSC staff has expanded the alternatives being considered, alternatives should include monitored, retrievable "interim" storage at the nuclear sites that generated the wastes in the first place, and "reduction at source" of radioactive waste through nuclear phase-out.

In terms of the study area for the assessment, the proposed dump has potential environmental impacts not just locally and regionally, but internationally as well. Because the radioactive wastes will remain toxic for hundreds of thousands of years, the dump is a threat not only to this generation, but to thousands of human generations into the future, and not only to the locality and the region around the Bruce nuclear complex, but also to downstream communities on the Great Lakes in Canada and the United States of America, as well as to First Nations and Native American communities. CNSC staff has rejected any possibility that the dump could have trans-boundary impacts. However, research and documents published by the International Joint Commission on Great Lakes Water Quality make it clear that Canadian nuclear facilities on the Great Lakes have had measurable trans-boundary effects, as have U.S. nuclear facilities. The study area should be expanded to include communities on the Lake Huron shoreline in both the U.S. and Canada, as well as extended to include communities downstream of Bruce that draw their drinking water from Lake Huron and points downstream.

The following important issues also need to be addressed:

-- the lack of Canadian federal policy on the long-term management of low and intermediate level radioactive waste;

-- inclusion of decommissioning waste in planning for the Bruce facility;

- extension of the assessment time to one million years because of the long lifetime of some radioactive elements in low and intermediate level radioactive waste;
- detailed examination of the safety of radioactive waste transportation from the Pickering and Darlington sites to the Bruce site;
- alternatives to radioactive waste incineration;
- municipalities on transportation routes should be consulted on the initiation of further decades of radioactive waste transportation through their communities; and
- costing and economic analysis of the main proposal and all alternatives should be mandatory.

We would also like to tentatively reserve speaking slots for the submission of oral presentations at the Monday, October 23, 2006 CNSC hearing in Kincardine, Ontario, Canada regarding this matter, for representatives of our organizations that may be able to attend this hearing despite the very long travel distances that would be required to attend.

Whether as written or oral submissions, we will continue to communicate to the CNSC our deep concerns about, and objections to, the concentration of radioactive wastes from a score of nuclear reactors across Ontario, and the risk of catastrophic radioactive contamination to Lake Huron and points downstream, if these accumulated wastes begin to leak out from the proposed burial dump just 1 kilometer (0.6 miles) from the shoreline of Lake Huron. Our coalition of groups and individuals deeply troubled about this dangerous proposal continues to grow in Michigan, and we will share with CNSC and other Canadian, U.S., and First Nations decision-makers an updated list of organizations objecting to this radioactive waste dump in the heart of the Great Lakes by the time of the October 23rd CNSC hearing.

We would also like to express our endorsement of the comments submitted by Dave Martin, Energy Coordinator, Greenpeace Canada and S. (Ziggy) Kleinau, Coordinator, Citizens for Renewable Energy, to CNSC as a part of this proceeding.

We also request a copy of the revised scoping document, CMD 06-H22. Our postal and email addresses are given below, so that you can either mail a hard copy of this document, or email us an electronic version or internet link. This document is not posted on the CNSC web site, which has unfortunately made our participation in this proceeding more difficult. We respectfully request that all documents pertaining to this proceeding be posted to CNSC's website, as well as provided directly to us either through the mail or email, to facilitate our participation in this proceeding.

Please also send us any information or application forms pertaining to intervener funding, for those of us who wish to intervene in this environmental assessment proceeding.

Please consider our concerns. Thank you.

Sincerely,

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