

Submission of Comments to Canadian Nuclear Waste Management Organization (NWMO) regarding NWMO's "Choosing A Way Forward" Draft Study Report

Submitted by Kevin Kamps, NIRS, August 31, 2005

Nuclear Information and Resource Service (NIRS) is the information and networking center for citizens and environmental organizations concerned about nuclear power, radioactive waste, radiation, and sustainable energy issues. On behalf of our members throughout the Great Lakes Basin on both sides of the U.S./Canadian border, we submit these comments to the Canadian Nuclear Waste Management Organization.

Canada has a large amount of high-level radioactive waste, mostly generated by 20 reactors in Ontario, 1 reactor in Quebec, 1 reactor in New Brunswick, with a small amount of irradiated fuel generated at research reactors throughout Canada.

It is very troubling that locations on the Great Lakes, such as Sarnia and the Bruce Peninsula near Lake Huron, as well as sites near Lake Ontario, are even being considered for the permanent storage of high-level radioactive wastes, whether above or below ground. A terrorist attack, accident, or eventual leakage from a dump due to deterioration of the waste containers over time releasing high-level radioactive wastes into the Great Lakes would contaminate the source of drinking water for millions of people downstream. The Great Lakes represent 20% of the world's surface fresh water, and thus permanent storage or disposal of high-level radioactive wastes anywhere in the Great Lakes Basin is unacceptable.

Residents of U.S. Great Lakes states downstream from the proposed dump sites – such as Michigan, Ohio, Pennsylvania, and New York – have not been consulted by the Nuclear Waste Management Organization, despite the large potential risks presented by the proposal to store or dump high-level radioactive wastes on the Great Lakes. I have taken part in a number of Canadian Nuclear Safety Commission proceedings involving the Bruce nuclear power plant, for example, and so would expect the NWMO to at least know of my existence and interest to submit comments on nuclear power and radioactive waste policies that impact our organization's members in the Great Lakes Basin. And yet not once was I contacted by the NWMO for my input on its proceedings. Had it not been for my colleagues at environmental organizations in Canada, I would not even have known about the existence of the NWMO. Thus, residents on the U.S. side of the Great Lakes Basin should have the right to comment on proposals that could severely radioactively contaminate the Great Lakes Basin. The NWMO should consult with interested parties in the U.S. on these matters. This would include Native American tribes on the U.S. side of the Great Lakes Basin.

These requests for genuine, meaningful cross-border consultation are bolstered by the very existence of, and positions taken by, the U.S./Canadian International Joint Commission for the Great Lakes and Boundary Waters, which holds that the governments of the First Nations in Canada, Native Americans in the U.S., as well as the

governments of Canada and the United States themselves, all share responsibility for the protection and preservation of the entire Great Lakes Watershed. Thus the August 31st, 2005 deadline must be re-opened, and the NWMO must do genuine, meaningful outreach to residents on the U.S. side of the Great Lake Basin. An adequate period of time – such as 180 days -- must be given for U.S. residents to learn about the NWMO proceedings, and to make meaningful comments.

No permanent dumps for high-level radioactive waste have been opened anywhere in the world, including North America, because every proposed site has been found to be inadequate to the task of isolating from the living environment the harmful and deadly radioactive poisons for the hundreds of thousands to millions of years they would remain hazardous. Despite countless accidental, incidental, and even “routine” radioactive releases that have severely contaminated countless places in the world, the amount of radioactivity contained in Canada’s high-level radioactive waste would dwarf most radioactive stockpiles anywhere else on the planet, with the potential for catastrophic radioactive release due to attack, accident, or leakage. That is why permanent storage or disposal anywhere in the Great Lakes Basin is unacceptable, for it threatens the drinking water supply for tens of millions of people.

But of course similar risks would extend to any location targeted for such dumps, no matter where they are located. For this reason, the only real solution – and the only moral and ethical position, in light of the burdens we are placing upon future generations to monitor, safeguard, and repackage these wastes as necessary forevermore -- to the high-level radioactive waste dilemma is to not generate it in the first place. Nuclear power must be phased out, so that the insoluble high-level radioactive waste problem is a finite one, not an infinite one. It’s important to point out that dry casks on the U.S. side of the border are guaranteed safe by the U.S. Nuclear Regulatory Commission for only a century or so. We would disagree strongly with them that they are safe at all. But a century compared to a million years is a blip. Dry casks are going to need to be repaired or replaced time and time again, forevermore. Once this is considered, it becomes clear that nuclear power is not a cost effective or safe way to generate electricity. Electricity is but the fleeting byproduct from nuclear reactors. The actual product is forever deadly radioactive waste, a problem for which we have no solution.

While rejecting any proposal to permanently store or dispose of high-level radioactive wastes in the Great Lakes Basin, it is also important to point out that the so-called “interim” or “temporary” storage of high-level radioactive wastes on the shores of the Great Lakes is also dangerous and unacceptable. Whether in indoor storage pools or in outdoor “dry storage casks,” these wastes are vulnerable to attack, accident, and eventual leakage. They must be fortified against attack, safeguard against accident, and carefully monitored and repackaged as necessary to prevent any radioactive leakage or release into the surrounding environment and waters of the Great Lakes. I will add here that everything we are calling for on the Canadian side of the border, we are also calling for on the U.S. side of the border. For radioactivity is no respecter of borders or national identity. As the U.S. National Academy of Sciences BEIR (Biological Effects of Ionizing Radiation) VII Report recently confirmed, any exposure to radiation has the potential to

cause cancer and other diseases and genetic damage. And once released into the air, water, or soil, radiation will move throughout the Great Lakes Basin to harm both U.S. and Canadian residents and citizens, both First Nation and Native American inhabitants.

It must also be made clear that so-called “reprocessing” or high-level radioactive wastes is also unacceptable. It is a dangerously polluting process. Take West Valley, New York as a case in point. Only six years of reprocessing took place there, from 1966 to 1972. In fact, only one year’s worth (according to the design capacity of the facility) of irradiated fuel was reprocessed in those six years due to all the break downs and accidents, including fires, that occurred. But in those six short years, massive radioactive contamination of the surrounding environment took place, as well as severe radiation doses to workers. The U.S. Department of Energy (DOE) estimated in 1996 that the clean up costs for the contamination resulting from the reprocessing at West Valley will cost \$5 billion. And if the clean up is not carried out, DOE has predicted that in 1,200 years that radioactive contamination will have eroded into Lake Erie, threatening its very ability to be serve as drinking water or to support healthy ecosystems, including human communities, downstream. In addition, reprocessing risks the proliferation of nuclear weaponry by separating out weapons-usable plutonium and uranium from the other radioactive poisons in the wastes. Reprocessing is unacceptable.

NIRS/WISE recommendations:

Cessation of the generation of high-level radioactive wastes.

Redirection of federal subsidies now going to nuclear power to cleaner, cheaper, safer, more sustainable, and more reliable alternatives sources of electricity, such as solar power, wind power, and other renewables, as well as to energy efficiency and energy conservation measures.

Keep wastes monitorable and retrievable, so that as waste containers deteriorate and fail, they can be repaired and replaced forevermore into the future.

Keep wastes secured against attack, and safeguarded against accident or leakage.

Minimize waste transportation, given the inherent risk to all communities along the transportation route from attack, accident, or leakage.

Grant absolute veto power to any community targeted for a dump or storage site, with no option for overriding the veto by a bigger polity.

Dump opponents should receive full funding from the Canadian government for independent research, community education, and official legal intervention against the proposal.

The Canadian federal government should not allow any high-level radioactive waste to be imported into Canada from any other country.

No high-level radioactive waste generated in other Canadian provinces should be allowed to be imported into the Great Lakes Basin.

Any final decision on the concept of high-level nuclear waste management should be given to the Minister of Environment in Canada, not to the Minister for Natural Resources, who has an inherent conflict of interest given his or her promotion of the mining and natural resource industries

Any final decisions involving high-level radioactive waste management, storage, or disposal must honor and comply with all international treaties, including those with First Nations and Native American Tribes, as well as with the Water Quality Agreements made by Canada with other Great Lakes governmental bodies, including the United States of America and Native American Tribes.

The government of Canada should contact and consult with all Native American/First Nation Tribes within the Great Lakes Basin, as well as with the U.S. federal, state and local governments within the Great Lakes Basin. All stakeholders, including members of the public on the U.S. side of the border, must be advised of the proceedings, consulted for their input, and allowed to fully take part in the decision-making processes. Full public hearings should be held in U.S. states and Native American Tribal communities in the Great Lakes Basin that are downwind and downstream from the proposed Canadian dumpsites. To the best of my knowledge, very little to no notification or involvement has been afforded by NWMO to U.S. resident or Native American Tribes on the U.S. side of the border. Not only NWMO, but also the Canadian federal government, must afford such notice and participation to U.S. and Native American citizens before any decisions are made.

Sincerely,

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