From: Northwatch [mailto:] Sent: February 26, 2012 10:40 AM To: Myles,Debra [CEAA] Cc: Kelly McGee; Subject: Tracking of OPG Information Items re. DGR

Good morning, Debra

I'm following up on an email I received this week from one our Northwatch's technical experts, who wrote with a question about how design updates and corrections to the EIS will be tracked.

He had just done an initial read of the changes and corrections submitted by OPG under the cover of their letter dates February 10th, and emailed to ask how these and another changes would be tracked, noting that a) it will be potentially confusing and certainly inefficient to look at the April 2011 EIS and ask questions and then find out that the section had been changed, and b) in the OPG presentation on February 21 they presented information that had changed, as indicated in the February 10th update, but in the February 21st session it was presented without indicating that it was a change from the proposal as submitted (the example he used was room sizes).

The question to Northwatch from this expert closely relates to the points in Northwatch's letter to the Joint Review Panel of last month about IR management. As you will recall, we wrote to the Joint Review Panel about the tracking of information requests, site visits and advice being given to the Joint Review Panel. With respect to the management of information requests, we had included requests / suggestions that Information Requests not be combined, that a tracking number be assigned, and that responses be provided in an electronic format which is searchable, and sortable by topic, number, source, or EIS Guideline Section (since our letter, the Panel has issued "Preliminary Instructions for the Public Review and Comment Period on the Environmental Impact Statement and Licence Application", and we note that Item #4 responds at least in part to our request that Information Requests not be combined (the Panel has reserved the right to review and consider the subject matter of those submissions rather than to treat them as individual submissions where multiple copies of very similar comments or requests are submitted to the Panel from separate participants).

I also note that in his letter of advice to the Joint Review Panel, dated 23 February 2012, CNSC President Michael Binder includes a list of "best practices" which included the item *"implement tracking tool for information requests (good system developed for Darlington JRP)."* 

With the Public Review period now underway, we anticipate that the JRP will begin receiving IRs on an ongoing basis. With limited administrative resources - this will be the case for all of the public intervenors, to my knowledge - it is important that we have a system in place in the early days of the Review which allows us to track the IRs (and OPG updates and corrections) in a way that is efficient and effective, meaning that it does not require great investments of time (such as re-keying all of the IRs into a searchable/sortable format would require) and allows participants, experts retained by public participants, and other interested parties to readily track OPG responses and updates as they pertain to and <u>change</u> the Project proposal as submitted by OPG almost a year ago.

Related to that need, we have the following questions:

- does the Secretariat have in place a system for tracking IRs and responses?

- is that system sortable and searchable?
- can that system be shared with public participants?

In the alternative, if the answer to any or all of the above questions is in the negative: - does OPG provide their responses in a format which is searchable and sortable? (excel, Word, etc.)

- if so, could CEAA provide us with those responses in that format, or must we request them from OPG?

Thank you for your assistance with this, Debra. I appreciate that this is a busy time for the Secretariat, but I also know that you recognize the value of public participation, and will understand how these challenges in tracking information can directly affect our ability to participate most effectively and so contribute to the Review process. Your responses to the above questions, even in advance of a formal reply from the JRP to our letter of 23 January 2012, will assist us in establishing our own information and communication systems for this review process.

Regards,

Brennain

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