

NORTHWATCH

June 14, 2012

Dr. Stella Swanson, Panel Chair
Deep Geologic Repository Project Joint Review Panel
Canadian Environmental Assessment Agency
160 Elgin St., 22nd Floor
Ottawa ON K1A 0H3

Email: DGR.Review@ceaa-acee.gc.ca

Dear Dr. Swanson:

Re. Site Visits and Private Interactions between Joint Review Panel and Proponent

On January 24th, 2012 we wrote to offer our congratulations on your appointment to the Joint Review Panel for the review of Ontario Power Generation's proposed deep geological repository for the placement of low and intermediate level radioactive waste, and to identify three important procedural matters for this review, including the matter of site visits and how they are conducted.

As we outlined in our earlier letter, we appreciate that it is a common practice of hearing panels to visit the site of a proposed project, and we note that the Joint Review Panel has expressed interest in a number of site visits, including potential visits to international facilities. However, we have a concern about any occasion in which the Joint Review Panel is interacting with the proponent and / or the proponent's consultants and employees outside of the public record, including during site visits.

Our concern is heightened by what we have learned of the Joint Review Panel's visit to the Bruce Nuclear Generating Station and proposed site for the Deep Geological Repository for radioactive wastes which we understand was to have taken place on June 7th. Our concerns are several:

- There was no notice provided through the public registry in advance of the site visit
- No information has been provided about the agenda or itinerary for the visit, the evidence presented by OPG or their consultants, or the information provided
- There is no record of the discussions between the Joint Review Panel and the proponent or their agents or others who may have been include in the site visit
- There is no record of the Joint Review Panel's findings

The absence of any notice for this site visit raises a question as to whether, how or when the site visit even having taken place would have been disclosed had the Saugeen Ojibway Nation not written to the Joint Review Panel to express their concerns about the visit to the burial grounds of their Ancestors, the Jiibegmegoong.

We have the following questions, which have assumed a more urgent nature under the circumstances:

1. *Can we expect that a record will be produced the Joint Review Panel's site visit to the Bruce Nuclear Generating Station, which we understand took place on June 7th?*
2. *Can we expect that a record will be produced of any interactions between Panel members and the proponent and/or their representatives, including during any future site visits?*
3. *Can we expect advance notice of any future site visits?*
4. *Will Public participants in the review process be given the opportunity to participate in any future site visits?*

Thank you again for your consideration. As I am sure you can understand, having these matters resolved are important to public confidence in the review process, and to our ability to participate to the best of our ability. We look forward to your response.

Sincerely,

<original signed by>

Brennain Lloyd
Northwatch

cc. Dr. James F. Archibald, Panel Member
Dr. Gunter Muecke, Panel Member