NORTHWATCH

June 29th, 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. **Information Requests from Northwatch Related to Ontario Power Generation's Proposed Deep Geological Repository for Radioactive Wastes – International Experience**

Please find attached Northwatch's third set of Information Requests. These requests have been prepared by consultants who are supporting Northwatch's review of the Ontario Power Generation's proposal to construct a deep geological repository for low and intermediate level radioactive wastes at the Bruce Nuclear Generating Station and largely relate to international experience with deep geological repositories for radioactive waste management, and how relevant international experience has been considered and presented by Ontario Power Generation in their Environmental Impact Statement and supporting documents and during the development of their proposal for a DGR for low and intermediate level wastes. We anticipate forwarding additional Information Requests in the near future.

As is the case with information requests previously submitted by Northwatch, our experts have indicated that responses to these Information Requests are necessary to their review of the EIS and Technical Support Documents and subsequently to their preparation of reports on our behalf, as part of this review process. This includes Northwatch's report on the conformity of the EIS with the EIS guidelines.

Thank you for your attention and consideration.

Sincerely,

<original signed by>

Brennain Lloyd
Northwatch

c.c. Dr. James F. Archibald, Panel Member
Dr. Gunter Muecke, Panel Member
Ms. Debra Myles, Panel Co-Manager, CEAA
Ms. Kelly McGee, Panel Co-Manager, CNSC

Northwatch Information Requests – Submitted June 28th, 2012

Northwatch Question No.	EIS Guidelines[1] Section	EIS Section or other TSD	Information Request	Rationale
26	2.5 Precautionary Approach 2.6 Strategy and Methodology 2.7 Use of existing information	EIS Section 3 Project Description, regarding international experience of technical suitability on page 3-1.	Please explain why some relevant international experience is not discussed, including at Morsleben and Asse disposal sites in Germany.	Para 2.5 of the EIS Guidelines states the Precautionary Principle informs the decision-maker to take a cautionary approach, or to err on the side of caution, especially where there is a large degree of uncertainty or high risk. Para 2.6 of the EIS Guidelies states that all environmental impacts should be identified and that the information presented must be substantiated. Para 2.7 of the EIS Guidelines states that the proponent is encouraged to make use of existing information relevant to the project.
27	2.5 Precautionary Approach 2.6 Strategy and Methodology 2.7 Use of existing information	EIS Section 3.2.4 Decision by Kincardine regarding deep rock vault as best international practice on page 3-7.	Please explain how the experience at Morsleben and Asse disposal sites at similar depths to DGR, though in a different rock type, was included in information provided to or considered by the Municipality of Kincardine as it considered the option of a deep geological repository.	Para 2.5 of the EIS Guidelines says the Precautionary Principle informs taking a cautionary approach, or to err on the side of caution, especially where there is a large degree of uncertainty or high risk. Para 2.6 of the EIS Guidelies states that all environmental impacts should be identified and that the information presented must be substantiated. Para 2.7 of the EIS Guidelines states that the proponent is encouraged to make use of existing information relevant to the project.
28	2.7 Use of existing information	EIS Section 3.3 Deep Rock Vaults regarding the Loviisa facility beginning operations in early 1997 on page 3-10.	Please explain the source of the information about the Loviisa facility. Please explain the discrepancy in the operation date, which the Finnish government states is 1998.	Para 2.7 of the EIS Guidelines states that the proponent is encouraged to make use of existing information relevant to the project. In the case of the Loviisa facility, the proponents may not have used the best available information. See, for example: **http://www.stuk.fi/julkaisut/stuk-b/stuk-b138.pdf**
29	2.7 Use of existing information 8.1 General and Design information	EIS Table 3.4.10-2 - Examples of Waste Conditioning and Containers Used Internationally	Please explain why containers used at operating international sites at Loviisa in Finland and Morsleben and Asse in Germany are not identified.	Para 2.7 of the EIS Guidelines states that the proponent is encouraged to make use of existing information relevant to the project. Para 8.1 states that waste containers/packages and their performance and longevity with respect to their containment function, including reference to applicable international experience should be presented.
30	13.2 Selection of Assessment Scenarios	Preliminary Safety Report (PSR) (overarching document) Section 8.6.1 regarding shaft seals, page 491 of 768.	Please explain why the DGR shaft seal design is similar to WIPP, when no actual shaft seals exist at WIPP and the bedded salt rock type is different than DGR.	Para 13.2 of the EIS Guidelines includes the need for long-term assessments, for which shaft seals would be a relevant consideration. In light of WIPP's shaft seal system has not been used, the proponents should explain its applicability.
31	13.2 Selection of Assessment Scenarios	Preliminary Safety Report (PSR) (overarching document) Section 14.2 and Table 14-1, page 671 of 768.	Please explain why Konrad is relevant since it is not operating, while Morsleben and Asse	Para 13.2 of the EIS Guidelines includes discussion of disruptive events and scenarios. Such scenarios should include how existing facilities have been disupted and why those actual scenarios are or are not

[1] http://www.ceaa-acee.gc.ca/050/documents/31039/31039E.pdf

			disposal sites, which have operated, are not mentioned	relevant to DGR.
32	13.2 Selection of Assessment Scenarios	Preliminary Safety Report (PSR) (overarching document) Section 14.2, regarding WIPP as particularly relevent, page 671 of 768.	Please explain why WIPP is particularly relevant, given that it is situated in a different rock type, and receivesdifferent wastes.	Para 13.2 of the EIS Guidelines includes use of safety assessment information. The determination that WIPP is particularly relevant should be explained and justified.
33	13.2 Selection of Assessment Scenarios	Preliminary Safety Report (PSR) (overarching document) Section 14.2, regarding WIPP as operating until 2070, page 671 of 768.	Please explain the basis for the statement that WIPP is expected to operate until 2070, when its New Mexico permit states that it is expected to cease in about 2024 and facility closure would be expected by 2034.	The proponents apparently have not used the best available information. See, for example, page G-7 of the New Mexico state permit - **http://www.wipp.energy.gov/library/Information_Repository_A/Searchable_Permit_5-8-12.pdf**