

**APM-REG-00532-0232**

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May 8, 2026

**Ms. Candida Cianci**

Director, Review Panels  
Impact Assessment Agency of Canada

**Mr. John Thelen**

Director, Wastes and Decommissioning Division  
Canadian Nuclear Safety Commission

**RE:** Start of the Public Comment Period on the draft Integrated Tailored Impact Statement Guidelines and Public Participation Plan for the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

Dear Ms. Cianci and Mr. Thelen:

The purpose of this letter is to provide the Nuclear Waste Management Organization (NWMO)'s comments on the draft Integrated Tailored Impact Statement Guidelines (TISGs), and the draft Public Participation Plan, developed by the Impact Assessment Agency of Canada (IAAC) in collaboration with the Canadian Nuclear Safety Commission (CNSC), for the proposed NWMO Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel, in accordance with Reference 1.

Please find the NWMO's comments on the Integrated Tailored Impact Statement Guidelines and the Draft Public Participation Plan in Enclosure 1.

If you require further information or have any questions regarding this submission, please contact Kiza Sauvé, Manager, Regulatory Affairs, NWMO.

<Original signed by>

Sincerely,  
Karine Glenn  
Director, Regulatory Affairs  
Nuclear Waste Management Organization

cc: CNSC Forms / Formulaire  
Robert Buhr, CNSC - Ottawa  
Courtney Robichaud, CNSC - Ottawa  
Kathryn MacCarthy, IAAC - Ottawa

Enclosure:

1. The Nuclear Waste Management Organization's Comments on the draft Integrated Tailored Impact Statement Guidelines and the Draft Public Participation Plan

References:

1. Start of the Public Comment Period on the draft Integrated Tailored Impact Statement Guidelines and Public Participation Plan for the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project, April 10, 2026, APM-REG-00532-0233

## **Enclosure 1 – The Nuclear Waste Management Organization’s Comments on the Draft Integrated Tailored Impact Statement Guidelines and the Draft Public Participation Plan**

### **Introduction**

The Nuclear Waste Management Organization (NWMO) is the organization established under the *Nuclear Fuel Waste Act* to develop and implement Canada’s plan for the long-term management of used nuclear fuel. The NWMO is proposing a Deep Geological Repository (DGR) Project that would provide a long-term, passive means to safely contain and isolate used nuclear fuel deep underground in a suitable rock formation, together with the associated surface facilities and supporting infrastructure required to receive, package/handle, and emplace used fuel for long-term containment.

After more than a decade of technical and community-based siting work, the Project site was selected in the Wabigoon Lake Ojibway Nation (WLON) and Township of Ignace area of northwestern Ontario, approximately 21 km southeast of Wabigoon Lake Ojibway Nation and 43 km northwest of the Township of Ignace along Highway 17. The Project is intended to provide long-term management for Canada’s inventory of used nuclear fuel (approximately 5.9 million used fuel bundles) and would be developed and implemented over a long lifecycle that includes site preparation, construction, operation, and closure/monitoring.

The draft Integrated Tailored Impact Statement Guidelines (TISGS) and the draft Public Participation Plan set out the information requirements and participation approach that will inform the Integrated Impact Assessment to be conducted by the Impact Assessment Agency of Canada (IAAC), in collaboration with the Canadian Nuclear Safety Commission (CNSC). This Enclosure provides the NWMO’s detailed comment table on the draft documents, with the objective of supporting clear, consistent, and implementable information requirements for the Impact Statement, and a participation framework that is transparent and workable. At this stage, NWMO’s comments on the Draft Public Participation Plan are limited to proposing a clarification related to future CNSC licensing decisions.

### **Summary of themes**

The NWMO’s comments are organized around the following overarching themes. The specific comments listed as examples below are illustrative only and are not intended to be an exhaustive list.

**Valued component (VC)-specific spatial and temporal scoping.** The NWMO recommends that the proponent define the intended spatial and temporal scopes for each study, including clarifying study areas, the geographic extent of transportation-related requirements, and temporal boundaries for analysis, as well as using consistent well-defined nomenclature, so requests are commensurate and feasible with the assessment scope and decision needs. This direction should be clear that spatial and temporal boundaries are VC-specific and should be defined by the proponent and justified based on the nature of each VC and relevant effects pathways (e.g., NWMO-TISGS-5, NWMO-TISGS-8, NWMO-TISGS-14, NWMO-TISGS-17, NWMO-TISGS-19, NWMO-TISGS-23).

**VCs, intermediate components, and effects pathways.** The NWMO recommends clarifying the treatment of VCs, intermediate components, and effects pathways, including distinguishing ultimate receptors/VCs from intermediate components within pathways, and aligning characterization and significance determinations accordingly. This supports a clear effects-pathway approach and helps ensure significance conclusions are applied appropriately and consistently (e.g., NWMO-TISGS-2, NWMO-TISGS-7).

**Indigenous engagement and Indigenous Knowledge.** The NWMO requests clear, respectful, and workable direction for Indigenous engagement and the use of Indigenous Knowledge, including documenting engagement efforts and community preferences, and transparently describing how Indigenous Knowledge is

considered where information-sharing consent is not provided, including any resulting limitations and how they are addressed. Clear direction supports respectful engagement and transparency in the Impact Statement while recognizing that approaches may differ among Indigenous Nations and communities (e.g., NWMO-TISGS-16, NWMO-TISGS-32, NWMO-TISGS-33, NWMO-TISGS-34, NWMO-TISGS-36, NWMO-TISGS-39).

**Clarity, consistency, and usability of requirements.** The NWMO recommends that information requirements be clear, consistent throughout the TISGs, and easy to apply, including by correcting cross-references, aligning terminology, and refining wording where needed to reduce ambiguity and improve usability. Clear requirements support efficient planning and help ensure information needs are interpreted consistently throughout the assessment (e.g., NWMO-TISGS-3, NWMO-TISGS-10, NWMO-TISGS-35).

**Feasible, evidence-based, and sensitive information requests.** The NWMO recommends that information requests be feasible, evidence-based, and sensitive to the nature of the information, including ensuring requirements are clearly defined and within the proponent's ability to provide, while recognizing sensitivities and supporting conclusions with appropriate evidence. Feasible, well-defined requests support timely completion of the Impact Statement and improve the quality and comparability of information (e.g., NWMO-TISGS-18, NWMO-TISGS-25, NWMO-TISGS-26, NWMO-TISGS-27, NWMO-TISGS-28, NWMO-TISGS-29, NWMO-TISGS-30, NWMO-TISGS-31).

**Regulatory certainty and stable reference points.** The NWMO requests stable reference points, including identifying the applicable versions/dates of referenced guidance and CNSC documents (where relevant), so expectations remain traceable and predictable during the assessment process. Fixed reference points support transparency and traceability for reviewers, proponents and participants (e.g., NWMO-TISGS-1, NWMO-TISGS-47).

**Effects language that does not pre-judge outcomes.** The NWMO recommends using language that does not pre-judge outcomes of effects assessments, including consistently framing requirements in terms of assessing and characterizing **potential** effects (and residual effects), rather than presuming effects prior to analysis. This supports a neutral, evidence-based process that characterizes effects after analysis and mitigation are considered (e.g., NWMO-TISGS-4, NWMO-TISGS-6, NWMO-TISGS-7).

The NWMO appreciates the opportunity to provide comments on the draft Tailored Impact Statement Guidelines and the draft Public Participation Plan. The NWMO's detailed comment table follows this summary section and is provided to support the development of clear, consistent, and implementable information requirements for the Impact Statement, and a participation framework that is transparent and workable.

**Enclosure 1 – Comment Tables**

Table 1 – The NWMO’s Comments on the Draft Public Participation Plan

Comment Number	Line in PPP / Reference	Current PPP Text (verbatim)	Update Text Proposed by NWMO	Rationale
NWMO-PPP-1	Draft PPP, p.7	The proponent may pursue subsequent licences to construct, operate, decommission at later stages, should the project be approved.	The proponent may pursue subsequent licences to construct, operate, decommission at later stages <b>directly through the CNSC</b> , should the project be approved.	Need to clarify that future licensing decisions will not be made by the Review Panel but rather by the Commission

Table 2 – The NWMO’s Comments on the Draft TISGs

Comment Number	Line in TISGs / Reference	Current TISGs Requirement Text (verbatim)	Update Text Proposed by NWMO  NWMO’s proposed wording or comment (additions in <b>bold</b> ; deletions shown as <del>strike-through</del> )	Rationale
NWMO-TISGS-1	1.2 Selection of Valued Components  Line 131	The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the <a href="#">Generic Requirements for Impact Statements</a> , which outlines the steps that must be applied to the assessment of each VC.	The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements ( <b>dated April 2025, interim version</b> ), which outlines the steps that must be applied to the assessment of each VC.	The NWMO requests a “freeze date” for the Generic Requirements to ensure alignment and understanding for all participants for the requirements for the Integrated Impact Assessment. The NWMO notes that the links in the current DRAFT TISGs most often link to the IAAC website (which has a date of August 2025), whereas the linked version of the Draft TISGs has a date of April 2025. It is important, for regulatory certainty that the specific version of the Generic TISGs is noted.
NWMO-TISGS-2	1.2 Selection of Valued Components, Line 133	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated	Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC. The VCs must be assessed following the requirements presented in these Integrated Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact	The suggested <b>bolded</b> text acknowledges that some of the environmental components listed as valued components in Section 1.2 could be considered intermediate components.  Intermediate components include physical attributes or media on which VCs depend and would include the physical environment components listed in the Table presented in Section 1.2 of the Guidelines. Table 19-1 of the Initial Project Description provides suggested intermediate components and valued components for the assessment of federal

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		Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements, which outlines the steps that must be applied to the assessment of each VC. The Impact Statement must include, at minimum, the following VCs:	Statements, which outlines the steps that must be applied to the assessment of each VC.  <b>The Integrated Guidelines, in Sections 5, 6, 7 and 8, provide information requirements organized in categories that may be considered as VCs, or may be considered as intermediate components in the effects pathway to inform the assessment of VCs, depending on the project. The VCs will help organize the description of the potential effects of the project required by the Integrated Guidelines.</b> The Impact Statement must include, at minimum, the following VCs <b>or intermediate components</b> :	effects. Intermediate components are identified and assessed using the same process described for VCs; however, they are not assessed for significance, as the significance of changes in intermediate components can only be evaluated in the context of related influences to VCs, which are the ultimate receptors. It is also recognized that selected VCs are those anticipated to be material for decision making under the IAA.  The suggested text addition recognizing intermediate components has been included in other Integrated Tailored Impact Statement Guidelines for Nuclear Projects, including the Bruce C Nuclear Project (Section 7.3) and Peace River Nuclear Power Project (Section 7.3).
NWMO-TISGS-3	1.2 Selection of Valued Components  Line 133 (Table – Biological Environment)	Project-related activities such as site preparation and construction, blasting, in-water works, water intake, dewatering, effluent discharge, deposition of deleterious substances, sensory disturbances could result in <b>adverse effects</b> to the biological environment.	Project-related activities such as site preparation and construction, blasting, in-water works, water intake, dewatering, effluent  discharge, deposition of deleterious substances, sensory disturbances could result in <b>impacts</b> to the biological environment.	Revised language for consistency with the rest of the table.

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NWMO-TISGS-4	1.3 Preparing the Impact Statement  Line 163	As applicable, the proponent is also encouraged to refer to the requirements of  other jurisdictions to assess effects, as well as to means of other jurisdictions to address effects of the project and to report in the Impact Statement how these were leveraged to assess effects	As applicable, the proponent is also encouraged to refer to the requirements of  other jurisdictions to assess <b>potential</b> effects, as well as to means of other jurisdictions to address effects of the project and to report in the Impact Statement how these were leveraged to assess effects	There should not be presumptions of effects; they are potential effects being assessed to determine if they will become a predicted residual effect.
NWMO-TISGS-5	2.2 Project components and activities  Line 248-251	<ul style="list-style-type: none"> <li>in addition to those listed in the Initial Project Description, transportation of both nuclear and non-nuclear materials outside of the project site, including the construction activities associated with infrastructure upgrades, must be included within the list of project components and activities (as specified in Section 4 Assessment Methodology) considered within the Impact Statement;</li> </ul>	<ul style="list-style-type: none"> <li>in addition to those listed in the Initial Project Description, transportation of both nuclear and non-nuclear materials outside of the project site <b>within the geographic extent scoped in section 4</b>, including the construction activities associated with infrastructure upgrades, must be included within the list of project components and activities (as specified in Section 4 Assessment Methodology) considered within the Impact Statement;</li> </ul>	Provide greater clarity earlier in the text as to the geographic scope of the activities.
NWMO-TISGS-6	2.2 Project components and activities  Line 254	identify activities that involve periods of increased disturbance to adverse federal effects, and impacts on Indigenous Nations and communities and their rights;	identify activities that involve periods that could result in increased disturbance resulting in potential adverse federal effects, including <b>potential</b> impacts on Indigenous Nations and communities and their rights;	There should not be presumptions of effects; they are potential effects being assessed to determine if they will become a predicted residual effect.

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NWMO-TISGS-7	2.2 Project components and activities  Line 258	identify likely effect pathways between project components and activities and VCs in sufficient detail to support the assessment of effects on VCs and their interactions;	identify likely effect pathways between project components and activities and VCs in sufficient  detail to support the assessment of <b>potential</b> effects on VCs and their interactions;	There should not be presumptions of effects; they are potential effects being assessed to determine if they will become a predicted residual effect.
NWMO-TISGS-8	2.3.4 – Alternative Means of Carrying out the Project (Line 303)	<ul style="list-style-type: none"> <li>route or corridor and means options for transportation,</li> </ul>	<ul style="list-style-type: none"> <li>route or corridor and means options for transportation, <b>limited to the geographic extent described in Section 4, encompassing the railway spur for rail transport to the project site, and the Highway 17 turn-offs associated with road transport to the project site</b></li> </ul>	Text added to clarify the limit to geographic extent of new construction of access roads / rail spur. Alternatives routes for transportation of used nuclear fuel within established transportation corridors are outside the scope of the assessment and constitute prescribed security information that cannot be discussed publicly.
NWMO-TISGS-9	2.3.4 – Alternative Means of Carrying out the Project (Lines 303 to 306, 320 to 322)	<ul style="list-style-type: none"> <li>width of the right-of-way,</li> <li>project component locations,</li> <li>access to the project site,</li> <li>construction alternatives;</li> <li>location, construction and crossing methods for waterbodies, watercourses, wetlands and other obstacles;</li> </ul>	<ul style="list-style-type: none"> <li><del>width of the right-of-way,</del></li> <li><del>project component locations,</del></li> <li><del>access to the project site,</del></li> <li><del>construction alternatives;</del></li> <li><del>location, construction and crossing methods for waterbodies, watercourses, wetlands and other obstacles;</del></li> </ul>	These items are already captured in the assessment of alternative access routes/corridors and transmission line alignments (including defined right-of-way widths) and, as part of that analysis, consideration of waterbody/watercourse crossings, wetlands, and other sensitive features. Likewise, “construction alternatives” and “project component locations” are addressed through the alternative means analysis for

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				<p>transportation and linear components, together with other project elements (e.g., phase timing, energy supply, workforce accommodation, water/wastewater, and excavated materials management).</p> <p>In addition, the key project elements of "Construction alternatives" and "Project Components locations" are redundant with other key project elements listed that would assess alternative Project component locations and construction methods for their implementation</p>
NWMO-TISGS-10	2.3.4 – Alternative Means of Carrying out the Project (Line 309)	<ul style="list-style-type: none"> <li>facility design (e.g., vertical shafts, used fuel processing plant),</li> </ul>	<ul style="list-style-type: none"> <li>facility design (e.g., vertical shafts, used fuel <b>processing packaging</b> plant)</li> </ul>	The Used Fuel Packaging Plant name needs to be updated.
NWMO-TISGS-11	2.3.4 – Alternative Means of Carrying out the Project (Line 310)	<ul style="list-style-type: none"> <li>potential for the used nuclear fuel to be retrieved in the future</li> </ul>	<ul style="list-style-type: none"> <li><del>potential for the used nuclear fuel to be retrieved in the future</del></li> </ul>	As outlined in the Alternatives To section of the IPD, the long-term plan as accepted by Government of Canada requires that the used nuclear fuel be retrievable until the end of the pre-closure phase. The retrieval process will become progressively more demanding as used fuel containers are sealed in placement rooms, as well as years later, when the access tunnels and shafts are backfilled

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				and sealed. In the post-closure phase, retrieval will no longer be an option, unless under exceptional circumstances.
NWMO-TISGS-12	2.3.4 – Alternative Means of Carrying out the Project (Line 319)	<ul style="list-style-type: none"> <li>low and intermediate level radioactive waste</li> </ul>	<ul style="list-style-type: none"> <li><b>onsite temporary storage of</b> low and intermediate level radioactive waste</li> </ul>	The NWMO is required to adhere to the direction provided in Canada's Integrated Strategy for Radioactive Waste for the long-term management of ILW therefore options should not be considered as part of this Project, which only encompasses storage.
NWMO-TISGS-13	2.3.4 – Alternative Means of Carrying out the Project (Line 325)	<ul style="list-style-type: none"> <li>suspension, abandonment or decommissioning options</li> </ul>	<ul style="list-style-type: none"> <li><del>suspension, abandonment or decommissioning options</del></li> </ul>	<p>As required in REGDOC-1.2.3, the NWMO will develop and submit an Initial Licence application to the CNSC. This will include a preliminary decommissioning plan in accordance with REGDOC-2.11.2. There are significant engagement requirements for the decommissioning plans as well. The preliminary decommissioning plan will be updated on a 5-year cycle as per CNSC licensing requirements.</p> <p>Prior to the execution of decommissioning, the NWMO would submit a detailed decommissioning plan to the CNSC for acceptance. The DDP shall document the decommissioning strategy; decontamination, dismantling and/or clean-up activities; final end-state</p>

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				objectives; the principle hazards and protection plans; a waste management plan; a cost estimate; and financial guarantee arrangements. Once accepted by CNSC staff, the DDP will be incorporated into a licence authorizing decommissioning.
NWMO-TISGS-14	4 – Assessment Methodology  (lines 385-386)	<ul style="list-style-type: none"> <li>temporal boundaries for the assessment should consider, where applicable, the total time frame of the project, which is nominally one million years (with a pre-closure phase that includes site preparation, construction, operation and decommissioning, lasting a few hundred years, and a post-closure phase that lasts one million years);</li> </ul>	<ul style="list-style-type: none"> <li>temporal boundaries for the assessment should consider, where applicable, the total time frame of the project, which is nominally 160 <del>one million</del> years (with a pre-closure phase that includes site preparation, construction and operation <b>and decommissioning and closure</b>; <del>lasting a few hundred years, and a post-closure phase that lasts one million years</del>);</li> </ul>	<p>The NWMO understands that the wording for “should consider” and “where applicable” is important in this sentence.</p> <p>The NWMO suggests that the presentation of the million year time frame of the project in the temporal boundaries section is inconsistent with the intended application. Valued Components will be assessed through the approximately 160 years of site preparation, construction, operation, decommissioning and closure. IAAC has already identified sections 9 and 11 as requiring consideration of expanded timeframes:</p> <p>Effects of Potential Accidents or Malfunctions (Section 9) includes existing text in line 2047 “<i>identify and justify the spatial and temporal boundaries for the effects assessment associated with accidents and malfunctions.</i>”</p>

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				<p>Effects of the Environment on the Project (Section 11, Line 2211) includes <i>“The proponent should focus on credible near and far future events that have a reasonable probability of occurring and could lead to adverse impacts without appropriate management”</i></p> <p>In accordance with REGDOC-1.2.3, the NWMO will develop and submit an Initial Licence Application to the CNSC that includes a post-closure safety assessment that provides a systematic quantitative analysis of the evolution of the disposal system and its environment, possible disruptive events, and the potential resulting radiological and non-radiological impacts on people and the environment, in accordance with REGDOC 2.11.1, Waste Management, Volume III: Safety Case for the Disposal of Radioactive Waste, Version 2.</p> <p>Therefore, the NWMO recommends that the temporal boundary should be noted nominally as 160 years.</p>

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NWMO-TISGS-15	4. Assessment Methodology  Line 389-392	assess the project's likely cumulative effects in relation to the ability of Indigenous Nations and communities to exercise their rights. The proponent should work with Indigenous Nations and communities to determine which sections within the Impact Statement this assessment is best suited to be included in.	assess the project's likely cumulative effects in relation to the ability of Indigenous Nations and communities to exercise their rights. <del>The proponent should work with Indigenous Nations and communities to determine which sections within the Impact Statement this assessment is best suited to be included in.</del>	The location of the cumulative effects assessment and Rights assessment in the Impact Statement (IS) will be informed by the IS methodology – there are multiple communities scoped into the IS and information needs to be presented consistently by NWMO.
NWMO-TISGS-16	4. Assessment Methodology  Line 394	define and apply criteria and relevant benchmarks with Indigenous Nations and communities, including but not limited to the description of effects on and mitigation for effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant.	define and apply criteria and relevant benchmarks to <b>include views and perspectives of</b> with Indigenous Nations and communities, including but not limited to the description of effects on and mitigation for effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation and community. These criteria should be applied to determine <b>Indigenous Peoples views and perspectives as to</b> the extent to which adverse effects on Indigenous Peoples are significant.	The language needs to provide equal opportunity for the proponent and each nation to provide their views and perspectives on appropriate criteria as well as the determination of significance.
NWMO-TISGS-17	5.6.2 Effects to groundwater and surface water	"....estimate key project fluxes, dewatering rates, and seepage rates during construction, operation <u>and the post-closure period,</u> "	"....estimate key project fluxes, dewatering rates, and seepage rates during construction and operation <b>and up to closure</b> <del>and the post-closure period,</del> "	Please refer to rationale for NWMO-TISGS-14.

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	Lines 829-830			
NWMO-TISGS-18	5.6.2 Effects to groundwater and surface water  839	"groundwater piezometric contours and <b>particle tracking</b> results;"	".....groundwater piezometric contours <b>and other quantitative modelling performance measures, for example but not limited to,</b> particle tracking results;"	Particle tracking may not be an appropriate model performance measure for certain hydrological modelling applications in low groundwater velocity environments, as it may not fully represent the effects of hydrodynamic dispersion. The requested revision would provide flexibility for the NWMO to apply modelling performance measures that are appropriate to the selected modelling approach and site conditions, rather than prescribing a single metric.
NWMO-TISGS-19	6.2.1 Baseline Conditions  Line 1015	surface water hydrology in the local study area (LSA) and regional study area (RSA) from on-site gauging stations, considering ice cover, freeze-thaw cycle and snow regime, flow hydrographs,  water levels and seasonal baseflow for streams and rivers, as well as stage hydrographs for lakes, including quantitative characterization of baseline	surface water hydrology in the local study area (LSA) <del>and regional study area (RSA)</del> from on-site gauging stations, considering ice cover, freeze-thaw cycle and snow regime, flow hydrographs,  water levels and seasonal baseflow for streams and rivers, as well as stage hydrographs for lakes, including quantitative characterization of baseline hydrology in a model detailing baseline surface water flows	This level of information is appropriate for the LSA only, where potential Project-related effects to fish and fish habitat could occur.

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		hydrology in a model detailing baseline surface water flows		
NWMO-TISGS-20	6.3 Birds and their habitat  Line 1116	description and maps of the location of areas important to birds (e.g., bird sanctuaries), and of residences and critical habitat for species at risk as defined in recovery strategies,	description and maps of the location of areas important to birds (e.g., bird sanctuaries), and of residences and critical habitat for species at risk as defined in recovery strategies under the <b>Species at Risk Act</b> ,	Addition of reference to the Species at Risk Act provides clarity on the source of the recovery strategy under federal law.
NWMO-TISGS-21	6.3 Birds and their habitat  Line 1146	describe residual and, if applicable, cumulative effects to birds resulting from the likely effect pathways to birds, including an estimate of effects resulting from habitat changes (e.g., degradation, removal) and of effects to species at risk critical habitat.	describe residual and, if applicable, cumulative effects to birds resulting from the likely effect pathways to birds, including an estimate of effects resulting from habitat changes (e.g., degradation, removal) and of effects to <del>species at risk</del> <b>critical habitat of species defined under Schedule 1 of the Species at Risk Act.</b>	Addition of reference to the Species at Risk Act provides clarity on how critical habitat is defined.
NWMO-TISGS-22	6.4 Terrestrial wildlife and their habitat  Line 1166	protected areas or sensitive habitats as described in <u>Sections 2.2 Project components and activities and 6.5 Species at risk and their habitat</u> ; species at risk critical habitat that has been designated or is under consideration,	protected areas or sensitive habitats as described in <u>Sections 2.2 Project components and activities and 6.5 Species at risk and their habitat</u> ; <del>species at risk</del> <b>critical habitat for species listed under Schedule 1 of the Species at Risk Act</b> that has been designated or is under consideration,	Addition of reference to the Species at Risk Act provides clarity on how critical habitat is defined

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NWMO-TISGS-23	7 – Human Environment  Line 1257-1268	<p>Section 7 of the Integrated Guidelines presents a holistic approach to the requirements for health, social, and economic conditions of those living in the project study area, including the following distinct groups to work with in completing the requirements in Section 7 of the Integrated Guidelines:</p> <ul style="list-style-type: none"> <li>• individuals living in the project study area, including Indigenous Peoples and members of the public (referred to collectively as local peoples);</li> <li>• broad populations living in the project study area (referred to as local communities); and</li> <li>• Indigenous Nations and communities.</li> </ul> <p>Unless noted otherwise, and where Indigenous Nations and communities have agreed to including the information in the Impact Statement, all requirements in Section 7 apply to the three groups listed above. For the Impact Statement, the goal of Section 7 is to collect relevant baseline</p>	<p>Section 7 of the Integrated Guidelines presents a holistic approach to the requirements for health, social, and economic conditions of those living in the <del>project</del> <b>local</b> study area, including the following distinct groups to work with in completing the requirements in Section 7 of the Integrated Guidelines:</p> <ul style="list-style-type: none"> <li>• individuals living in the <del>project</del> <b>local</b> study area, including Indigenous Peoples and members of the public (referred to collectively as local peoples);</li> <li>• broad populations living in the <del>project</del> <b>local</b> study area (referred to as local communities); <del>and</del></li> <li>• Indigenous Nations and communities <b>(listed in the IEPP)</b>.</li> </ul> <p>Unless noted otherwise, and where Indigenous Nations and communities have agreed to including the information in the Impact Statement, all requirements in Section 7 apply to the three groups listed above. For the Impact Statement, the goal of Section 7 is to collect relevant baseline information, conduct effects analysis and provide potential mitigation measures as a result of <del>local community</del> <b>and Indigenous</b> engagement efforts in the</p>	<p>Various study areas will be defined and differentiated by their spatial extent. These would include study areas such as the project area, the local area, and the regional area. The term used in this statement “project study area” does not appropriately describe the spatial extent of the people being described below. Given the areas listed are for local peoples, local communities, the study area described should be referred to as the local study area.</p>

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		information, conduct effects analysis and provide potential mitigation measures as a result of local community and Indigenous engagement efforts in the project study area. Collection of baseline data and effects analysis in Section 7 should consider health, social, and economic inequalities between Indigenous Nations and communities and local peoples.	<del>project</del> <b>local</b> study area. Collection of baseline data and effects analysis in Section 7 should consider health, social, and economic inequalities between Indigenous Nations and communities and local peoples.	
NWMO-TISGS-24	7. Human Environment  Line 1276-1280	The proponent should work with, at minimum, the Township of Ignace, City of Dryden, Municipality of Sioux Lookout, Municipality of Machin, Village of Wabigoon Local Services Board, Melgund Local Services 1277 Board, City of Kenora, Municipality of Red Lake, Township of Ear Falls, Township of Pickle Lake, Township of Sioux Narrows-Nestor Falls, and other self-identifying local communities, as well as local peoples, when fulfilling the requirements of Section 7.	The proponent should <b>consider, as applicable work with,</b> <del>at minimum,</del> the Township of Ignace, City of Dryden, Municipality of Sioux Lookout, Municipality of Machin, Village of Wabigoon Local Services Board, Melgund Local Services 1277 Board, City of Kenora, Municipality of Red Lake, Township of Ear Falls, Township of Pickle Lake, Township of Sioux Narrows-Nestor Falls, and other self-identifying <del>local</del> <b>regional</b> communities, as well as local peoples, when fulfilling the requirements of Section 7.	The area defined by these communities is much larger than what would typically be defined as a local study area, a determination normally required of the proponent on a component or study specific basis. The NWMO recommends removal of the specific names of communities and, if needed, refer to the area as the regional study area.
NWMO-TISGS-25	7.2.1 Baseline for Health Conditions	Develop community health profiles that describe the overall biophysical, social, and economic health of each	Develop community health profiles that describe the overall biophysical, social, and economic health of each Indigenous	The NWMO recognizes sensitivities around individual health data for individual communities.

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	Line 1322	Indigenous and local community. Health Profiles should include the CWB Index, consider psychosocial factors and be co-developed where possible.	and local <del>community</del> <b>area</b> . Health Profiles should include the CWB Index, consider psychosocial factors and be co-developed where possible.	Where possible the NWMO proposes to prepare the community health profiles for the Indigenous Nations and communities and the local areas near the project site. This includes, in some instances aggregated data inclusive of Indigenous communities within the local area.
NWMO-TISGS-26	7.2 Baseline for Health Conditions  Line 1360	describe the level of food security and food sovereignty within Indigenous Nations and communities and local communities;	describe the level of food security <del>and food sovereignty</del> within Indigenous Nations and communities and local communities;	The term “food sovereignty” is not defined in the Guidelines and is subject to interpretation; IAAC should clarify the intended definition and assessment expectations, or remove the term to ensure the requirement is clear and measurable.
NWMO-TISGS-27	7.2.2 Effects of health conditions  Lines 1390, 1435, 1553	document and take into account tolerance thresholds for potential adverse effects on health identified by Indigenous Nations and communities and local peoples and communities;	document and take into account tolerance thresholds for potential adverse effects on health <b>if they differ from regulatory guidelines</b> <del>identified by Indigenous Nations and communities and local peoples and communities;</del>	A tolerance level suggests a perception of effects if they differ from published regulatory guidance regarding biophysical determinants of health. Lack of clarity as to what a “tolerance threshold” is and how it could be measured.
NWMO-TISGS-28	Line 1539-1541	Describe and evaluate the capacity of local governments and Indigenous communities to collaborate with levels of	<del>Describe and evaluate the capacity of local governments and Indigenous communities to collaborate with levels of</del>	The NWMO cannot assess a First Nation's or local government's capacity to

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		government to secure funding for upgrades to local services/infrastructure.	<del>government to secure funding for upgrades to local services/infrastructure.</del>	collaborate with other levels of government.
NWMO-TISGS-29	7.4.2.2 Effects on economics and economic participation  Line 1664	include a description of effects on Indigenous Nations and communities' ability to manage or improve social and economic conditions including in relation to engaging in traditional and other economic activities;	<del>include a description of effects on Indigenous Nations and communities' ability to manage or improve social and economic conditions including in relation to engaging in traditional and other economic activities;</del>	The NWMO cannot assess a First Nation's ability to manage their social and economic conditions.
NWMO-TISGS-30	7.4.2.2 Effects on economics and economic participation  Line 1667	Describe Indigenous economic participation in the project (e.g., number of workers), including; <ul style="list-style-type: none"> <li>• studies involving socio-economic projections including workforce and population must be completed collaboratively with Indigenous Nations and communities;</li> <li>• collaboration with Indigenous Nations and communities to develop training, employment and procurement strategies with priority for members of, and businesses owned by members of Indigenous Nations and communities;</li> </ul>	Describe Indigenous economic participation in the project (e.g., number of workers), including; <ul style="list-style-type: none"> <li>• studies involving socio-economic projections including workforce and population <b>should be</b> <del>must be</del> completed collaboratively with Indigenous Nations and communities <b>where feasible</b>;</li> <li>• collaboration with Indigenous Nations and communities to develop training, employment and procurement strategies with priority for members of, and businesses owned by members of Indigenous Nations and communities;</li> <li>• outline the elements, where appropriate, of any Indigenous Nation and community-specific benefit plans, including economic development,</li> </ul>	The NWMO must be able to complete socio-economic projections, even in the event that Indigenous Nations and communities do not want to participate.

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		<ul style="list-style-type: none"> <li>outline the elements, where appropriate, of any Indigenous Nation and community-specific benefit plans, including economic development, whether through an agreement or otherwise.</li> </ul>	whether through an agreement or otherwise.	
NWMO-TISGS-31	7.5 Mitigation and enhancement measures for health, social, and economic conditions  Line 1704	any additional mitigation considered if the level of emissions from a particular project emission or effluent discharge is below or at the applicable limits. If a project-related change is substantial (even within established limits) as a result of local or regional circumstances, the proponent must provide additional mitigation to minimize pollution and risks to human health.	<del>any additional mitigation considered if the level of emissions from a particular project emission or effluent discharge is below or at the applicable limits. If a project-related change is substantial (even within established limits) as a result of local or regional circumstances, the proponent must provide additional mitigation to minimize pollution and risks to human health.</del>	Published regulatory guidelines are protective of human health. The NWMO requests deletion of this requirement unless clarity is provided on what is considered substantial.
NWMO-TISGS-32	8. Indigenous Nations and communities  Line 1769	The assessment of impacts on Indigenous Peoples and their rights must be done in collaboration with Indigenous Nations and communities as outlined in <a href="#">Description of engagement with Indigenous groups.</a>	The assessment of impacts on Indigenous Peoples and their rights <del>must</del> <b>should</b> be done in collaboration with Indigenous Nations and communities, <b>if feasible</b> , as outlined in <a href="#">Description of engagement with Indigenous groups.</a>	The NWMO must be able to complete the assessment of potential impacts from the project on Indigenous Peoples and their rights if Indigenous Nations and communities do not want to participate.

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NWMO-TISGS-33	8. Indigenous Nations and communities  Line 1771	Where relevant, the proponent must collaborate with Indigenous Nations and communities to incorporate information from or about them into the assessment of all VCs (e.g., biophysical VCs).	Where relevant, the proponent must collaborate with Indigenous Nations and communities to incorporate <b>Indigenous Knowledge</b> information from or about them into the assessment of all VCs (e.g., biophysical VCs).	Request to have the first sentence reworded to clearly state this this sentence is related to Indigenous Knowledge.
NWMO-TISGS-34	8. Indigenous Nations and communities  Line 1772-1776	The proponent must respect each Indigenous Nation or community's preferences for assessing impacts, and discuss with each Indigenous Nation or community whether it is appropriate for the proponent to provide its conclusions regarding (residual and cumulative) impacts on Indigenous Peoples and their rights. If an Indigenous Nation or community has provided their own conclusion, the proponent is not required to provide one.	The proponent must respect <b>and document</b> each Indigenous Nation or community's preferences for assessing impacts. <del>and discuss with each Indigenous Nation or community whether it is appropriate for the proponent to provide its conclusions regarding (residual and cumulative) impacts on Indigenous Peoples and their rights.</del> If an Indigenous Nation or community has provided their own conclusion, the proponent is not required to provide one. <b>Where findings differ between the proponent and Indigenous Nations and communities, the proponent should clearly present how both were considered in the Impact Statement.</b>	The NWMO must be able to complete the assessment of potential impacts from the project on Indigenous Peoples and their rights if Indigenous Nations and communities do not want to participate, or if there is a disagreement between the view and perspectives of the NWMO and the views and perspectives of an Indigenous Nation or community that cannot be resolved. Suggest language from Section 8.4.2 line 1957 be added to end of statement.
NWMO-TISGS-35	8. Indigenous Nations and communities	1912: 8.2.3 ...  1922: 8.2.4...	1912: 8.3.1....  1922: 8.3.2....	There is a typo in the numbering that needs to be corrected to ensure alignment for other references within the document.

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	Lines 1912 and 1922			
NWMO-TISGS-36	8.2.4 Effects to health, social and economic conditions of Indigenous Peoples  Line 1924	In addition to the requirements set out in Section 7 health, social and economic conditions, the Impact Statement must include a health impact assessment tailored to each of the Indigenous Nations and communities as listed in 3.1 of the <a href="#">IEPP</a> .	Note – this section should be 8.3.2  In addition to the requirements set out in Section 7 health, social and economic conditions, the Impact Statement must include a health impact assessment tailored to each of the Indigenous Nations and communities as listed in 3.1 of the IEPP <b>where participation and information-sharing consent is provided by the Indigenous Nation or community and information is provided at a level of detail to support a tailored health impact assessment.</b>	The Impact Statement must still address the health impact assessment requirements for each Indigenous Nation and community. Where participation or consent to share information is not available, the NWMO would complete the assessment using available information and clearly document engagement efforts and any limitations/data gaps.
NWMO-TISGS-37	8.4.2 Impacts on rights of Indigenous Peoples	document the project's impacts on the rights of Indigenous Peoples and their severity, considering links between resources, access, and experience, including	document the project's impacts on the rights of Indigenous Peoples and their <del>severity</del> <b>magnitude</b> , considering links between resources, access, and experience, including	Aligns with IAAC rights assessment terminology/criteria by focusing on the <i>magnitude</i> of impacts on rights (including residual and cumulative effects).

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	Line 1960			
NWMO-TISGS-38	8.4.2 Impacts on rights of Indigenous Peoples  Line 1987	describe how the assessments of impacts on Indigenous Peoples (including impacts on physical and cultural heritage, current use of lands and resources for traditional purposes, and the health, social, and economic conditions of Indigenous Peoples) were integrated into the assessment of impacts on Indigenous rights and considered in determining residual and cumulative impacts and their severity;	describe how the assessments of impacts on Indigenous Peoples (including impacts on physical and cultural heritage, current use of lands and resources for traditional purposes, and the health, social, and economic conditions of Indigenous Peoples) were integrated into the assessment of impacts on Indigenous rights and considered in determining residual and cumulative impacts and their <b>severity magnitude</b> ;	Aligns with IAAC rights assessment terminology/criteria by focusing on the <i>magnitude</i> of impacts on rights (including residual and cumulative effects).
NWMO-TISGS-39	8.4.2 Impacts on rights of Indigenous Peoples  Line 1989-1991	describe the methodology used and agreed to by Indigenous Nations and communities for assessing 1989 impacts on their rights, and include any Indigenous-led studies that were provided if permission has 1990 been obtained from the Indigenous Nation or community to include them; and	describe the methodology used <del>and agreed to by Indigenous Nations and communities</del> for assessing impacts on their rights, and include any Indigenous-led studies that were provided if permission has 1990 been obtained from the Indigenous Nation or community to include them; and	"Agreed to" implies confirmation that may not be available or feasible to obtain from all Indigenous Nations and communities; the Impact Statement requirements must still be met. The requirement should focus on documenting the methodology used, how input was sought/incorporated where provided, and any engagement limitations.
NWMO-TISGS-40	9 – Effects of Potential Accidents or Malfunctions	various degrees of barrier loss (e.g., container breach or failure, groundwater intrusion, corrosion,	various degrees of barrier loss ( <del>e.g., container breach or failure, groundwater intrusion, corrosion, incomplete sealing of boreholes, etc.</del> )	The list of examples for various degrees of barrier loss includes hazards that extend beyond the pre-closure phase of the project, and are outside the temporal

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	Line 2003-2004	incomplete sealing of boreholes, etc.)		boundaries of the assessment. It is recommended to remove the list of examples so that the proponent may identify relevant hazards.
NWMO-TISGS-41	9. Effects of Potential Accidents or Malfunctions  Line 2006-2007	Accidents would include those associated with human error such as:  • improper operation of equipment (both at the project site and during transportation); or	Accidents would include those associated with human error such as:  • improper operation of equipment (both at the project site and during transportation <b>as scoped in section 4</b> ); or	The assessment of potential impacts of project-related transportation activities is limited to a geographic extent that includes, the geographic bounding encompassing the railway spur for rail transport to the project site, and the Highway 17 turn-offs associated with road transport to the project site. This extends to the assessment of Effects of Potential Accidents of Malfunctions.
NWMO-TISGS-43	9.1 Risk Assessment  Line 2032-2033	influence of local and regional terrain, topography and weather conditions (e.g., difficult access for interventions)	influence of local and regional terrain, topography and weather conditions ( <del>e.g., difficult access for interventions</del> )	The identification of malfunction or accident scenarios may consider interventions as part of scenario development. Interventions (or difficulty in accessing an intervention) is a part of the description of a scenario. Whereas, the influence of local and regional terrain, topography and weather conditions are more relevant to assessing the impact from the scenario, rather than developing the scenario to be assessed.  The example is not needed, as it is a component of the identified scenario.

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NWMO-TISGS-44	10 Planning for Transportation  Line 2120-2122	Transportation activities related to this project include increased traffic to the project during site preparation and construction as well as the transport of used nuclear fuel to the repository during the operation phase of the project.	Transportation activities related to this project include increased traffic to the project during site preparation and construction as well as the transport of used nuclear fuel to the repository during the operation phase of the project, <b>as scoped in section 4.</b>	Provides greater clarity in the text as to the geographic scope of the activities prior to participants reading Section 10.
NWMO-TISGS-45	10.2 Movement of materials and people  Line 2178-2185	The proponent will be expected to assess potential adverse effects within federal jurisdiction using a range of representative transportation scenarios that could reasonably occur as a result of increased movement of materials and workers to and from the project site (e.g., transportation near waterbodies, under adverse weather conditions, effects of climate change, or other credible situations that could influence the nature or severity of potential effects). These scenarios must be developed in consultation with TC, CNSC and IAAC. Considering these scenarios will allow the assessment to characterize the potential types and pathways of adverse effects that could arise from transportation activities in areas where such	The proponent will be expected to assess potential adverse effects within federal jurisdiction using a range of representative transportation scenarios that could reasonably occur as a result of increased movement of materials and workers to and from the project site (e.g., transportation near waterbodies, under adverse weather conditions, effects of climate change, or other credible situations that could influence the nature or severity of potential effects). <del>These scenarios must be developed in consultation with TC, CNSC and IAAC.</del> Considering these scenarios will allow the assessment to characterize the potential types and pathways of adverse effects that could arise from transportation activities in areas where such effects may reasonably occur within federal jurisdiction.	This section applies to the movement of people and materials (non-nuclear). The CNSC does not regulate the movement of non-nuclear materials or people to and from the project site and TC's oversight is focused on dangerous goods. The proponent should be responsible for developing applicable credible scenarios as is the case for the other aspects of effects assessments.

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		effects may reasonably occur within federal jurisdiction.		
NWMO-TISGS-46	12.2.1 Climate change commitments  Line 2327	assess the project's GHG emissions and emissions intensity as described in sections 3 and 5 of the SACC and section 2.1 and 2.5 of the Technical Guide;	assess the project's GHG emissions <del>and emissions intensity</del> as described in sections 3 and <b>5.1.1</b> of the SACC and section 2.1 and 2.5 of the Technical Guide;	<p>Suggest to remove the requirement to report the project's emission intensity. As per the SACC, emission intensity is based on net GHG emissions divided by units produced, where relevant. In the case of the project, there are no products and therefore an emission intensity is not relevant. The SACC section 3.1.2 also states that units will be specified in the Project TISG, and as they have to been specified this further support removal of 'emissions intensity'.</p> <p>Suggest to update the reference to Section 5, to 5.1.1, in the first bullet as Section 5 includes a list of additional information required, not exclusively related to assessing/quantifying GHGs. For clarity, Section 5.1.1 addresses the GHG emission aspect that aligns with sections 2.1 and 2.5 of the technical guide. Any required elements in Section 5 of the SACC should be moved to a separate bullet.</p>

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NWMO-TISGS-47	Appendix A – Applicable regulatory requirements	Regulatory documents listed:	Add publication date to each REGDOC.	Including the publication/version date (or “current as of” date) for each REGDOC provides a clear and stable reference point for the licence application review, avoiding ambiguity if CNSC REGDOCs are updated during the assessment process.
NWMO-TISGS-48	Appendix A Page 79 Statement and 4)	<p>The following regulatory documents apply for a licence to prepare site for a DGR facility.</p> <p>4)</p> <p>Regulatory Document REGDOC-2.2.2, Personnel Training, Version 2. This regulatory document applies to workers engaged in licensed activities in nuclear facilities or where nuclear substances or prescribed equipment are produced, used, possessed, packaged or disposed of.</p>	<p>The following regulatory documents apply for a licence to prepare site for a DGR facility.</p> <p>4)</p> <p><del>Regulatory Document REGDOC-2.2.2, Personnel Training, Version 2. This regulatory document applies to workers engaged in licensed activities in nuclear facilities or where nuclear substances or prescribed equipment are produced, used, possessed, packaged or disposed of.</del></p>	<p>Guidance is inconsistent. Align to Language stated in REGDOC 1.2.3 which includes the CSA standard, and not the REGDOC.</p> <p>Wording from REGDOC 1.2.3:</p> <p><i>For site preparation, human performance management, including worker training, is addressed under the management system SCA. This means that applicable worker training and human performance management provisions and considerations must be described in the management system. For information on worker training, see CSA N286 [9], clause 4.5.2.</i></p>

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NWMO-TISGS-49	Appendix A, page 5, last bullet (PDF page 82)	A management system that conforms with the applicable requirements CSA N286-12, Management system requirements for nuclear facilities, Toronto, 2012.	<del>A management system that conforms with the applicable requirements CSA N286-12, Management system requirements for nuclear facilities, Toronto, 2012.</del>	The management system is not submitted as part of the safety case. It is a separate submission.
NWMO-TISGS-50	Appendix A, Page 6, Line 1 (PDF page 83)	Following a graded approach to safety, the rigour in developing the safety case is commensurate with the hazards from the waste to be disposed (used nuclear Candu fuel) and the licensing stage (site preparation).	Following a graded approach to safety, the rigour in developing the safety case is commensurate with the hazards from the waste to be disposed (used nuclear <del>Candu</del> fuel) and the licensing stage (site preparation).	<p>The NWMO recognizes and agrees that most of the used fuel planned for disposal are used CANDU fuel bundles.</p> <p>A small portion of the used fuel planned for disposal belongs to AECL, as a result of prototype and research reactor operations. Most of AECL's used fuels are prototype CANDU bundles, while the remaining fuels were used in reactor fuel research, medical radioisotope production and for general radiation and nuclear physics research applications.</p> <p>The final inventory of fuel into the DGR will be a function of at least the following studies and agreements:</p>

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				<ul style="list-style-type: none"> <li>- The Waste Acceptance Criteria, and the used fuel owner's ability to meet the Waste Acceptance Criteria</li> <li>- The results of the Safety Case, with important inputs from the Pre-Closure Safety Analysis and Post-Closure Safety Assessment.</li> <li>- The hosting agreements between NWMO and Wabigoon Lake Ojibway Nation, and the Municipality of Ignace, respectively.</li> <li>- Any additional constraints or conditions imposed by an authority having jurisdiction over the project, i.e., the CNSC.</li> </ul>
NWMO-TISGS-51	Appendix A Page 7, Bullet 2 (PDF page 84)	Normal evolution scenarios must be defined. Disturbing events that are expected to occur in the future (e.g., glaciation, earthquakes, climate change) are to be included in the normal evolution scenarios and their probability of occurrence specified.	Normal evolution scenarios must be defined. Disturbing events that are expected to occur in the future (e.g., glaciation, earthquakes, climate change) are to be included in the normal evolution scenarios <del>and their probability of occurrence specified.</del>	The post closure safety assessment will define the normal evolution scenario and include and evaluate the impact of disturbing events. However, not all disturbing events have a probability of occurrence associated with them. This represents a new requirement over the existing text in REGDOC 2.11.1 Vol III. Specifically, the REGDOC acknowledges that: "The occurrence of events such as fire, flood, seismic activity, volcanism and human intrusion cannot be predicted accurately, even in cases where they can

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				<p>be associated with an annual probability of occurrence or a return period.”</p> <p>The NWMO recommends that the sentence be modified to exclude the requirement to include/calculate a probability of occurrence for each disturbing event. In cases where using a probability of occurrence is applicable, the NWMO is incorporating the probability of occurrence into the post-closure safety assessment models.</p>
NWMO-TISGS-52	Appendix A Page 8 SCA: Operating performance (PDF page 85)	<ul style="list-style-type: none"> <li>• Conduct of licensed activity</li> <li>• Procedures</li> <li>• Reporting and trending</li> <li>• Outage management performance</li> <li>• Safe operating envelope</li> <li>• Severe accident management and recovery</li> <li>• Accident management and recovery</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct of licensed activity</li> <li>• Procedures</li> <li>• Reporting and trending</li> <li>• <del>Outage management performance</del></li> <li>• <del>Safe operating envelope</del></li> <li>• <del>Severe accident management and recovery</del></li> <li>• Accident management and recovery</li> </ul>	<p>The NWMO will assess credible accidents and malfunctions for the DGR (including event prevention and mitigation); however, the reactor-operations concepts captured under this CNSC ‘Operating Performance’ specific area (e.g., outage management, safe operating envelope, and severe accident management) are not an appropriate fit for a DGR as defined in the CNSC Safety and Control Area framework.</p>

Comment Number	Line in TISGs / Reference	Current TISGs Requirement Text (verbatim)	Update Text Proposed by NWMO NWMO's proposed wording or comment (additions in <b>bold</b> ; deletions shown as <del>strike-through</del> )	Rationale
NWMO-TISGS-53	Appendix A Page 9 SCA: Safety Analysis  (PDF page 86)	<ul style="list-style-type: none"> <li>• Deterministic safety analysis</li> <li>• Hazard analysis</li> <li>• Probabilistic safety analysis</li> <li>• Criticality safety</li> <li>• Severe accident analysis</li> <li>• Management of safety issues (including R&amp;D programs)"</li> </ul>	<ul style="list-style-type: none"> <li>• Deterministic safety analysis</li> <li>• Hazard analysis</li> <li>• Probabilistic safety analysis</li> <li>• Criticality safety</li> <li>• <del>Severe accident analysis</del></li> <li>• Management of safety issues (including R&amp;D programs)"</li> </ul>	Severe accident analysis is specific to nuclear reactor facilities, not a DGR for used nuclear fuel. Suggest removing severe accident analysis from this table.
NWMO-TISGS-54	Appendix A Page 9 SCA: Fitness for Service  (PDF page 86)	<ul style="list-style-type: none"> <li>• Equipment fitness for service/equipment performance</li> <li>• Maintenance</li> <li>• Structural integrity</li> <li>• Aging management</li> <li>• Chemistry control</li> <li>• Periodic inspection and testing</li> </ul>	<ul style="list-style-type: none"> <li>• Equipment fitness for service/equipment performance</li> <li>• Maintenance</li> <li>• Structural integrity</li> <li>• Aging management</li> <li>• <del>Chemistry control</del></li> <li>• Periodic inspection and testing</li> </ul>	Chemistry control is specific to nuclear reactor facilities, not a DGR for used nuclear fuel. Suggest removing Chemistry control from this table.