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Deep Geologic Repository Project
Project Manager
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OPG's Deep Geologic Repository (DRG) in Kincardine, Ontario

Dear DGR Project Manager:

The Organization of Canadian Nuclear Industries (OCNI) is pleased to make this submission on the additional information submitted by Ontario Power Generation for the proposed Deep Geologic Repository Project for Low and Intermediate Level Radioactive Waste in Kincardine, Ontario.

OCNI is an association of more than 200 Canadian suppliers to the nuclear industry that employ in total more than 12,000 highly skilled and specialized engineers, technologists, and trades people who work in the nuclear sector. OCNI companies design reactors, manufacture major equipment and components, and provide engineering services and support to CANDU nuclear power plants in Canada as well as to CANDU and Light Water Reactor (LWR) plants in offshore markets. OCNI companies also supply equipment and services to nuclear decommissioning and nuclear waste management projects in Canada and around the world.

We have reviewed three studies and analyses of the environmental effects of two feasible alternate locations in Ontario for a new disposal facility for low- and intermediate-level nuclear waste submitted by Ontario Power Generation (OPG) in December 2016:

- Study that compares the environmental effects of technically and economically feasible alternate locations for OPG's DGR project - one in crystalline rock and one in sedimentary rock – as well as the incremental costs and risks associated with the off-site transportation;
- Analysis of the cumulative environmental effects of the project, assuming a used-fuel repository is sited near OPG's DGR. (although site for a used-fuel facility has not yet been determined by the Nuclear Waste Management Organization);
- Updated list of OPG's commitments to mitigate adverse environmental effects under the Canadian Environmental Assessment Act, 2012.

Cost Impacts: The OPG studies show that the incremental costs for the DGR at an alternate location range from approximately \$1.2 billion to \$3.5 billion. This additional cost for no reduction in environmental risk cannot be justified.

Environmental Impacts: The OPG studies show that 2,000 additional shipments with more than 1,000,000 km of cumulative travel on public roadways would be required to move the waste currently stored at the Bruce nuclear site to the new location causing an incremental increase in risk of radiation exposure to the public and workers. This would create millions of kg of GHG emissions and incur incremental road collision risks over the decades required to make the additional shipments.

Conclusion: OCNI, representing 200 Canadian member companies with their more than 12,000 highly skilled nuclear engineers, technologists, and trades people, believes that science-based analysis undertaken by OPG confirms that the construction of the DGR Project in Kincardine near the Bruce site should be approved.



Dr. Ron Oberth
President and CEO

Cc OCNI Board of Directors