

PROPOSED DEEP GEOLOGIC REPOSITORY
ONTARIO POWER GENERATION
KINCARDINE, ONTARIO
REFERENCE NUMBER: 17520
DGR JOINT REVIEW PANEL HEARING WRITTEN SUBMISSION IN SUPPORT OF ORAL STATEMENT
GREAT LAKES AND ST. LAWRENCE CITIES INITIATIVE
AUGUST 13, 2013

The Great Lakes and St. Lawrence Cities Initiative (Cities Initiative) is an organization of over 100 cities from Canada and the United States representing over 16 million people that work together for the protection, restoration, and long term sustainability of the largest body of surface fresh water in the world. Leading by example in their own cities and addressing issues that concern the broader basin, the organization is a positive presence for action and results that benefit the resource.

An issue that has been a concern of the organization for many years has been the long term management of low, medium, and high level radioactive waste generated by nuclear power plants on the shores of the Great Lakes and St. Lawrence in Canada and the United States. The proposal by Ontario Power Generation (OPG) to manage current and future low and midlevel waste from its Bruce, Pickering, and Darlington facilities in a Deep Geologic Repository (DGR) near Kincardine, Ontario, 680 meters below the surface of the ground in limestone one kilometer from Lake Huron seeks to address that concern. OPG asserts that the DGR is more secure than the current above ground storage for the existing waste and the waste to be generated in the future. Several individual members of the Cities Initiative have been involved in the project for a number of years, but the organization only became involved in December of 2012. Representatives of the Cities Initiative have explored and discussed the matter since then and toured the facility on May 17, 2013. The Board of Directors of the Cities Initiative submitted comments on the environmental impact statement on May 24, 2013, and the members discussed the issue at some length at the annual meeting of the organization on June 19, 2013.

The proposal is a significant effort to address the issue of long term management of low and intermediate level waste, but there are major concerns about whether the DGR in Kincardine is the right answer. This matter is especially important because it will set a precedent for how at least low and medium level radioactive waste is handled from all the nuclear power generating facilities in the Great Lakes and St. Lawrence basin in Canada and the United States. Set forth below is the position of the Cities Initiative on the proposed project and the explanation for that position. The Cities Initiative opposes the proposed project at this time for the reasons described below. It is important to note that several members within the organization support the project and will likely appear at the hearing to make their position known.

The municipality of Kincardine came forward as a willing host community in 2002 and proceeded to negotiate over the next several years and sign an agreement with OPG for the DGR. The proposed facility has broad community and political support in the Kincardine and Bruce County area, although there are some in the area opposed to the project. There has been extensive community

outreach in the immediate area over the years, some in the State of Michigan in the United States, and extensive information has been available on line from OPG and the Joint Review Panel formed by the Canadian Nuclear Safety Commission and the Canadian Environmental Assessment Agency to review the proposal.

The primary concerns about the project are the proximity of the DGR to Lake Huron and the failure to consider any other location for the facility. Regardless of the suitability of the geology and the engineering of the DGR, it seems unwise to locate the radioactive waste that close to the largest source of fresh water in the world and the drinking water supply for over 40 million people in Canada and the United States. This broader Great Lakes and St. Lawrence community has a legitimate concern about this project and about the proper long term management of radioactive waste, and the outreach by OPG did not sufficiently factor in more extensive communication to this concerned community. In addition, with the size of Ontario and the very stable geology throughout the province, it would seem wise to look at more potential sites to see if some are even more appropriate than Kincardine.

More specifically about the geology of the area, OPG says that the limestone that would separate the DGR from Lake Huron has extremely low permeability such that any water is very unlikely to infiltrate and that any radioactivity that might leak would move at such a slow pace there would be no risk for millions of years. Those who are concerned say that limestone is a permeable rock and that many parts of Ontario have less permeable rock, especially in the Canadian Shield.

Based on the above, the Cities Initiative opposes the DGR proposed by OPG in Kincardine at this time for management of low and intermediate radioactive waste.