

From: Jaro Franta
Sent: Friday, January 18, 2019 4:54 PM
To: Consultation (CNSC/CCSN)
Subject: RE: Feedback on comments received on REGDOC-1.2.1

To: Canadian Nuclear Safety Commission
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From: Jaro Franta

RE: Feedback on comments received on REGDOC-1.2.1, Canadian Nuclear safety Commission (CNSC):
Class 1B Facilities: Guidance on Deep Geological Repository Site Characterization, Draft October 2018

In their comments on section **2.2 Borehole Drilling, The Inverhuron Committee** state that “During our interactions with OPG and the CNSC, The Inverhuron Committee raised a concern that merely six boreholes were taken at the Bruce site.

This project has a very large footprint and, therefore, boreholes need to be taken at every length, corner and at various depths.”

Similarly, they state regarding section 5.3 that “This section on borehole quality assurance reaches back to Item 2.2 where we expressed a concern about the minimum number of boreholes drilled for the OPG project, considering its physical size, level of experimentation and lack of available quantitative data.”

Indeed, CNSC’s list of “Sampling and testing procedures” in section 5.3 is deficient.

Specifically, the procedure of **inter-borehole tomography** is not mentioned.

This procedure is used to minimise the number of boreholes, each of which is a potential future leak path, requiring high quality sealing.

The procedure uses technology similar to what was tested at the Grimsel rock laboratory operated by Switzerland's NAGRA (their equivalent of our NWMO).

NWMO should in fact publish an APM report, that provides some information on the tomography procedures and interpretation studies that they intend to use.

That would help CNSC to specify, as part of REGDOC-1.2.1, a reasonable or acceptable range in level of detail (resolution), after computer processing of raw tomography instrument data collection.

Sincerely,

Jaro Franta