
From: Consultation (CNSC/CCSN)
Subject: Canadian Nuclear Safety Commission's (CNSC) plan to bury nuclear reactors and facilities on-site
Importance: High

From: Sunil Nijhawan
Sent: Thursday, December 19, 2019 2:56 PM
To: Seamus.ORegan@parl.gc.ca; justin.trudeau@parl.gc.ca
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Subject: Canadian Nuclear Safety Commission's (CNSC) plan to bury nuclear reactors and facilities on-site

The Honourable Justin Trudeau
Prime Minister

The Honourable Seamus O'Regan -
Minister of Natural Resources

Dear Prime Minister Trudeau / Minister O'Regan:

I am a nuclear engineer with over 35 years of Canadian Nuclear industry experience and active participation in development of nuclear technology in Canada. I have returned home to live in Halifax again but am keenly in touch with the affairs of the nuclear industry, including that of our national nuclear regulator CNSC.

I am writing you to bring to your attention plans by the CNSC, an agency under your watch, to allow in-situ burial of nuclear facilities as opposed to the normal and sane international practice of their total removal in what we call Decommissioning. This plan is unfathomably irresponsible and against our current and future national interest.

Imagine burying or even leaving patients where they die - a morbid example but nonetheless no more horrific than littering the country with dangerous and unpredictable nuclear reactor morgues. This is contrary to what we promised when we started building civilian reactors and related nuclear sites ~50 years ago. We were going to 'decommission' them and return the sites to green spaces and actually set aside money for it. The sneaky proposal now by the CNSC is to declare the practice of on-site burials they currently propose for 3 smaller reactors into an acceptable practice and to turn nuclear stations into nuclear waste sites. Imagine a 4 sq km of nuclear morgue in the middle of metro Toronto as the Pickering site will soon be just outside Scarborough where a million people live. Then imagine it staying there decaying and hurting this nation for the next million years because neither the CNSC, nor the associated companies will survive more than a couple of decades. Our generation has no right to allow such decisions, no matter which corrupt or incompetent person in authority or company it is convenient to or benefits now.

Also imagine the response your US state and federal counterparts will have when they discover that the common waters of the lakes we share are going to see abandoned nuclear sites on our sides of the lakeshores. The shame the outcry will cause can be avoided by your timely intervention. You must support only responsible behaviour by our federal agencies, no matter how they sugarcoat their irresponsible decisions such as this one.

I would like you to intervene and have your staff re-examine the planned audacity of the Canadian Nuclear Safety Commission (CNSC) to totally ignore international guidelines and practices and contemplate supporting such a policy in interest solely of the multinational consortia that it now blatantly keeps foremost and serves first in its decisions and policy making. As a nuclear engineer all I can say is- in words of Greta Thunberg a now famous environmental activist - HOW DARE YOU?

I will be happy to come and brief you on the irreparable damage this short sighted policy will do to our country in both short and long term. And should you happen to be coming to Halifax, please ask your staff to arrange a brief meeting with you so that I can also brief on the downward spiral in safeguarding of public interest by the current CNSC. If you do not stop this, you may just allow public safety and safety be sold off to the best corporate bidder, like the ones operating the Canadian Nuclear laboratories now and benefitting from doing the most profit intensive things to the nuclear waste there.

Ask your staff to brief you on the Canadian obligations under as a signatory to the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. Under this convention, Canada must pay "due regard to internationally endorsed criteria and standards." Burying reactors where they operated is contrary to internationally endorsed criteria and standards

Ask your staff to also confirm to you whether the CNSC's draft "regulatory document" on decommissioning, which proposes to accept on-site disposal of decommissioning wastes at nuclear reactor sites, conforms or not to the International Atomic Energy Agency's safety standard on decommissioning. We are fast becoming a laughing stock of the world in our nuclear regulatory practices, as evident from the outcry from the neighbouring US state members of Congress writing to shame you PM Justin Trudeau a couple of weeks ago about the Canadian plans to recommend nuclear waste disposal on Lake Huron sites. The CNSC is turning us into a banana republic of nuclear safety standards and hiding behind loud slogans and empty PR about never compromising safety. Right now with this proposal they are compromising the future of my and your grand children. Shameful, really shameful. I think it is time you sacked the gang there.

Sincerely,

Sunil Nijhawan, Ph.D, P.Eng

Halifax

Tel : personal information redacted