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**To:** Consultation (CNSC/CCSN)  
**Subject:** Comments to the CNSC from The Inverhuron Committee concerning: Radioactive Waste Management and Decommissioning. Discussion Paper DIS-16-03

Please find below Comments to the Canadian Nuclear Safety Association from The Inverhuron Committee regarding Radioactive Waste Management and Decommissioning. Discussion paper DIS-16-03

## 2.1 Defining Waste Types

Intermediate Level Wastes need to be re-examined. Longevity of radioactivity should be considered. Canada should have, as most countries do, a 2nd level of Intermediate Level Waste that has long lived radionuclides similar to High Level Wastes. This would bring Canada in line with international best practices.

Why is short lived Intermediate Level Waste not returned to the owner?

## 2.2 Making "reduce, reuse, recycle" a Requirement

The Inverhuron Committee supports the idea of "reduce, reuse, recycle". Safety must not be compromised. At present the requirements are too vague. They need more clarity and oversight. The possible uses of 'reuse and recycle' including applications, products and acceptable levels of radioactivity must be clearly understood. For example, sending reduced waste to a foreign country for reuse in products that may be re-sold in Canada may not be acceptable to Canadians.

Incinerating radioactive waste to reduce volume releases radioactivity into the atmosphere and the

environment. Compaction and super compaction would reduce volume and not release additional radioactivity into the air.

### 2.3 Establishing Record Keeping Requirements for Waste Operations

Radioactive wastes have long lives, record keeping should be longer than 10 years after a licence expires.

### 2.4 Licensing of Waste Management and Decommissioning Operations

The Inverhuron Committee has gone on record and presented to the Joint Review Panel on the Project for a Deep Geologic Repository at the Bruce site that 'it is unacceptable to have a Deep Geologic Repository located in the Great Lakes Basin'.

The 'unique' licence requirements (regardless of inventory) that are proposed for all repositories is not acceptable. It is possible that the outcome from the Joint Review Panel hearings for the repository at the Bruce site would have been different for a 'unique' licence application.

If the Canadian Nuclear Safety Association is considering approving the proposed unique licence applications for repositories, the unique licence requirements must include:

- 1) the location of the proposed repository and implications to the environment if the repository has an accident or unplanned event.
- 2) a comprehensive disaster recovery plan for all levels of accidents including catastrophic.
- 3) that there be fair and equitable compensation to households displaced and/or devalued by the approved licence and/or later contaminated during any phase of the repository.
- 4) that baseline health studies are in place to enable the monitoring of long term effects.
- 5) that the Canadian Nuclear Safety Association be accountable for the licences they approve.

Abandoning Low Level Waste and short lived Intermediate Level Waste in a Deep Geologic Repository is not in accordance with international best practices. International best practices keep these wastes in above ground or near surface containment. Approximately 97% of the volume of radioactive waste could be safely managed in above ground or near surface facilities or landfills designed for nuclear waste. This is likely the most economical method. This leaves just 3% of the volume of radioactive wastes requiring a repository or some equally isolating means of storage.

## 2.5 Waste Management Program Requirements

Any deviation from international best practices must be supported by scientific evidence.

## 2.6 Regulatory Remediation Activities

Remediation should be defined as to process and the proposed goal or use of sites when remediation is complete.

## 2.7 Release from Licensing after Decommissioning or Remediation

There should be a public information program to inform residents of the plan for the site and the results of environmental monitoring programs.

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