
From: Cathy Vakil <personal information redacted>
Sent: November 5, 2019 8:27 PM Consultation (CNSC/CCSN)
To: Comments re. REGDOC-2.11.1, Waste Management, Volume III by Canadian Association
Subject: of Physicians for the Environment
Comments re. REGDOC 2.11.1 Vol3 ver2, Nov 5,2019.doc

Attachments:

Please see attachment, on behalf of Canadian Association of Physicians for the Environment.

Cathy Vakil MD,CCFP, FCFP
Assistant Professor
Department of Family Medicine
Queen's University
Kingston, ON



CAPE
Canadian Association
of Physicians
for the Environment

Association Canadienne
des Médecins
pour l'Environnement
ACME

Nov. 5, 2019

To: Canadian Nuclear Safety Commission P.O. Box 1046, Station B 280
Slater Street, Ottawa ON K1P 5S9

From: Cathy Vakil MD, Canadian Association of Physicians for the
Environment

Re. draft CNSC REGDOC-2.11.1-vol3-ver2, on Waste Management: Safety
Case for Long-Term Radioactive Waste

To Whom it May Concern,

I am writing this document on behalf of Canadian Association of Physicians for the Environment (CAPE) which is an organization of health professionals and concerned citizens, that addresses environmental impacts on human health. I am a family doctor in Kingston Ontario, and Assistant Professor in the Department of Family Medicine at Queen's University in Kingston.

I am responding to an invitation for the public to give feedback on the comments received by the CNSC between May 24 and Sept. 16, 2019 regarding the regulatory document on nuclear waste management, REGDOC-2.11.1-vol3-ver2, on Waste Management: Safety Case for Long-Term Radioactive Waste Management. I have read this draft CNSC document, and have significant concerns about it.

In summary, I agree with the comments posted by Northwatch, Sandy Greer and Concerned Citizens of Renfrew County and Area.

It is clearly stated in the document that the applicant (the nuclear industry proponent) would be responsible for defining and assessing its own safety case. Instead, the CNSC, as the regulatory body, should be setting strict standards to which the proponent should have to demonstrate adherence. Allowing the industry to establish its own controls and conditions is irresponsible and similar to the fox minding the henhouse.

The document describes continued reliance on computer modeling to assess safety, which is based on assumptions and extrapolation. The fact is that we cannot reliably predict climate/weather patterns, catastrophic events or events “beyond design basis”, radionuclide and geological behaviour and container corrosion over many thousands or millions of years, and subsequent radiation doses, and it is unreasonable to think otherwise. To use computer modeling based on these assumptions as a basis to define public safety puts the public at risk, as is tragically illustrated by the accident at Fukushima, and the many extreme weather events witnessed worldwide on a regular basis. There are inevitable uncertainties that cannot be predicted or quantified, and with toxic radioactive waste, we cannot take risks, especially if they will be borne by future generations who will pay for our mistakes and wrong assumptions with their health, and the health of the planet, which are inextricably linked.

There is so far no solution worldwide to the problem of nuclear waste and any suggestion, as in this document, that there is any true reliable scientific evidence that a DGR would be safe for thousands or millions of years is misleading and puts our health, and the health of future generations at risk.

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