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## No Radioactive Waste Dump in the Heart of the Great Lakes!

The proposal to build a deep underground dump (DUD) for radioactive wastes on the shoreline of the Great Lakes is unacceptable. Water is the most likely dispersal medium for toxic materials in general, and for radioactive wastes in particular.

Nevertheless, that's what is being considered at the Bruce nuclear complex on the Canadian side of Lake Huron. The DUD would be located just over one kilometre (less than one mile) from the Lake, and would house all of the radioactive wastes from 20 commercial nuclear power reactors in Ontario – with the exception of the irradiated nuclear fuel.

It was recently reported that the Canadian Nuclear Waste Management Organization (NWMO) wants to manage the DUD project. But the NWMO deals exclusively with the long-term management of irradiated nuclear fuel, and has nothing whatever to do with other categories of nuclear waste materials. Does the NWMO's involvement mean that the proposed DUD will eventually become a permanent repository for high-level radioactive waste -- making it the "Yucca Mountain" of the Great Lakes region?

The Bruce nuclear complex currently hosts nine reactors (one of them permanently shut down), with proposals for four more. This would make it the largest nuclear power complex in the world. Already there are 500 outdoor silos for the "interim storage" of irradiated nuclear fuel about one kilometre from Lake Huron, and there are plans to build 2,000 more.

Since the DUD is only 50 miles from Michigan across Lake Huron, leakage of radioactivity from the dump could directly affect tens of millions of residents in Michigan, Ohio, Pennsylvania, and New York, and contaminate the drinking water in Port Huron, Sarnia, Detroit, Windsor, Toledo, Cleveland, Erie, Buffalo, Toronto and countless other communities downstream.

Thus, this DUD proposal is not just a Canadian issue, but an international one. In 1986, Canada protested when the U.S. proposed a high-level radioactive waste dump in Vermont because it was too close to the Canadian border; that proposed dump was subsequently cancelled. Now it is time for U.S. residents to speak out. The Canadian DUD proposal sets a dangerous precedent for the establishment of perpetually hazardous facilities on the Great Lakes, and impacts people on both sides of the border.

The successful emplacement of the DUD for so-called "low" and "intermediate" level radioactive wastes from across Ontario – and potentially from the rest of Canada –

will create a threat to the Great Lakes watershed for generations to come. It will also increase the likelihood of the Bruce site becoming a permanent disposal dump for high-level radioactive wastes (i.e. irradiated nuclear fuel), which would increase the risks by many orders of magnitude.

Alarming as this proposal is, the process for assessing its environmental impact is also cause for grave concern. In Canada, environmental panels reviewing proposed nuclear facilities have always been independent of the nuclear establishment -- until now. But for the DUD, the Government of Canada intends to place the review panel under the control of the Canadian Nuclear Safety Commission (CNSC) which is the regulatory authority for licensing nuclear facilities in Canada.

Six months ago, the President of the CNSC was fired by the Canadian federal government for being too strict in her enforcement of reactor safety regulations. The new CNSC President has clear instructions to fast-track all nuclear regulatory approval processes. No environmental assessment panel will be credible if it is dominated by this highly politicized regulatory agency.

Despite the conflict of interest, the CNSC stands ready to chair the environmental assessment panel and to fill two of its three positions. CNSC's domination of the Full Panel Review is unprecedented, and will undermine the panel's credibility. We urge CNSC's exclusion from the Panel, so the panel's independence is assured.

We ask that the public comment deadline be extended for six months beyond June 18<sup>th</sup>. Given the longevity and the unprecedented nature of the hazard that the DUD represents for the entire Great Lakes ecosystem, as well as the minimal outreach to the United States and Native American/First Nations that the Canadian federal government has undertaken, this extension request is reasonable.

Sincerely,

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