

889 Brock Road Pickering, ON L1W 3J2

Tel: 905.839.6746 ext. 5306
laurie.swami@opg.com

February 20, 2014

File: 00216-00531 P
CD#: 00216-CORR-00531-00224
Project ID: 10-60004

Dr. Stella Swanson
Chair, Joint Review Panel
Deep Geologic Repository Project

c/o Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Dr. Swanson:

**Deep Geologic Repository Project for Low and Intermediate Level Waste –
Submission of Independent Risk Assessment Expert Group Comments on
Relative Risk Analysis of Community Acceptance in IR EIS-12-513**

References: 1. JRP letter from Dr. Stella Swanson to Laurie Swami, “Information Request Package #12 from the Joint Review Panel”, November 8, 2013, CD# 00216-CORR-00531-00215.

The purpose of this letter is to request clarification from the Joint Review Panel for the purpose of response to IR EIS-12-513 (Reference 1).

The Independent Expert Group, retained by OPG to conduct the relative risk assessment requested in Information Request (IR) EIS-12-513, has identified to OPG a concern respecting their ability to perform the the relative risk analysis of “community acceptance” of the four options identified in the Information Request. The Independent Expert Group has determined that insufficient information is available for them to properly perform a “distinguishing” risk assessment of community acceptance of the four options.

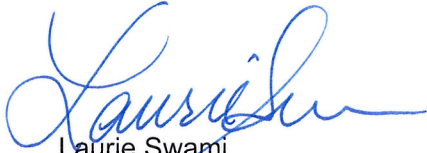
The enclosure provides the correspondence from the expert group to OPG, which more fully explains their concern.

OPG requests that the Joint Review Panel provide clarification of what would be acceptable to respond to this aspect of the Information Request. Separately from the risk assessment, OPG can provide qualitative information respecting community acceptance of nuclear facilities in the Local and Regional Study areas.

The Independent Expert Group is continuing their risk assessment on the other topics included in IR EIS-12-513, and OPG remains on track to provide a response by April 4, 2014.

If you have questions on the above, please contact Mr. Allan Webster, Director, Nuclear Regulatory Affairs, at (905) 623-6670, ext. 3326.

Sincerely,



Laurie Swami
Vice President, Nuclear Services
Ontario Power Generation

Attach.

cc. Dr. J. Archibald – Joint Review Panel c/o CNSC (Ottawa)
Dr. G. Muecke – Joint Review Panel c/o CNSC (Ottawa)
P. Elder – CNSC (Ottawa)
D. Wilson – NWMO (Toronto)

ATTACHMENT

Attachment to OPG letter, Laurie Swami to Dr. Stella Swanson, "Deep Geologic Repository Project for Low and Intermediate Level Waste – Submission of Independent Risk Assessment Expert Group Comments on Relative Risk Analysis of Community Acceptance in IR EIS-12-513"

February 20, 2014

CD#: 00216-CORR-00531-00224

Independent Risk Assessment Expert Group Correspondence

February 18, 2014

Laurie Swami
Vice-President, Nuclear Services
Ontario Power Generation
889 Brock Road
Pickering, ON L1W 3J2

Dear Ms. Swami:

The undersigned are members of the independent risk assessment expert group established by OPG in response to the request of the Joint Review Panel for OPG's Deep Geologic Repository Project for Low and Intermediate Level Waste [hereafter JRP]. Among the tasks stipulated for the expert group is a relative risk analysis of four specific waste options as specified by the JRP. In addition, the charge to the expert group further stipulates: "The relative risk analysis should include the following:... Community acceptance in the Local and Regional study area [and] outside of the Regional Study area."

By this letter we are asking you to forward to the JRP the following set of comments on that part of the relative risk analysis which deals with the concept of "community acceptance."

1. The charge to the expert group further states: "The [relative risk] analysis is to be qualitative, transparent, defensible, and repeatable." We interpret this charge, specifically the terms defensible and repeatable, as also encompassing the notion that our analysis must be "evidence-based."
2. We are aware of the following 2003 study that surveyed the local communities on some options for the management of low and intermediate level radioactive waste at the WWMF site:
 - a. "Public Attitudes towards Long Term Management of Low and Intermediate Level Radioactive Wastes at the Western Waste Management Facility [WWMF]." This is a consultants' report prepared by Intellipulse for Golder Associates and Gartner Lee Limited; it is dated September 2003 and is 120 pages in length.
 - b. The purpose of this study included an attempt to "gauge awareness of the existing WWMF and the long term waste management options under consideration." The study results were based on a telephone survey which polled 751 residents of Bruce County, including residents of the Municipality of Kincardine and neighbouring municipalities.
 - c. Those surveyed were read the following statement: "There are three options currently being considered for long-term waste management. They are: (1) Enhanced Processing, Treatment and Long-Term Storage; (2) a long-term management facility using Covered Above-Ground Concrete Vault technology;

and (3) a long-term management facility using Deep Rock Cavern Vault technology. All three can be safely constructed and operated at the Western Waste Management Facility.”

- d. We note that these options correspond to two of the four waste management options specified by the JRP in the charge to our expert group. Option (1) is similar to Enhanced Surface Storage; Option (3) is the Bruce site DGR. Option (2) does not correspond to any of the four options we have been asked to consider, since it was a surface disposal concept suitable for LLW but not for all ILW.
 - e. The study results indicated (pages 25-26) that a clear majority of respondents – between 63% [Neighbouring Municipalities] and 77% [Kincardine] – *did not* believe that the operations of the WWMF, *regardless of what waste management option were to be chosen*, would have any adverse effect on the attractiveness of Kincardine as a tourist destination, as a place to establish and operate a business, or as a place to live.
 - f. The 2003 study results did not ask about community views on an off-site granite DGR, which is part of our task.
3. Subsequent to this study, there were decisions made by the local municipal councils favoring a DGR at the Bruce site. There was also a survey in 2009 on public attitude with respect to the proposed DGR project at the Bruce site, notably:
- a. Municipal council decision in Kincardine and letters of support from neighbouring communities of Saugeen Shores, Huron-Kinloss, Arran-Elderslie and Brockton in 2004 supporting the DGR option, and reaffirmed by the mayors at the JRP Hearings in 2013.
 - b. “Deep Geologic Repository: Public Attitude Research,” prepared by Intellipulse for AECOM Canada in 2009/2010, 178 pages in length.
 - c. These provide an indication of community acceptance for the Bruce site DGR option. They do not provide information on community acceptance of the other three options we have been charged to assess.
4. We are aware that the JRP has received input from individuals and groups for and against various options over the course of the 2-year public review, including indefinite on-site storage, Bruce site DGR, and a granite site DGR. However we were not present throughout this extensive process, and we are not aware of a systematic survey of views on the four options that we have been asked to assess.
5. We are aware that NWMO carried out extensive research on Canadian public attitudes toward the management of high-level radioactive waste (HLW) during the period 2002

to 2005. This included a deep geologic repository option as well as a centralized indefinite storage option. NWMO concluded that there was a general acceptance for an option that involved a deep geologic repository as its technical end point, in either sedimentary or crystalline rock. However, we do not believe that the findings of this research are directly relevant to the tasks before the independent expert group, which deal only with LLW and ILW.

6. We do not believe that information drawn from any other jurisdictions, either in Canada or elsewhere, pertaining to the siting of LL and IL radioactive waste storage and disposal facilities, would be directly relevant to the issue of local and regional community acceptance of the four options we have been charged with assessing.
7. Therefore, in the evidence we have before us, there is insufficient information directly relevant to the issue of local and regional community acceptance, based on research having to do with *discriminating* among the four specific options listed in the charge to the expert group.
8. For these reasons we will be unable to comment on the issue of community acceptance in our relative risk analysis.

Sincerely yours,

Members of the Independent Expert Group:

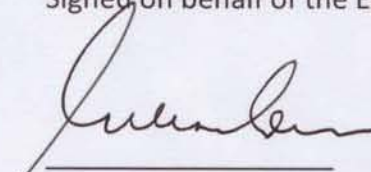
Maurice Dusseault

Tom Isaacs

William Leiss, Chair

Greg Paoli

Signed on behalf of the Expert Group:



William Leiss, Chair