

## **Proposed Information Requests on the Technical Merit of the Additional Information**

**Organization: The Inverhuron Committee**

**Participant: Marti McFadzean, Chair**

The Inverhuron Committee appreciates the opportunity to submit comments relative to Ontario Power Generation's (OPG) Response document submitted on December 28, 2016 to the Minister of the Environment and Climate Change via the Canadian Environmental Assessment Agency.

The Inverhuron Committee has been fully engaged in the environmental assessment process for the proposed repository project for the permanent storage of low and intermediate level waste.

We have submitted written observations and made oral presentations to the Joint Review Panel at the Hearings of 2013 and 2014.

As follow-up, we also submitted a document of Final Comments after the Report from the Joint Review Panel was released on May 6, 2015.

Our group and our community at Inverhuron is opposed to this project, based on a survey of our community which indicated that a majority of residents were not in favour of the proposal.

Having studied the recent Response document from OPG, we are presenting our comments based on several issues with the document: the methodology used; flaws of accuracy and consistency in the data presented; as well as flaws in the rationale for citing transportation as a hindrance to further analyzing alternate locations. To improve readability our comments will be cited in *italics* below information stated by OPG.

We will be focusing our Comment Submission on Sections 4 and 5 of OPG's Response to Information requested from the Minister of the Environment and Climate Change on February 18, 2016.

As indicated by the Canadian Environmental Assessment Agency, we will not repeat earlier information that we have submitted as part of the Joint Review Panel and its follow-up.

Instead, we wish to review OPG's document with the following highlights:

1. Environmental Effects of Alternate Locations
  - The change in approach used by OPG to describe regional geologic regions as opposed to actual sites that would be technically and economically feasible

2. Valued Components of Alternate Locations
  - Groundwater quality
  - Release of radionuclides
  - Adverse Effects on socio-economic, land use and cultural heritage
3. Cost and Estimate for Packaging and Transporting Waste to Alternate Locations
  - Wider examination of methods of transport (rail)
  - Lack of baseline data for transport to the Bruce site from the Toronto area over the past 40+ years
  - Magnified parameters to alternate locations (increases costs and risks)
  - Quantity of low level waste to be transported – question the need for a repository
4. Inconsistencies and Inaccuracies of Information
  - Calculation inconsistencies
  - Narrative inconsistencies
  - Gandalf Survey results

## **Environmental Effects of Alternate Locations**

On December 28, 2016, Ontario Power Generation submitted a Response to the questions posed by the Minister of the Environment and Climate Change. This Response was relative to the Minister's request to study actual technically and financially feasible alternate locations for the low and intermediate level nuclear waste repository project.

At this point, it is crucial to note that OPG has chosen to respond to the Minister with different parameters from the Minister's request, indicating that the company "intends to provide an assessment of the environmental effects of two technically and economically feasible geologic regions in Ontario..." Two large areas covering most of northwestern and southwestern Ontario were examined in a general manner. In terms of methodology, this alternate structure to the Response allows for no specific data collection from a particular site but relies solely on computer modeling and "professional judgment". These vast areas would certainly have particularities within their geologic make-up, their landscape, population base, flora, fauna and aquatic environment as well as the ability of the specific rock of an actual site to support blasting and drilling activities.

OPG's Response to the Minister's request is founded on a remarkable paradigm shift away from the Minister's request for actual locations to an overview of geologic regions, making it impossible for those of us who have concerns about the project to view with any credibility that the proponent has completed the requested tasks.

## **Valued Components (Section 4)/ relating to Methodology**

Sections 4 and 5 of OPG's Response document contain the salient details of OPG's study. We will focus our submission on these two sections, adding additional comments as needed.

OPG chose to structure their response in Section 4 of the Report using the criteria of Valued Components (VCs).

In Section 4 of the Report entitled Environmental Effects of Alternate Locations, the following Valued Components were taken into consideration: Atmospheric Environment, Surface and Water Environment, Aquatic Environment, Terrestrial Environment, Geology and Hydrogeology, Radiation and Radioactivity, Land and Resource Use.

The VC's were individually examined on pages 5-61 of Section 4 entitled Environmental Effects of Alternate Locations.

The results of this examination were that "the DGR at an alternate location would require the same works and activities, and the same phases, as proposed for the DGR Project at the Bruce Nuclear site as described in the EIS (OPG 2011)." Reference: page 7 of Section 4, Environmental Effects of Alternate Locations.

Any new incremental works are listed under the site selection and licensing section of Table 3-1, Page 7-11. These include work activities such as boundary fences, road and corridor construction, monitoring, additional storage buildings, intermediate waste staging, and backfilling with cement if necessary.

The conclusion of OPG, as a result of their study of alternate regions, was that the major new incremental costs were relative to transportation. These new transportation costs are further developed in Section 5 of their Report entitled, Cost and Estimate for Packaging and Transporting Waste to Alternate Locations and will be discussed later in our comments.

Ontario Power Generation indicated that the screening used for potential interactions with VCs was based on the use of "professional judgment based on the general understanding of existing environmental conditions in the alternate locations under consideration". The methodology used is not consistent with OPG's ongoing media conversation touting "science" as being the way to examine and study projects of this nature.

As concerned citizens, we take issue with OPG using modeling and judgment to arrive at general conclusions about the effects and outcome of their project, particularly relative to the location adjacent to Lake Huron.

We expected that the Minister's request would require OPG to produce hard data from several specific locations that would include borehole drilling as well as a history of seismic activity and documentation on possible karst geology in relation to a particular area. OPG's study map shows that most of Ontario was considered. Such a generalization is not adequate for the type of project that is being proposed. It was, also, our expectation that OPG would study actual alternate sites for this project and that these locations would be removed from the Great Lakes Basin since this proximity to the waters of the Great Lakes is an over-riding concern among a majority of Ontarians (see the recent Gandalf survey 2016).

It is most notable in the examination done of the VC's related to alternate locations that:

- In relation to groundwater, surface water quality, and aquatic environment in both sedimentary and crystalline rock, OPG states that “surface water that has been collected would also have come into contact with the waste rock which could have the potential to leach metals” (page 22) AND “changes in groundwater flow or groundwater quality through groundwater discharge to surface water bodies” (page 21) AS WELL AS “additional mitigation may be required at the sedimentary alternate location if discharged to a smaller watershed”. (Page 26)

*The Inverhuron Committee has continued to express concerns for this project relative to water quality and these concerns have consistently been negated by the proponent. However, in the Report, as seen above, there are very real issues stated relating to water that must be a priority in choosing a site. Our ongoing concern about the project location on the Great Lakes continues to be an extreme concern.*

*We cite the following example of water contamination at Sellafield, located in Cumbria, UK on the Irish Sea coast. Since the 1940s, Sellafield has hosted nuclear power stations, nuclear waste storage and nuclear fuel reprocessing facilities (a possible future off-shoot of the nuclear site).*

*During the past sixty plus years, various nuclear toxins have been released into the air and leached into the Irish Sea from Sellafield, resulting in a measureable increase in radiation readings in the sea around Dublin.*

*The following comparison serves to point out that Lake Huron, although large, is not large enough to safely dilute the effects of nuclear waste seepage.*

*The Irish Sea has a surface area of 103,600 sq. km. Lake Huron, the second largest of the Great Lakes, has a surface area of just 59,600 sq. km. The closest part of the Republic of Ireland to Sellafield is approximated 195 km; Dublin is about 215 km away. The closest point in Michigan is just less than 100 km from the Bruce site. Of even more significance, the Irish Sea is salt water; Lake Huron is fresh water and is a significant part of the largest body of fresh water on Earth on which 40 million people depend for their drinking water.*

- OPG states on page 36 that “Releases of radionuclides from the DGR during the operations and decommissioning phases are possible and could lead to human and non-human exposure via different pathways such as ingestion or immersion in contaminated surface water, inhalation of air and indirectly through groundwater”.

*OPG and the Joint Review Panel excluded effects on the human population in their list of possible VCs and yet it is stated above that there is a risk of contamination. Since effects on humans are implicit in this project, we recommended in our presentation to the Expert Panel, created by the Canadian Environmental Assessment Agency, that the human element is of paramount concern in the creation of a nuclear waste site. Certainly, the effect on humans warrants as much attention as the Review Panel paid to flora and fauna. The human element to the Environmental Assessment package is part of the social license that is required for this project to move forward.*

- On page 72, Section 7.2.2 OPG states, “there is little interest among the general public regarding the DGR Project”.

*We would bring the Canadian Environmental Assessment Agency and the Minister’s attention to the 187 cities in Canada and the United States, representing 23 million citizens, that have passed Resolutions opposing OPG’s planned nuclear waste dump, or any nuclear waste dump anywhere in the Great Lakes Basin, and the 95,000 individuals who have signed the petition created by Stop the Great Lakes Nuclear Dump.*

*OPG purports that there is limited interest from the public in this project and in nuclear waste generally, based on “Google searches” where nuclear waste did not appear to have as much interest as wind and solar energy. Their conclusion is that, therefore, the nuclear waste project does have citizen support based on this Google indicator.*

*As an opponent of this project, The Inverhuron Committee interprets the data very differently. People are paying more attention to our energy issues and that they are wanting more information on new energy initiatives which are clean for the environment, sustainable, cost-efficient and reliable. Citizens are not interested in finding out more about energy sources that either leave a carbon footprint or require shielding for hundreds of thousands of years like nuclear waste. We interpret the Google search history as support for the energy of the future and not as support for the repository project.*

- OPG cites on page 5 of Section 4 on Environmental Effects that “adverse effects on socio-economic, land use and cultural heritage may occur due to changes in the environment such as nuisance effects to nearby land users and depletion of resources”.

*OPG has denied any impact on the residents of Inverhuron based on a survey done with occasional users at the Inverhuron Provincial Park. However, Inverhuron residents, who were not part of the survey, see a tremendous impact on the enjoyment of their property due to air quality, noise, and the physical presence of a huge waste rock pile that will extend 115 feet in height and cover 40 acres of land. In 2004, the Ivey School of Business did a study for the Municipality of Kincardine and the results showed a loss of approximately 700 million dollars in the overall value of the Municipality, which would include real estate value and the loss of tourism dollars. The inconsistencies are remarkable.*

*There is no detailed Property Protection Plan in place to cover the above-mentioned loss of real estate value by the residents affected. The 2004 Hosting Agreement lays the proof of contamination on the property owner, as the basis for compensation and this will, in fact, be determined by the project owner, OPG.*

## **Cost and Estimate for Packaging and Transporting Waste to Alternate Locations/ relating to Methodology**

We would like to submit the following comments on Section 5 of OPG's Response:

- OPG's consultant, Energy Solutions Canada, prepared estimates for the cost of packaging and transporting waste by road to hypothetical alternate sites involving distances of 100 km, 200 km, 300 km, and 2000 km. These estimates included re-packaging 150,000 cubic metres of low and intermediate level waste, which is forecast to reside at the Western Waste Management Facility when a new DGR is opened. Rail transport was eliminated based on "transport of nuclear waste by rail would require dedicated trains..." (Page 6).

*With a new alternate location, the use of rail may be more feasible. In fact, as a beginning, we would submit, that investigating an alternative means of transport, realigning staging schedules and sites, holding the waste at the Pickering and Darlington sites until shipping is required, as well as building a second waste facility on the alternate sites and factoring in new technologies such as electric/self-driving trucks would result in a fulsome, rigorous and balanced approach in terms of the credibility of OPG's study of alternate locations.*

*The Inverhuron Committee would have appreciated a baseline indication of costs for movement of the waste over the last two years. These costs have already been incurred over the 40 years of transport of waste to the Bruce Nuclear site from the Toronto area. Sufficient real data should be available to create a more dependable starting point for the four proposed distance points.*

*As well, The Inverhuron Committee questions the rationale for using an outer range of 2000 km for the 2055 crystalline site in central/northern Ontario. Using straightforward mapping, we arrive at Fort Lauderdale, Florida as a point 2000 km south of Toronto and, only 848 km north of Toronto, is the town of Moosenee at the southern tip of James Bay which is outside the map provided by the proponent. As well, the north/south dimensions of the Province of Ontario are 1606 km vertically from Port Severn to Toronto while east/west distance is 1114 km horizontally from the Manitoba border to the Quebec border.*

*OPG has pinpointed locations at the extreme perimeter of the borders of Ontario as possible alternate regional sites in crystalline rock. It would seem more realistic to target a range of 600-700 km as the outer edge of calculations relative to an alternate site.*

*We can only conclude from the above, that the high incremental costs and associated risks, based on what appears to be magnified parameters, do not result in a credible construct for reliable data to project either financial implications or for associated risk calculations. We would conclude that alternate specific locations would reduce the costs/risks of a project located on an alternate site. We would have real cost estimates, real geology and real risks.*

*When we include the possibility of rail into the equation we find some interesting alternatives. It is, actually, ironic that Energy Solutions Canada dismissed out of hand the use of rail transport for the movement of low and intermediate level waste in its report to OPG. Energy Solutions, the parent company of Energy Solutions Canada, based in Salt Lake City, Utah, states on its website (as of 2/21/17) that rail is the transport mode of choice for nuclear waste. Nearly all nuclear waste storage sites around the world are served by rail. With the possible exception of water transport (notably used successfully in Sweden), rail is normally the safest and least expensive way in which to transport nuclear waste. A new rail line and a few short yard tracks were constructed to serve the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico. Also, rail will be the principal mode of transport if and when a nuclear waste facility is opened at Yucca Mountain, Nevada. Including rail transport in the analysis, opens up the possibility of economically locating a DGR outside the Great Lakes Basin, probably in the Canadian Shield in northern Ontario as was originally proposed.*

*Pickering and Darlington can be connected to the Canadian rail system quite easily and relatively inexpensively. A rail spur currently runs from CN's Kingston Subdivision (part of CN's main Toronto-Montreal line) south to the edge of the Pickering site, and currently serves several small industries and freight forwarders. Further east, CN's Kingston Subdivision runs adjacent to the Darlington site, where there is evidence of several former sidings and possibly a loop track. In each case, the necessary yard tracks can be reinstalled relatively inexpensively.*

*Hence, low and intermediate level waste from Pickering, Darlington and the Bruce could be shipped directly to a new waste storage site located outside the Great Lakes Basin, or consolidated first at a convenient location adjacent to a main rail line. Low and intermediate level waste would be stored on site at Pickering and/or Darlington until shipments commence to the permanent storage site. If the need exists, consideration may be given to transporting low and intermediate level waste much earlier than 2045 or 2055 once a permanent storage site is selected. The low and intermediate level waste could then be stored above ground at the new site until the appropriate underground storage facilities are finished. OPG would then have the opportunity to reconsider whether it is actually necessary to spend 100s of millions of additional dollars to bury low level waste, with its very short half-life, if an appropriately remote area is chosen.*

*An appropriate storage site could be found in the Canadian Shield somewhere north of the Ontario Northland Railway (ONR) between Cochrane and Hearst or north of the CN mainline between Hearst and the Ontario-Manitoba border. Ideally, the location of the new site will be near enough to CN or ONR to allow for the cost-effective construction of rail access.*

- OPG cites the addition of buildings (capital costs) in order to move the storage facility to another location.

*OPG has requested an extension to their license to operate the Western Waste Management Facility (WWMF) and, within that request, has planned to double the size of the facility, adding storage buildings, processing facilities, administrative offices. How does this request dovetail with the alternative site study?*

*Could an alternative location eliminate the need for OPG to solicit permission for an extension on the Bruce site and, instead, create those requested new facilities in another location?*

- On page 12, the OPG Report says, “In their present state, few of the existing waste containers comply with the rigorous regulations governing packaging for transportation on public roads...”

*Does this statement only refer to packages on site? How does this relate to packages already on roadways from other nuclear sites?*

- The volume of low level waste to be transported is, at least, 90% of the total waste pertaining to the project -90% of this low level waste is to be packed in Type IP-2 containers and 10% of the low level waste requires Type A packaging (see Section 5, page 15) – if either of these containers were in a severe accident, the unshielded radioactive contents are at acceptable standards (Section 5, page 14, items 2 and 3) and “effectively limits the potential external dose for severe accidents to acceptable levels”. If “significant radiological decay can be expected based on the +30 to +60 year period into the future that the shipments would occur, in addition to the decay time which has already occurred”.
- Also, very noteworthy on page 15 of Section 5, Cost and Risk Estimate for Packaging, “For all LLW, 90% qualifies for Type IP-2 packaging, with the remaining 10% requiring Type A packaging” (a more sturdy package) and “Except for fuel channel waste, 70% of all ILW requires Type B packaging, with the remaining 30% qualifying for Type A packaging”. *This, in total, leaves only approximately 7% of the ILW requiring more robust shielding! Surely this should impact the costs and risks estimated.*

*The statement, on page 15 of the Cost and Risk Estimate for Packaging, Section 5 document, begs the question as to why we are spending two billion dollars as well as balking at the transport of the waste away from the Great Lakes? If the low level waste were to remain at each nuclear site for the decay period of 60-100 years when it is considered landfill, we would be eliminating the need for burying the waste in a repository, as well as the need for packaging, transport and monitoring of the low level waste. If the WWMF receives its extension, we have solved the problem for the necessary decay period.*



*In addition, on page 115 of the Joint Review Panel Report (May 6, 2015), the Panel states, “Advances in waste treatment (possibly including physical radioisotope separation) and changing priorities for the use of storage space may lead to a future re-evaluation of the necessity to retain such low-activity materials in a DGR. Some European countries have adopted options for low level waste disposal that do not involve a DGR”.*

*Page 116 of The Joint Review Panel Report under Recommendation 7.3 says, “in order to retain flexibility to reduce the volume of waste stored in the DGR, OPG should prepare, to the satisfaction of the CNSC and before a license to operate the DGR is issued, an adaptive management plan that includes management actions to exploit potential future options for the disposal of low level waste”. The Inverhuron Committee highly supports this effort to reduce the waste to support a more financially responsible project.*

- OPG indicated, during the Hearings of the Joint Review Panel, that it was their intention to double the size of the DGR to include decommissioning waste. This increases the size of the repository from containing 200,000 cubic metres of waste to 400,000 cubic metres of both low and intermediate level nuclear waste.

*The decommissioning waste will be, initially, coming from the Pickering Nuclear Plant, followed by the Darlington reactors.*

*The Bruce site has been approved for refurbishment. Therefore, an alternative site can easily be created outside of the Bruce site in preparation for the additional waste. At this time, no packaging, re-packaging or movement has begun.*

- Lastly, during the Joint Review Panel Hearings, OPG stood steadfast in defense of their transportation record, indicating there had not been an accident in over 40 years since waste had been transported to the Bruce site. However, in their Report to the Minister, they make an estimate on the risk for accidents (from 3-69) not based on their past record but based on the number of shipments compared to commercial truck accidents.

*The Inverhuron Committee has difficulty with a two-pronged explanation of the risk for accident.*

## **Inconsistencies and inaccuracies of Information Provided by the Proponent**

OPG has provided several tables of information and costs relative to the transport of waste to alternate sites ranging from 100 km, 200 km, 300 km, and 2000 km distance. However, with the lack of an actual location, these estimates are prefaced by the disclaimer of an “uncertainty adjustment factor”. These adjustment factors are as follows: 100 km distance, 1.1; 200 km distance, 1.15; 300 km distance, 1.2; and 2000 km distance, 1.4. See Cost Categories for Packaging and Truck and Truck Transport, Tables 4-2, 4-3, 4-4, and 4-5 in Section 5, pages 53-66.

The Inverhuron Committee takes exception to the adjustment factors proposed by OPG's consultant, Energy Solutions Canada. Not only do they artificially bias the results against greater transport distances, the relationship proposed is not consistent with traditional transportation economics. If anything, the adjustment factor should decrease as distance increases. The Inverhuron Committee requests a corrected version or further information.

We would also like to point out that Tables 4-2, 4-3, 4-4 and 4-5 on pages 76-78 of Section 5 are inconsistent in their presentation of costs for the Low Level Waste categories. The total Waste Category Costs (last vertical column) and the Subtotal LLW costs (last horizontal row) are all greater than the total of the respective rows and columns. The same errors are not found in the ILW section of the tables. This raises concerns about how well the transportation analysis was reviewed prior to its submission to the Minister.

One example on page 79 (4-5) exemplifies the confusing calculations:

**Table 4-5: Total Cost for Alternate Location 2055 Availability 2,000 km Transport by Waste and Cost Categories (2016 CAD \$K)**

Waste Category	Descriptor	Waste Container/ Component Quantities	Number of Shipments	Bulk Waste Repackaging Container Supply Cost	Transport Packaging Supply Cost	Packaging Specific Equipment Cost	Packaging Specific Maintenance Cost	Truck Transport Cost	Total Waste Category Cost
<b>Low Level Waste Categories Packaging and Truck Transport</b>									
LLSB Waste Containers	DGR & not DGR Ready	50,514	7,231	\$0	\$7,855	\$112	\$395	\$279,706	\$403,295
Bruce Steam Generators	Self-Packaged Segments	416	416	\$0	\$5,389	\$65	\$198	\$24,278	\$41,901
Trench Waste	In Unshielded Containers	1,926	241	\$0	\$3,408	\$112	\$175	\$9,312	\$18,210
Heat Exchangers	Intact & Segmented	51	51	\$0	\$7,389	\$65	\$368	\$1,973	\$13,712
	Subtotal LLW:	52,907	7,939	\$0	\$33,658	\$495	\$1,589	\$441,376	\$477,118

Table 4-5: 2000 km beginning in 2055

Total LLW cost shown in bottom right as \$477,118K

Corrected total LLW cost justified by cost components listed in Table 4-5 = \$340,800K

Difference: \$136,318K, 40 percent above corrected total

The ILW is not subjected to these adjustments.

We cite this information to support our concern about the inconsistency of the information, which has been presented and, also, the degree of magnification of estimates whose rationale is not explained.

In addition, the co-relation between the numbers displayed in the Table does not transfer to the visual information on the Graphs, which appear on page 80. In the above example, the graph indicates that the total expenditures would be \$538,445K.

The additive effect of not using actual locations and then not using clear data for the calculations of the transport costs completely de-values the Response report to the Minister.

The Inverhuron Committee also has questions relative to apparent inconsistencies that appear in the narrative presentation of the Response to the Minister.

One example is found in the Executive Summary from Section 4 Environmental Effects of Alternate Locations (page v), points out that "A DGR at an alternate site could be constructed without any likely

significant environmental effects” while stating in the following sentence, “However, environmental effects of a DGR at an alternate location (both sedimentary and crystalline rock) are likely to be greater as compared to the DGR Project at the Bruce Nuclear site”. The main difference quoted is the increase in radiation due to the fact that a new location would not have a nuclear presence already.

Lastly, we would like to address briefly the Gandalf Survey, which was done by OPG to seek out public opinion about their project at the Bruce site. Again, inaccuracies and inconsistencies are rampant in this information.

Section 7.1 Social License, page 71 of the response, OPG incorrectly reports that the survey showed a majority of the public support the DGR.

*In fact, the survey actually shows that only 33% of the respondents support a DGR somewhere in Ontario and that 64% of the Ontario public opposes construction of a nuclear waste dump on the shore of Lake Huron. (Slide 37)*

## **Conclusion**

The value of OPG’s Response to the Canadian Environmental Assessment Agency and the Minister of the Environment and Climate Change is diminished by the use of a regional approach to alternative locations using a general methodology based on modeling and professional judgment. This does not respond to the request made.

OPG continues to hold tightly to the premise that the Kincardine site, directly next to Lake Huron, is their preferred site for what appears to be reasons of convenience as well as the support of local politicians and a small nuclear community being handsomely rewarded for its voiced and ongoing approval.

In contrast, The Inverhuron Committee was looking for a robust scientific and evidence-based study using actual sites, outside of the Great Lakes Watershed.

In our present Submission, The Inverhuron Committee is submitting written comments on OPG’s incomplete Response document and, also, making suggestions as to other ways (separating the LLW and ILW, studying rail alternatives, holding the LLW at each site etc.) to modify OPG’s project in order to substantially reduce costs to the taxpayer and eliminate duplication of the movement of waste.

During the Joint Committee Hearing process, OPG and the CNSC continually insisted that low and intermediate level nuclear waste must be handled together as these were the responsibility of the Province of Ontario, but separately from high level nuclear waste for which the Federal Government has assumed responsibility. The Inverhuron Committee and other intervenors continue to view this as an artificial and simplistic differentiation, particularly as intermediate and high level waste share many dangerous characteristics, making them quite different from low level waste.

The new government in Ottawa appears to be more responsive than its predecessor to Ontario's request for financial assistance toward the cost of providing access to the Ring of Fire in Northern Ontario. Financial participation in this project might be even more appealing to the Federal Government, if the new transportation infrastructure also allowed access to a suitable site for the storage of high level nuclear waste. The same site or one adjacent to it could be used to store intermediate level waste and, if necessary, low level waste.

On a final note, The Inverhuron Committee believes that a project involving the permanent storage of nuclear waste requires the co-operation of both the Provincial and Federal Governments to pool resources of all types (financial, scientific/research, human resource). Exploration of the Ring of Fire in the north is an example of how infrastructure and geology can be studied together to make the best use of resources.

We encourage both the Provincial and Federal Governments to look at this project in detail and to insist that OPG comply with the requests by the Minister of the Environment and Climate Change to study actual locations, as well as cumulative effects.