

August 7, 2017

From: W. Turner

To: Nicole Frigault, Environmental Assessment Specialist
Canadian Nuclear Safety Commission

By email: cnscc.ea-ee.ccsn@canada.ca

Supplementary Comments on CNL's EIS for the Mound

CEAA Reference number: 80122

Dear Ms. Frigault:

Attached is my supplementary comment on Section 2.5.5, Site Selection of CNL's EIS report for their proposed "Near Surface Disposal Facility"
Specifically, I wish to supplement Comment Number 56 provided in my previous submission.

In summary, that previous comment was limited to discussing the fact that CNL's chosen location for their Mound Facility straddled the Emergency Road #3 (ER3).

However, I recently became aware that there is another issue with respect to CNL's chosen location and this road. CNL has identified East Mattawa Road as having cultural heritage value.

If one applies the site selection criteria, as summarized in Section 2.5.5 of the EIS, the chosen location for the mound (i.e. East Mattawa Road site) would be excluded from further consideration

This is another example of CNL's complete disregard of any standards, guidelines or processes with respect to this facility, even those it has set for itself.

Again, I request that the CNSC step in to remind CNL of its obligations to meeting both external and internal standards, guidelines and processes with respect to their proposed undertaking.

This situation continues to be unacceptable.

Regards

W. Turner

**Supplementary Comment on the EIS for the “Near Surface Disposal Facility at Chalk River Laboratories”
(CEAA Registry Number 80122)**

The Application of Site Selection Criteria, EIS, Section 2.5.5

By W. Turner (Deep River Resident)

A supplement to my comments with respect to Site Selection, EIS Section 2.5.5.

I am submitting this comment as a supplement to my Comment 56 submitted previously (See document number 97 on the Agency Registry, May 31, 2017, #119179E).

In that comment, I point out that the East Mattawa Road site straddles Emergency Road #3 (EM3). Thus, the discussion included in that comment focused on that aspect.

However, I recently became aware of another issue with respect to the selection of that site and the location of Mattawa Road. By selecting this site as the preferred location for their proposed Mound, CNL has failed to meet the site selection criteria it set for itself. These criteria are summarized in Section 2.5.5 of the EIS.

To quote from that section:

*Exclusion criteria was then applied to remove any locations that were constrained by project requirements or by pre-defined factors; **exclusion criteria are physical, cultural, and biological features that will eliminate a location from the list of potential sites because development is either not permitted or poses a risk for the intended use/project** [emphasis added]*

If CNL had applied these exclusion criteria in the site selection process, I am at a loss as to how the “East Mattawa Road” site was selected.

Below is a figure that depicts part of the NSDF Poster Number 7 from the July 2016 Public Information sessions (downloadable from the link http://www.cnl.ca/site/media/Parent/PSA-NSDF-Eng_July.pdf.)

I have highlighted several interesting features from that figure. These are:

- the legend for the Historical Roads (with the APM 50 m buffer) is a shade of yellow/orange;
- when this colour is applied to the historic roads, the East Mattawa Road is seen to pass through the “preferred site” for CNL’s Mound; and
- with respect to the “Alternative Site”, there are no instances depicted of any cultural heritage features.

Thus, I am confused as to how the site selection criteria were applied, specifically the criterion of “cultural ... features”. At least one of these features is straddled by the East Mattawa Road site whereas; none of these features located in the Alternative Site (see Figure below).

The authors need to explain the application of the CNL site selection criteria, specifically the “cultural ... features” aspect. Further, they need to explain why the “Cultural Heritage Priority” they identified in the July 2016 Posters (see figure below) was ignored when distinguishing which of the two sites is the optimal choice.

Note: What I find quite troubling is that the Figure from Poster Board 7 (July 2016) is not included in the EIS Report itself. However, this figure is provided in Appendix 4.0-1, Poster Boards, Figure 6, “Cultural Resource Management (July 2016)”. As provided in this Appendix, the details of the figure are impossible to distinguish. Therefore, a copy of the poster boards was downloaded from the link provided above such that I could better show the details (see Figure below).

A cursory perusal of that extracted figure clearly demonstrates my confusion with respect to the application of CNL’s own site selection criteria.

Supplementary Comment on the EIS for the “Near Surface Disposal Facility at Chalk River Laboratories”
(CEAA Registry Number 80122)

The Application of Site Selection Criteria, EIS, Section 2.5.5

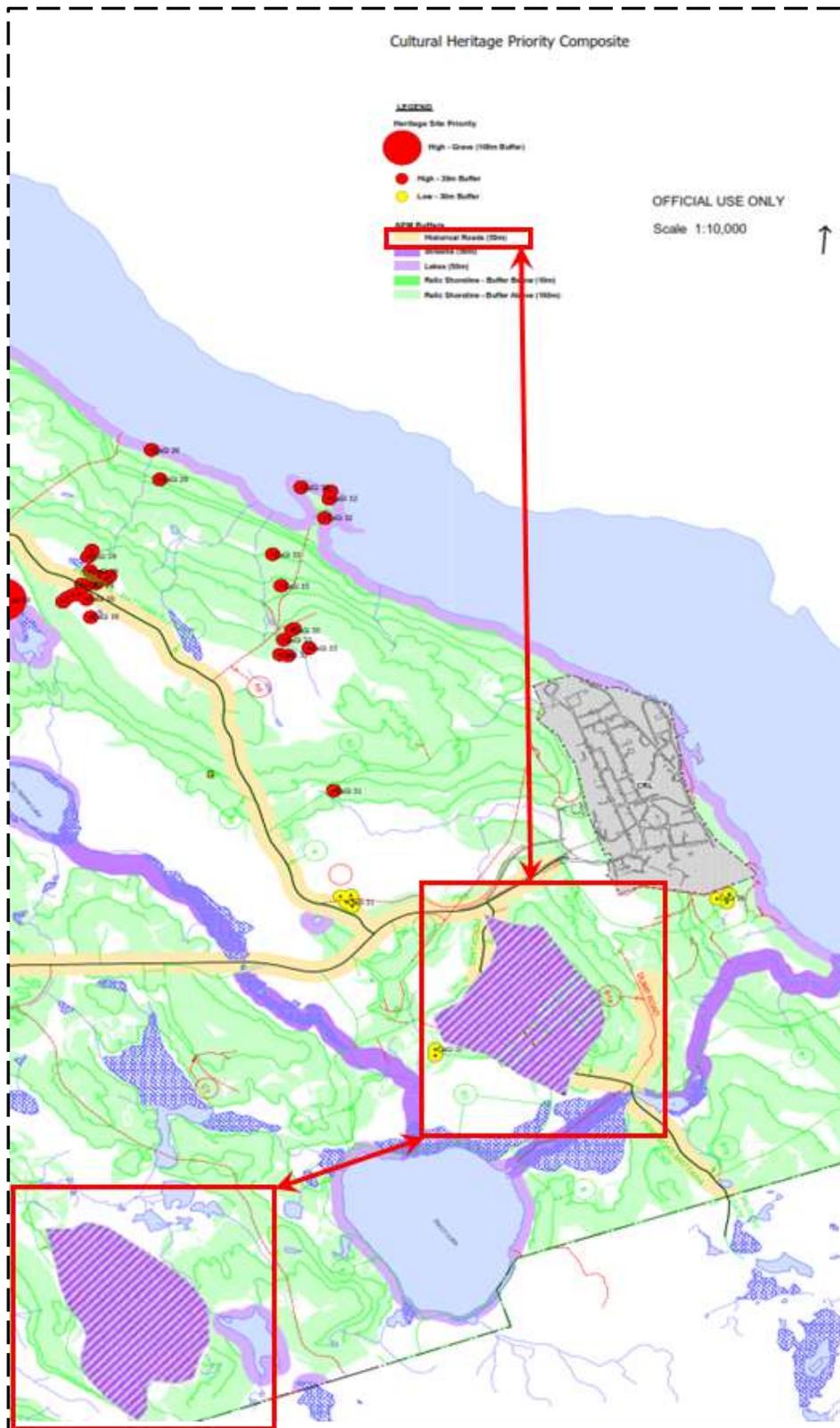


Figure Extracted from Poster 7 of the July 2016 CNL Poster Boards