



December 12, 2016

The Hon. Justin Trudeau
Prime Minister of Canada
House of Commons, Ottawa, ON K1A 0A6

Dear Prime Minister Trudeau:

The National Council of Women of Canada (NCWC), whose long-held policies support strong precautionary Environmental Assessments (EAs), respectfully requests that you intervene in a most serious matter involving public safety, health, and environmental protection. That is the pro-nuclear bias of the Canadian Nuclear Safety Commission (CNSC) as the “*responsible authority*” for nuclear-project EAs and the necessity for your Government to reinstate an unbiased Ministry-led EA process.

While NCWC will submit comments to the current EA Expert Review Panel, we are acutely aware that it was a previous government’s decision to abruptly dismiss the former CNSC Chair due to her public revelations of very serious flaws in the Maple reactor, and to appoint a pro-nuclear Chair. The subsequent 2012 delegation of EA authority gave CNSC complete control of the nuclear regulatory system, whereupon it is our view that CNSC increasingly fails to act in the public interest.

This is most clearly exhibited through CNSC’s support for such dangerous nuclear projects as Bruce Power’s shipment of radioactive steam generators through the Great Lakes (since cancelled by the proponent); Ontario Power Generation’s proposed nuclear dump on the shore of Lake Huron; and CNSC’s recent approval of a “*precedent-setting*” licence to transport extremely dangerous, long lasting, high-level liquid nuclear waste containing Highly Enriched Uranium (HEU) by land 1,800 kilometres from Chalk River to South Carolina.

CNSC insists that the shipments are required by the 2015 US/Canada agreement to repatriate weapons-grade HEU to the US, and yet Indonesia, a signatory to the same agreement, has done what Canada had planned to do until 2011, i.e., solidify and store it safely on site. **1**

All of these proposals have been strongly opposed by many U.S. State and Canadian municipally-elected officials, who represent millions of people living in the potentially affected areas, and the HEU shipments are the subject of a court challenge by a number of U.S. environmental groups, backed by the extensive scientific expertise of Dr. Gordon Edwards (Canada) and U.S. nuclear waste expert Marvin Resnikoff. **2**

At the heart of NCWC's concerns is the key lesson learned from Fukushima, i.e., that a poor safety culture can lead to disaster. In this regard, we draw your attention to CNSC's slack oversight in two key areas of their responsibility. For example, last spring the bottom of a proposed container for the transport of liquid high level nuclear waste containing HEU failed and the incident was reported a few days after the fact to CNSC. **3** And just recently the Federal Environmental Commissioner warned the Government that "*75 per cent of {sic nuclear plant} site safety inspections were carried out without an approved guide, and compared that scenario to a pilot taking off on a flight without going through a safety checklist.*" **4**

NCWC cannot state strongly enough that we firmly believe it is not in the public interest for a biased CNSC to guide and advise nuclear proponents as well as control the Environmental Assessment process, and that at present the Government can only intervene on our behalf at the very last moment, as in the case of the Bruce Nuclear dump proposal.

To conclude, NCWC reiterates our request that the federal government remove CNSC as the "*responsible authority*" for environmental assessments of nuclear proposals.

As an immediate example of your government's concern for public health and safety, and environmental protection of our communities, prime farm lands and waterways, we would also urge you to intervene to halt the HEU shipments until there has been an open public hearing to ensure all alternatives are considered, most crucially the promised down-blending and storage on-site as planned in 2011.

Sincerely,

Karen Monnon Dempsey

President

National Council of Women of Canada

Text prepared by NCWC Environment Convenor Gracia Janes

Attachments: References/Background

E-DOCS #4925601 – PDF Status Update CNL....

cc: The Hon. Rona Ambrose, Leader of the Official Opposition
The Hon. Thomas Mulcair, Leader of the NDP

References/Background:

1. [Main | Pilgrim's Progress: Inside the American Nuclear-Waste Crisis »](#)

Wednesday Nov.30 2016

[Environmental coalition rebuts DOE attempt to have case dismissed re: highly radioactive liquid waste truck shipments](#)

Buffalo, New York, as well as Thousand Island, New York, are the most likely border crossings for these shipments. However, others could be used as well. DOE has invoked secrecy regarding the routing and timing of shipments, on security grounds. On Nov. 22nd, Diane Curran of Washington, D.C. and Terry Lodge of Toledo, OH -- legal counsel for an environmental coalition that includes Beyond Nuclear -- filed a motion in the Washington, D.C. federal district court, entitled *MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT* ([see corrected version, dated Nov. 29, 2016](#)).

[Dr. Gordon Edwards](#) (Canadian Coalition for Nuclear Responsibility) and [Dr. Marvin Resnikoff](#) (Radioactive Waste Management Associates) provided expert declarations in support of the coalition's case (click on links at their respective names, above, to see the declarations).

In short, Dr. Edwards testified that a mere couple of ounces, out of just one of the 150 shipments, could radioactively contaminate the massive Georgetown Reservoir, the drinking water supply for the District of Columbia, at very unsafe levels, rendering it unsafe to drink. Dr. Resnikoff testified that the woefully inadequate standards for seals, valves, and O-rings on the jury-rigged shipping containers risks failure and leakage, even in the event of a below-design basis fire temperature and duration.

This is the latest filing in the environmental coalition's challenge against the U.S. Department of Energy's (DOE) unprecedented scheme to truck highly radioactive liquid wastes. 100 to 150 high-risk truck shipments -- from Chalk River Nuclear Lab, Ontario, Canada to Savannah River Site, South Carolina, U.S.A., more than a thousand miles -- could begin as soon as mid-February, 2017 if the DOE gets its way, and the legal appeal dismissed. The most likely border crossing points include Buffalo and Thousand Island, NY, although DOE is keeping routes and timing secret under a cloak of security.

2. **Dr. Gordon Edwards. March 19th 2016. e-mail**

"In 2011, the Canadian Department of Natural Resources reported that the liquid material in the FISST tank would be "*down-blended*" on site at Chalk River to remove any nuclear bomb-making security risk there might be, and in the licensing application submitted in 2011, Chalk River Laboratories (CRL) declared that it was planning to solidify the material

on-site using a process of "cementation". For the last ten years, high-level radioactive liquid waste of the same composition has been successfully cemented and stored at Chalk River without shipping the liquid or the solidified material offsite."

3. CNSC Official Report of Container Failure- attached

4. Toronto Star Article October 4th 2016

In a report released Tuesday, Commissioner of the Environment and Sustainable Development Julie Gelfand finds a number of failings at the Canadian Nuclear Safety Commission, the agency responsible for ensuring nuclear plants are safe and secure.

Gelfand said "I think it's pretty serious," she said Tuesday at a news conference across from Parliament Hill. "This kind of lack of precision in a precision industry I think is really not acceptable," she said. "These mistakes should not happen when we're dealing with nuclear power plants." Her report said the CNSC could not demonstrate that its inspection plans included the appropriate number and types of inspections, or that it had the staff needed to verify that nuclear power plants were complying with requirements.

She said there were errors and incomplete information in the database, recording inspections had been done when they had not been done, and in other cases showing inspections as incomplete when they had in fact been completed.

Inspections not recorded

The report also raises questions about staffing and whether the CNSC has enough inspectors to carry out its mandate.

"While senior management told us that they believed there were enough inspectors and that more were reassigned as issues arose, we were told by site inspectors and site supervisors at every nuclear power plant that there were either not enough inspectors at their sites or not enough at the levels needed," the report says.