

WILLIAM LEISS

LIST OF REFERENCES FOR NWMO ERRORS AND OMISSIONS IN THE BOOK *DEEP DISPOSAL*

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1. Pages 30-21: “And there was no professional who was who was also a member of a first nation [or who had special expertise in Aboriginal treaties or the concept of “traditional territory”] on the Assessment Team. It is impossible to speculate on what kind of difference such a person might have made to the team’s report, *Assessing the Options*; but, given what has happened to the NWMO’s search for a DGR site over the following twenty years, as the issues related to the traditional territories of Indigenous peoples gradually came to the fore, that difference might have been a substantial or even a decisive one.”
2. Page 37: “But the federal government has never recognized the need to change its legal requirements, which are managed by CNSC, for the authorization of any nuclear facilities. As Chapter 5 will show, CNSC’s licensing processes ignore the Seaborn/NWMO innovations. *Only* technical feasibility, based on site geology and engineering, really matters in regulatory review for the construction of a DGR facility. This contradiction persists, even as the NWMO prepares to submit for approval a chosen DGR host *under CNSC rules*. Left unresolved, it could undermine the legitimacy of the NWMO’s entire site selection process.”
3. Page 73: “Thus it is interesting that, so far as I can ascertain after a careful study of that section of the NWMO website dealing with a potential site in South Bruce, there is no transportation study comparable to the ones done with respect to most or all of the other twenty candidate sites (see chapter 4).”
4. Page 73: “In this context the NWMO’s abrupt late-2017 decision to terminate consideration of “Blind River, Elliot Lake and Area” as a suitable DGR host appears to be arbitrary, and the decision is not at all well explained in the documents.”
5. Page 85: “Inevitably, the developments around new nuclear will have significant impacts on the used fuel waste scenarios that underlie the NWMO’s search for a DGR site with a willing host community on side. There will be major impacts in terms of amount and types of waste and on the time frame for operation of the DGR before final closure. These impacts must at some point be reflected in new scenarios devised by the NWMO.”

6. Page 86: “In December 2021, the NWMO issued its ‘Preliminary Transportation Plan.’ ... [This document] is also seriously inadequate in some respects, especially in that it never compares the available modes of transport in terms of their risk profiles and never explains that, in a Canadian context, there three, not two, available modes: road, rail, and water.”
7. Page 96: “The NWMO needs to carry out proper quantitative risk assessments of all three of these potential transportation modes [road, rail, water] and use those results in wider public discussions of alternative scenarios.”
8. Page 118: “It seems to me to be a serious mistake if the sedimentary rock alternative were to go forward to a licensing hearing conducted by the CNSC in the absence of a full and comparative quantitative risk assessment with respect to the safety case of the two different geological formations [sedimentary rock and granite], a study that, ideally, had been delegated to and completed by an independent expert panel.”
9. Page 144: “In particular, the JRP [Joint Review Panel] made no use whatsoever of the elaborate list of either the ‘issues’ or the ‘rights’ raised by the First Nations and Métis Peoples who participated in its processes in its praise of OPG’s ‘safety case,’ ... There is every reason to believe that the same sequence of events will unfold when the CNSC examines the safety case for the proposal for a DGR for used nuclear fuel submitted to it by the NWMO.”
10. Page 148: “After the NWMO completes its lengthy period of work and recommends a DGR site, it will be up to two actual federal agencies, the Canadian Nuclear Safety Commission and the Impact Assessment Agency of Canada, to conduct the proceedings that may result in the legally authorized licensing, construction, and operation of an actual facility... Thus it is safe to assume that the ultimate CNSC/IAAC final decisions may well modify the details of any prior agreements made between the NWMO and both a municipality and an Indigenous community – or ignore them entirely because they are merely ‘arrangements between private parties’”
11. Page 152: “Every one of these lessons [outlined just above] from Kincardine is directly relevant to the situation facing the NWMO at this time as it continues to look at Ignace and South Bruce.”
12. Page 160: “In neither case [Ignace or South Bruce] is there any mention of a single joint activity involving both the Indigenous and non-Indigenous partners.”

13. Pages 173-4: “Looked at now in retrospect, in 2024, the NWMO’s basic strategy in beginning its site selection process by waiting to hear from potentially interested small municipalities was too passive an approach.... Would it not have been far better, then, to have made First Nations communities the first point of contact in the site selection process and to have ignored the idea of a non-Indigenous municipal host entirely?”
14. Page 175: “But there is absolutely no reason the NWMO could not have arranged, by this time, to complete and publish those [four types of] risk assessments on its own authority, and I simply cannot understand why this has not yet been done.”
15. Page 177: “Should we expect [in the light of what happened earlier with respect to the evaluation of the proposed Bruce DGR] that any agreement between the NWMO and a First Nation will once again be deemed to be irrelevant at a later stage of the site selection process?”
16. Page 179: “As we have seen, since 2023 the NWMO has given first rank to the Indigenous community partner in the last two remaining candidates for siting a DGR (WLON [Ignace area] and SON [South Bruce area]). If the Indigenous views cited just above [by the commentator Anna Stanley] are still current in the WLON and SON communities, is the NWMO taking them into account?”
17. Page 181: “Is it appropriate, I wonder, for an organization [NWMO] committed to an ethical approach in its mission to simply ignore, on the public record, the relevance of the DGR siting to the continued suffering of these Indigenous peoples nearby [on the Grassy Narrows reserve], whose fate has been determined so drastically by an earlier industrial project?”