

From: Kevin Kamps, Radioactive Waste Watchdog, Beyond Nuclear

To: Marc Leblanc and Louise Levert, CNSC

Date: November 22, 2010

Re: Additional comments on Bruce Power's proposal to ship 16 steam generators from Ontario to Sweden via the Great Lakes, connecting rivers, and the Atlantic Ocean for so-called "recycling"

Dear CNSC,

On Nov. 16, 2010, I testified on behalf of 168 national and grassroots environmental and public interest groups to the U.S. Department of Energy's Blue Ribbon Commission on America's Nuclear Future. Although focusing on irradiated nuclear fuel and high-level radioactive waste, our coalition's broad principles regarding safety, security, environmental and public health protection also would apply to this proposed shipment. Our groups call for hardened on-site storage (HOSS) at reactor sites, when and where feasible, as a safer alternative to risky transport and away-from-reactor activities. This would certainly apply to this risky shipment, being carried out for no good reason whatsoever – so-called "recycling" of radioactive metal into the consumer product stream. My testimony and the group statement can be viewed at:

<http://www.beyondnuclear.org/home/2010/11/15/kevin-kamps-and-susan-corbett-testified-nov-16-at-blue-ribbo.html>

Along these same lines, 170 groups, representing all 50 US states, have endorsed the Statement of Principles for Safeguarding Nuclear Waste at Reactors, calling for hardened on-site storage (HOSS) as an interim measure that serves as an alternative to risky transport and away-from-reactor radioactive waste management activities. Again, although focused on irradiated nuclear fuel and high-level radioactive waste, HOSS principles can and should be applied to this Bruce Power proposal as well. The Statement of Principles and its list of signatory groups can be viewed at:

[http://www.ieer.org/reports/DOE\\_WasteContracts2010/HOSS\\_PRINCIPLES\\_3-23-10x.pdf](http://www.ieer.org/reports/DOE_WasteContracts2010/HOSS_PRINCIPLES_3-23-10x.pdf)

I remind the CNSC that Canadian-U.S. environmental coalition Great Lakes United (GLU) has issued a resolution in opposition to this risky proposed shipment and so-called “recycling” plan. The resolution is posted at:

[http://www.ccnr.org/Resolution\\_e.pdf](http://www.ccnr.org/Resolution_e.pdf)

The endorsers of the GLU resolution can be viewed at:

[http://www.ccnr.org/Resolution\\_NGO\\_sort.pdf](http://www.ccnr.org/Resolution_NGO_sort.pdf)

Detailed commentary on the 249 page long CNSC supplemental filing was not possible in the arbitrarily short amount of time CNSC has allowed for public comment. For that reason, further detailed comments will be submitted as soon as possible, with the sincere request that CNSC consider them, despite their submission after CNSC’s arbitrarily short deadline. The rush to approve this risky proposal is unacceptable, given the risks to the Great Lakes – 20% of the world’s surface fresh water, and drinking water supply for 40 million people.

Sincerely,

Kevin Kamps, Radioactive Waste Watchdog, Beyond Nuclear

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abandon both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.