



THE NATIONAL COUNCIL OF WOMEN OF CANADA
LE CONSEIL NATIONAL DES FEMMES DU CANADA

The Honourable Jim Prentice
Minister of Environment
House of Commons
Ottawa, Ontario

October 8th, 2010

Re: Opposition to the Bruce Power Application to the Canadian Nuclear Safety Commission for Permission to Ship 16 Radioactive Steam Generators from its Nuclear Reactors on Lake Huron to Sweden- and a Request for an Environmental Assessment of Same

Dear Minister Prentice,

The National Council of Women of Canada (NCWC) is writing this letter to you regarding a very important issue for Canadians, particularly those living in towns and cities along the Great Lakes/St. Lawrence Seaway, but also Americans who live in this same area, and the millions who rely on the Great Lakes for their water supply. That is, the application to the Canadian Nuclear Safety Commission (CNSC) by Bruce Power to ship 16 very large deteriorating, radioactive steam generators from its nuclear reactors at its Lake Huron site of operations, through the Great Lakes and along the St. Lawrence River and by ocean to Sweden, for recycling and sale into an unrestricted market.

While several of NCWC's affiliated member groups based in the Great Lakes /St. Lawrence Seaway Area e.g. Provincial Councils of Quebec and Ontario, Local Councils in Quebec and Ontario, may well be heavily impacted should an accident happen as the radioactive materials are transported, the Provincial Council of Women of Ontario has taken the lead on this issue as the bulk of the shipping in Canada will be through its many towns and cities along the route and bordering Lakes Huron, Erie and Ontario.

NCWC's support of the Provincial Council of Women of Ontario's strong opposition to this very dangerous proposal, is based on our long standing policies supporting a phase-out nuclear power and the use of the "*precautionary principle*" when assessing projects that may well put human health and safety and the environment at risk.

We note that NCWC and PCWO are not alone in objecting to Bruce Power's plan, as over 80 groups and individuals have sent objections to the CNSC, or presented their views at its September 28 and 29th hearing, and letters of concern have been sent to the CNSC and yourself as Minister of environment by elected officials of many Towns and Cities along the proposed route, and a group of 7 Great Lakes US Senators.

Many Canadian Mayors have been very concerned with the threat of accident along the route, particularly the threat to drinking water supplies for millions of people, and it is quite shocking to us that Bruce Power's CEO has admitted that his company has no emergency plan in the event of a ship sinking. Recent media reports also indicate that there is as yet no plan for dealing with winter weather conditions on the roads the trucks carrying the radioactive materials are to travel.

For their part, the American Senators are seeking assurances regarding such issues as the CNSC standard of review, the International Atomic Energy Association (IAEA) limits and standards for total radioactivity per shipment and the need for independent peer review of the information. These latter two points are key issues for National Council of Women of Canada and were called for in the submission of the Provincial Council of Women of Ontario, which noted Canada's outdated standards and that all relevant information came from the proponent Bruce Power, as verified by CNSC Staff.

These concerns are certainly justified, as it has been brought to our attention by independent scientist Dr. Gordon Edwards, that on September 27th, the CNSC Staff reported in their "*additional filings*" that the radioactive inventory of the steam generators had been underestimated by about 50% and the external gamma dose rate had also been underestimated by a significant amount. It is our understanding also, that the original staff data shows that the total amount of radioactivity exceeds the International IAEA Standard by 50 times for inland waters and 6 times for open oceans. The new data shows that the radioactivity would exceed these standards by 75 and 9 times respectively. Given this new data and the huge concern by so many communities around the Great Lakes, it is appalling to think that the Bruce proposal was to be approved by a single CNSC staff person before huge public pressure resulted in a 2 day CNSC hearing .

Finally, NCWC is strongly supportive of PCWO's views that approval of the Bruce Power proposal could well lead the way for the routine import, export and transport within Canada, by road, highway and water, of radioactive wastes, some of which emit very dangerous and long-lived radiation and are of immediate and long term danger to workers, the general public and the environment in transit or in case of an accident; that Bruce Power should abide by its 2006 Environmental Assessment agreement and deal with this nuclear waste at its Ontario Power Generation Western Management Facility ; and, that in the public interest the proposal should be subject of a complete Environmental Assessment, or at least a new hearing based on correct information.

Sincerely,

Mary Scott, President NCWC

The National Council of Women of Canada is a federation comprised of Local Councils, Provincial Councils, and National Organizations. Founded in 1893, it was incorporated by an Act of Parliament in 1914 and has been designated by the Government of Canada as being of national historic significance for its role in Canadian women's history. For more information, consult our web site at www.ncwc.ca.