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M. J. Blair Seaborn
Président
Commission d'examen du concept de gestion et de stockage
des déchets de combustible nucléaire
Agence canadienne d'évaluation environnementale
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Monsieur le président,

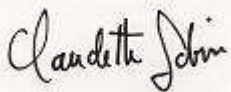
Ayant pris connaissance du rapport d'Énergie atomique du Canada Limitée: " Étude d'impact sur l'environnement concernant le concept de stockage permanent des déchets de combustible nucléaire du Canada" et du Rapport du Groupe d'examen scientifique, nous soumettons à l'attention de votre commission le mémoire ci-joint de la Ligue des femmes du Québec.

La sécurité du public doit primer sur tout. A cet égard, la situation immédiate est extrêmement inquiétante. L'entreposage des déchets de combustible nucléaire sur les sites des centrales n'est pas protégé adéquatement contre les attaques des terroristes et des malfaiteurs et cela est inadmissible. Quant au stockage à long terme, le diagnostic, les tests et les solutions doivent tenir compte d'un plan continental nord-américain. Cela nous semble évident pour un projet d'une durée exceptionnelle.

J'apporterai la version française de notre mémoire lors de ma comparution aux audiences à Pickering, à la fin mars.

Veillez agréer, Monsieur le président, l'expression de mes salutations distinguées

La présidente



Claudette Jobin

SUBMISSION TO THE ENVIRONMENTAL ASSESSMENT PANEL
ON THE NUCLEAR FUEL WASTE DISPOSAL CONCEPT

1.0 INTRODUCTION

La Ligue des femmes du Québec was founded in 1957 to address women's issues. In 1995, recognizing the wider scope of the educative action that is now required, its members helped establish La Fondation des femmes pour la société et l'environnement.

In this paper, we will expose the major flaw in nuclear management i.e. Canadian denial of problems. The viability of any disposal plan designed and managed separately from our American neighbours will also be questioned.

2.0 CANADIAN DENIAL OF PROBLEMS

2.1 Historical Perspective

Planning to avoid catastrophe does not come easy: for instance, 10 000 persons had their house burned in the great Montreal fire of 1852, and soon after, a very stringent building code was edicted by the city. The lesson was lost on many other cities, though, because, without fear or greed, human motivation is usually dormant.

Indeed, for want of by-laws similar to those of Montreal - or many European cities - Chicago was almost destroyed in 1871. Only then did an American building code become acceptable to the many irresponsible people who, in the name of ideology, equated safety measures with abuse of power.

The Challenger Shuttle Accident, ten years ago, provides an other enlightening and frightening example of reality denial.

While Von Allen - a major scientist, respected the world over - had denounced in THE SCIENTIFIC AMERICAN, well before the accident, the "Hollywood mentality" which was poisoning the NASA decision making process, nobody took notice before January 28, 1986 - the date of the explosion.

Furthermore, Richard Feynman - Nobel laureate and member of the Challenger Inquiry Commission - proved in its minority report, which was included in his book "WHAT DO YOU CARE WHAT OTHER PEOPLE THINK?", that top management of NASA was using risk figures a thousandfold more optimistic than what they were in reality: the risk of catastrophic failure was officially said to be 1 in 100 000, but it was in reality closer to 1 in 100.

After the disaster of 1986, NASA stopped the denial and partially amended its ways. According to the NEW YORK TIMES edition of 1996 01 28, after hundreds of improvements, a study made by the Sciences Applications International Corporation established that, with the enhanced safety measures, the chance of Shuttle disaster was now most probably 1 in 145, still a far cry from the hyper-inflated PR figure used until reality struck.

2.2 Canadian Blindness to Immediate Problems

Canada has let develop in the current storage of radioactive wastes a situation comparable to that of Chicago vs Montreal in 1870: the level of protection against terror bombs that is mandatory in the US is considered superfluous in Canada.

Car or truck terror bombs were once thought too exotic for North America. After the World Trade Center and Oklahoma City attacks, though, it became evident that the maximum precautions should be in place to protect North American nuclear sites.

While the US Nuclear Regulatory Commission ruled in 1994 that every American nuclear site should have in place, as of March 1st, 1996, full protection against truck bombs, in Canada, procrastinators and deniers refuse to see the problem.

There is no point in studying hypothetical risks factors for conditions a thousand year from now if we cannot realistically assess the possibility of an attack on the huge nuclear plant of Pickering, just east of Toronto, where 15% of Canadians live.

Dr. Agnes Bishop, president of the Canadian Atomic Energy Control Board, said in the attached letter, dated December 18, 1995 (see APPENDIX I), that "The threat situation in Canada is seen as being quite different from that which confronts the US." This is dangerous wishful thinking!

Consider that, because Pickering is quite close to Buffalo, its being less protected than American facilities has now generated a very real possibility that some terrorists trying to harm US citizens will come into Canada, following the "least resistance path".

Blissfully ignoring this most predictable consequence of the higher level of protection now required in the US, Dr. Bishop wants us to feel secure in relying on nothing more than the monitoring by the "Canadian law enforcement and security agencies".

This is far from reassuring: last fall, the agents of the Royal Canadian Mounted Police who were on site, pretending to protect the Official Residence of the Prime Minister of Canada, failed miserably to stop a deranged intruder armed with a knife. Then they took an eternity to react to Aline Chrétien's telephone call for help. As for CSIS, the intelligence agency where they seem more apt at bugging harmless citizens or inventing conspiracies that dealing with real hard facts, we don't count on them either.

So, what are we supposed to do? Pray? Not much of a solution in the nuclear age, is it? Instead, we did obtain copy of the new US Regulatory Guide 5.68*, copy of which was sent to Hydro-Québec and Ontario-Hydro presidents as well as to Quebec Prime Minister Office (see APPENDIX II for letters sent and answers received).

Fortunately, Gentilly, Quebec's only nuclear plant, is farther from Montreal than Pickering from Toronto. Nevertheless, with federal ministers almost calling to arms, these days, we insist that all precautions be taken instead of risking a mess nobody would be able to mop up for centuries.

COMPLIANCE WITH OBSOLETE RULES IS NOT THE OBJECTIVE! THE OBJECTIVE FOR ALL PARTIES CONCERNED IS TO MAKE SURE THAT NO COMPROMISE IS MADE ON THE PROTECTION OF THE PUBLIC.

In case an outside witness would be of assistance, the NEW YORK TIMES energy specialist, Matthew L. Wald, was notified of our concern about official apathy (see APPENDIX III).

2.3 Over the Long Term

Of course, nuclear wastes are a "permanent" responsibility that must be addressed. However, for a country like Canada with a population about the same as California, enjoying a 30 year-old auto pact and 5 year-old free-trade agreement with its mighty neighbour, which is already providing most of our technological and cultural products, how practical or realistic would be a "solo" solution?

The Canadian nuclear industry was a clear manifestation of national assertion and there is a sobering lesson in its dubious results: the tag price of this fulfilled dream is extremely high, compared to what was first assumed!

It would be timely to face what we have been denying for much too long, despite the facts: apart from the nuclear industry, the structure of the Canadian business does not depend a lot on Canadian decisions. Detroit, Dallas, or Microsoft and IBM headquarters, have often more bearing on our destiny than Toronto or Ottawa. And this is far from new..

Nobody can deny that the Father of Canadian Industry, C. D. Howe, was an engineer born and trained in the USA. Taking advantage of the panic Pearl Harbour had created, Howe obtained from the White House that 10% of the American war effort would be produced in Canada, a major shot in the arm for Canadian industry. In addition, Howe also created 2000 Crown Corporation but always pictured himself as opposed to socialism. C.D. Howe political career ended with the natural gas pipeline affair: a so-called Canadian project designed and financed by Texans while running South of the Great Lakes.

* available upon request

After World War II exceptional growth years, Canadian industry was further sustained by many decisions made in Washington by an administration acting to protect US best interest. To name but a few: the formation of Alcan, split from Alcoa, the separation of Nortel from Western Electric, the Iron Ore mining investment, the DEW line etc...

3.0 CONCLUSION

Any long term project denying the real impact of Americans on our decisions cannot be anything but an academic exercise in futility. The taxpayers are too broke, these days, to tolerate rounds and rounds of Byzantine hair splitting.

Let's concentrate on improved safety measures for nuclear waste today and stop the paper shuffling until Washington is ripe for a continent wide approach to the diagnosis, trials, and solutions.

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