

The Choosing the Way Forward document represents a major effort to describe the thoughts of Canadians on the topic of nuclear fuel disposal. The approach of consultation is important but the effort must go hand in hand with education, if there has been a failing in the waste management programs of Canada to date this would be it. In order for people to make a decision on whether or not to host a repository they must have accurate information on what is proposed and what it is based on (geology, natural analogues, etc.). Thus the report should mention that education must be a clear component of the process. It will allow people to make informed choices instead of just hearing the rhetoric of groups that oppose technology and solutions because they include the word nuclear.

Canada is fortunate that it may learn from countries such as Sweden in dealing with education and consultation, but it is also clear that the solution must be made in Canada and not only reflect the views of Canadians but that Canadian expertise must lead the way.

In reading the Choosing the Way Forward document, I noted a number of areas that require either further detail or need to be added.

- I believe that more weight must be given to the current generation taking responsibilities for decisions in the program. Leaving too many large decisions for future generations is an invitation to inaction in the present.
- I believe the time to closure of the repository outlined in the document is overly long and probably will produce large costs that are not needed for safety.
- At the front end of the process more details need to be provided for the siting process and keeping technology current. A long process involving one or more generations requires the current generation to pass that knowledge on. This is another component of the education process.

In keeping with greater details at the front end of the process I would suggest some modifications to the Adaptive Phased Management (APM) approach.

If APM is selected, once the government returns its approval for the process of long-term management of used fuel, consultative siting activities should begin as soon as the implementation agency is formed, this should occur within a year to continue momentum.

Much information has been gathered on technical details so a generic repository design should be immediately issued by this new organization (within one to two years) and a call for volunteer host communities issued. The volunteer site method has proven to be successful in Canada for the Port Hope site. If no volunteer host community were found a selection of alternate sites would be vetted.

During this period of site selection the existing Underground Research Laboratory (URL) in Manitoba should be developed as a demonstration facility in order to show interested

groups and the public in general about the concept. The URL would also provide a training ground for the future generation of scientists and engineers for the repository. General design and safety assessment would continue.

Once a site is selected either from a volunteer community or other location, site characterization would begin at and then follow with specific design development. The site selection and characterization should be accomplished in ten years. During this time regular consultations with shareholders, especially host community members should continue.

Once sufficient knowledge is developed about a site to have confidence in its suitability development of a limited portion of the repository should be undertaken. A heavily instrumented test emplacement of actual used fuel should be installed and monitored as a demonstration. Because of the effort needed to develop the needed facilities a test emplacement likely could take place between 20 to 30 years from the start of the process rather than 60 years.

At this point in time a period of reflection could occur as the test emplacement is being monitored. In order to keep costs reasonable, excavation of the repository would continue.

The operating license for the repository would then be obtained based on knowledge of the test installation and final approval granted. At the back end of the process, leaving the repository unsealed for long periods is not necessary in my opinion.

At the period of site selection, test installation, repository licenses and repository sealing there are points available for decisions to proceed but there is also not unnecessary delay. Education is key; many groups exist that excel in providing misleading or erroneous information. A decision to proceed at the outset means that the public and host communities have the need and the right to the facts on a repository.