



NUCLEAR WASTE
MANAGEMENT
ORGANIZATION

SOCIÉTÉ DE GESTION
DES DÉCHETS
NUCLÉAIRES

Implementing Adaptive Phased Management 2012 to 2016



What We Heard – Comments Received
About *DRAFT PLAN*

MARCH 2012



Introduction

Every year since 2007 when the Government of Canada selected Adaptive Phased Management as the preferred approach for the safe long-term management of Canada's used nuclear fuel, the Nuclear Waste Management Organization (NWMO) has published a five-year strategic plan. Titled *Implementing Adaptive Phased Management*, the Plan describes how the NWMO will implement Adaptive Phased Management in the planning period. The NWMO invites all interested individuals and organizations to get involved in the long-term management of used nuclear fuel. To encourage public review and comment, the Plan is distributed by mail to 2,500 individuals and organizations that had previously expressed interest, and is posted on the NWMO's website with an invitation to comment by making a submission, sending a letter, completing a web survey or filling out the comment form.

The purpose of this document is to report on the comments received from more than 65 individuals and organizations about the most recent Plan, *Implementing Adaptive Phased Management 2012 to 2016 – Draft for Public Review*, and how the NWMO will take these comments into account in work going forward.

Five questions were identified for consideration during review of the Plan:

1. The draft Plan is built around seven strategic objectives. Are the objectives that we have identified appropriate? Have we missed key areas?
2. The draft Plan identifies work and activities we propose to undertake to accomplish these objectives. Have we set out appropriate activities?
3. The draft Plan is intended to anticipate the challenges ahead and plan for them. Over the next five years, what are the key challenges that will need to be addressed?
4. What will the NWMO need to put in place to respond to these challenges?
5. Other comments, questions or suggestions?

The NWMO greatly appreciates receiving comments and suggestions about its work programs and plans. We continue to welcome your thoughts as we move forward together to implement Canada's plan for the long-term management of used nuclear fuel.

Overview of Key Refinements

Overall, comments about the strategic objectives were generally positive, and most people found the objectives and associated activities appropriate. The table that follows briefly summarizes the key refinements made to the draft plan in response to comments received and the ongoing work of the NWMO. Comments and suggestions that were received about challenges that need to be addressed going forward are summarized and discussed later in this document.

Page number (Refined Implementation Plan)	Comment received and refinements made
Page 1	Update made to the text to reflect this document is no longer a draft for discussion, but 'final'.
Pages 2 and 3	<p>It was suggested that the plan does not give enough prominence to safety and that an eighth strategic objective focused on development and implementation of plans to ensure both public and worker health and safety should be added.</p> <p>Discussion has been added to highlight that safety is an overarching consideration of all the NWMO's work. The Vision statement was added to the top of page 3 to further emphasize the overarching commitment to safety.</p>
Page 2	<p>It was suggested that the NWMO specifically state that it will meet or exceed all applicable <i>Canadian and international</i> regulatory standards and requirements.</p> <p>Such an adjustment would reflect the commitment of the NWMO, and this clarification has been added to the text.</p>
Page 5	<p>It was suggested that specific reference be made to the <i>Federal Nuclear Emergency Plan</i> and the <i>Federal CBRNE Resilience Strategy for Canada</i>.</p> <p>The reference has been added.</p>
Page 7 and throughout	<p>It was suggested that mentions of <i>nuclear waste</i> and <i>waste owners</i> be replaced with more specific mention of <i>used nuclear fuel</i> and <i>used nuclear fuel owners</i> to ensure greater clarity.</p> <p>The NWMO continues to reflect the wording of the <i>Nuclear Fuel Waste Act</i> in its plans, and for this reason, not all references to <i>nuclear waste</i> have been changed although some edits have been made to improve clarity.</p>
Pages 11 and 12	<p>It was suggested that the NWMO's priorities for 2012–2016 were unclear – specifically, were all the strategic objectives considered “priorities”?</p> <p>The seven strategic objectives reflect the priorities of the NWMO for the next five years. Refinements have been made to the text to bring about greater clarity.</p>

Page number (Refined Implementation Plan)	Comment received and refinements made
Pages 12 and 19	<p>It was suggested that greater clarity is needed on time frames involved in implementing Adaptive Phased Management.</p> <p>It is expected that the individual communities involved in the site selection process will proceed through the process at a pace and in a manner that reflect their needs and preferences. The process is designed to be flexible and adaptive and to allow individual communities to be at different points in the process at any given time. However, in order to bring greater clarity to the general time frames that are expected to be involved – and in particular, to complete the scientific and technical studies which are required components of the decision-making process – a general timeline for the nine-step site selection process was added to page 12, as well as a graphic at the bottom of page 19 that focuses specifically on feasibility study activities.</p>
Pages 13, 14 and 15	<p>It was suggested that there should be more emphasis on youth in the activities of the NWMO.</p> <p>The NWMO recognizes the importance of involving youth; the implementation of Adaptive Phased Management will span many generations, and knowledge must be transferred from each generation to the next. In order to highlight this commitment, refinements were made on pages 13, 14 and 15.</p>
Page 17	<p>Mention of regional engagement as a focus of Step 3 activities was added to reflect refinements in the NWMO’s thinking.</p>
Pages 18, 21, 24 and 25	<p>A number of commenters suggested that the plan does not adequately reflect the importance of transportation considerations.</p> <p>The NWMO recognizes the importance of working with transportation communities in addressing their questions and concerns, and the need to build confidence in our ability as a society to transport used nuclear fuel safely. In order to make clearer the importance of appropriately addressing transportation considerations in the plan, a number of refinements were made to the text.</p>
Page 18	<p>It was suggested that the transport of used fuel should be considered on a broader scale than simply impacts on interested communities and the surrounding area.</p> <p>The NWMO understands the importance of building confidence in the ability to transport used nuclear fuel safely, more generally, and a general reference was added to the text to reflect this understanding.</p>
Pages 20 and 21	<p>It was suggested that the description of activities in the siting process is too general. Although the plan provides more detail in the work than the previous year, and outlines extensive outreach and consultation activities with various stakeholders, it was suggested the activities in the siting process are still at a high level and conceptual.</p> <p>Within the general framework of the site selection process outlined in <i>Moving Forward Together: Process for Selecting a Site for Canada’s Deep Geological Repository for Used Nuclear Fuel</i> (May 2010), the detailed activities at each step of the process are intended to be collaboratively developed with communities in the site selection process. This is in order to ensure the specific preferences and needs of communities are addressed at each stage. During 2011, the NWMO worked with communities to understand their needs and preferences going forward, and from this, emerged a more detailed plan for the conduct of activities for Step 3 of the site selection process. A brochure was developed, an extract of which has been added to the text of the plan to provide more detail on planned activities.</p>

Page number (Refined Implementation Plan)	Comment received and refinements made
Page 22	<p>It was suggested that clarification be made to the reference to the postclosure safety assessment to specify its focus on the deep geological repository.</p> <p>This refinement was made to enhance clarity.</p>
Page 24	<p>An edit was made to the wording of the strategic objective to reflect refinements in the NWMO's thinking.</p> <p>It was suggested that the need to both provide information to and receive information from waste producers be recognized in order to ensure strong life-cycle management. A refinement was added to the text to underline the need for ongoing communication.</p>
Page 25	<p>It was suggested that a specific reference to assessing used fuel transportation modes should be made on page 25.</p> <p>Conducting transportation studies will be an important activity over the next five years. An additional reference was made on this page to clarify the commitment to this activity during the planning period.</p>
Page 26	<p>A number of suggestions were received concerning clarifications to the descriptive text on this page.</p> <p>Designed to provide a fact-based description that is understandable to a general audience, this text was reviewed, and refinement was made to ensure greater clarity.</p>
Page 27	<p>Clarification about the costs of Adaptive Phased Management was requested, and this text was updated.</p>
Page 30	<p>It was suggested that reference to the year 2011 be added to the discussion of events in Japan.</p> <p>Refinements were suggested to clarify language with respect to working with Traditional Knowledge holders.</p> <p>These refinements were made.</p>
Page 32	<p>It was suggested that reference to the Ontario Power Generation low and intermediate level waste deep geologic repository is confusing.</p> <p>This reference has been omitted.</p>
Page 34	<p>It was suggested that <i>information management</i> be added as an expertise that will be required.</p> <p>This reference has been added.</p>

Input on Key Challenges

The NWMO received thoughts about the ongoing challenges and issues that will need to be addressed in the next five years as part of implementing Canada's plan and that will need to be considered in the development of future plans. These comments help to continue the conversation about some of the ongoing challenges that need to be addressed in implementing the strategic plan, and form part of the ongoing conversation to direct and refine the plan over time.

- » **Build confidence in the safety of transportation of used nuclear fuel:** Addressing the concerns of transportation communities continues to be seen as a key challenge going forward. Comments included questions about whether it will be possible to earn the support of these communities. Ensuring appropriate involvement of Aboriginal peoples is also an area of concern.
- » **Sustain openness and inclusiveness throughout implementation:** Comments underlined the importance of the NWMO continuing its policy of openness and public consultation in its work. As dialogue becomes more focused on potentially interested communities, and surrounding communities and Aboriginal peoples, information is expected to become increasingly more technical and detailed. Although the information being provided to communities and Canadians more generally must be comprehensive, it must also be concise and use plain language so the issues can be easily understood. Comments continue to highlight the importance of free, accessible and credible information on risk to communities to inform their decision-making. Importantly, it must truly reflect the level of risks so these are clearly understood. Misinformation must be identified and addressed.
- » **Ensure communities are willing:** Comments highlighted the importance of informed willingness in the host community and the need to sustain this willingness over the long period of construction and operation of the facility. Concern was raised about how willingness will be measured and assessed in the coming years at Step 5 of the site selection process. Concern was also expressed about whether this willingness can, in fact, be achieved.
- » **Appropriately and effectively involve:**
 - **Aboriginal peoples:** It was suggested there is a need for the NWMO to, over time, be clearer in how Aboriginal peoples will be involved, and specifically, how shared decision-making will be achieved on various key issues such as assessment of the suitability of potential sites and potential transportation routes.
 - **Surrounding communities:** Comments underlined the importance and challenge associated with involving communities in the area surrounding interested communities, and the challenge to demonstrate that benefits will outweigh the risks and any risk will be mitigated. The questions and concerns of surrounding communities must be successfully addressed, and benefits demonstrated.
 - **Youth:** The importance of involving youth continues to be highlighted, given the multi-generational nature of Adaptive Phased Management and the need to transfer knowledge from one generation to another. The importance of involving First Nations youth, in particular, was highlighted.
- » **Ensure full funding of the project:** Comments highlighted the importance of continuing to ensure that adequate funding exists for implementation of Canada's plan by the waste owners.

- » **Identify emergency management plans and procedures:** Comments raised the importance of identifying appropriate emergency plans and procedures to be examined for the transport of nuclear waste and also for the transfer of used nuclear fuel to the deep geological repository.
- » **Ensure understanding of the facility:** Comments highlighted the need to not only continue to build understanding of the *process* being used to implement Canada's plan, but also importantly, to continue to build understanding about the *end goal* of Adaptive Phased Management, which is the long-term containment and isolation of used nuclear fuel in a deep geological repository. This should continue to include information on what needs to be done, by when and by whom, all of which could be used to track progress.
- » **Continue to address long time frames:** Comments suggested that the long time frames associated with the implementation of the site selection process, Adaptive Phased Management and the long-term management of used nuclear fuel in general, pose a challenge in the near term to developing and sustaining relationships with potential host communities, surrounding communities and Aboriginal peoples. In the long term, comments reflected on the challenge of ensuring that the used nuclear fuel is effectively contained and isolated over the long time frames required.

Other areas of comment included:

- » **Nuclear power:** Several comments focused on the future of nuclear power and the context it provides for the NWMO's work. One comment suggested that the NWMO encourage discussion about the future of nuclear power and that "the attitude of the public to the task of NWMO might be quite different if it were known that nuclear power is on the way out." Another comment expressed the need for all nuclear power plants to be closed because they are too dangerous.
- » **Other management options:** The NWMO received a few comments suggesting that long-term storage and management of nuclear waste at the sites where nuclear waste is produced should be considered.

Dialogue Continues

The NWMO continues to receive comments and suggestions about its work programs and plans, even after the close of the official comment period for the 2012 to 2016 Plan. All comments are welcome as the NWMO continues to develop and adapt its plans.

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