

Chair and members of the Commission,
thank you for the opportunity to present our concerns and recommendations
on Bruce Power's project proposal.

My name is Siegfried Kleinau, this presentation is made on behalf of the
Bruce Peninsula Environment Group (BPEG), incorporated as a not-for-
profit corporation, founded by Lynda Hoita and myself 21 years ago. BPEG
has a membership of over 200 families and individuals living along the
shores of Georgian Bay and Lake Huron.

This active organization has been holding
monthly meetings in Lion's Head, 70 km north of Owen Sound, since its
inception.

I have reviewed CMDs 10-H19, 10-H19.1 and 10-H19.2.

The Steam Generators in BPs requested licence are from Bruce A units 1 &
2 and originate from Ontario Power Generation's (Ontario Hydro) power
production from 1972 to 1997.

Bruce Power never brought them into service.

This clearly constitutes that these SGs are historical radioactive waste and
are owned by OPG. Bruce Power has only detached them from those units,
transported them to OPG's Western Waste Management Facility (WWMF)
and there OPG has taken possession of its own waste components.

Bruce Power has no jurisdiction over the further disposition of these SGs!
Therefore the Commission should reject BP's application due to a matter of
ownership and jurisdiction.

Should the Commission continue to deal with BPs request, we contend that
there is no evidence of lessening the environmental footprint by this
proposed project. The shipment is classified as Surface Contaminated
Objects (SCO-1), having radioactive material distributed on those surfaces
(10H-19, 4.1.2) No matter how staff twists and turns in describing this
classification, radioactive emissions will be present during transportation,
loading and shipping, spreading dangerous effects along the whole land and
sea route. And in Sweden the radioactive contamination will be even more
pronounced with the scrapping and melting operations. Selling the so-called
decontaminated scrap into the open market for consumer goods is the height
of unethical behaviour!

It is all about maximizing profit, which was well amplified by BPs CEO on
their web site.

We are curious why BP wants to ship those huge radioactive crates 90 km
north to the Port of Owen Sound on Georgian Bay, making the shipping
route much longer and treacherous, instead of choosing the deep water
commercial Port of Goderich on Lake Huron, only a 60 km drive straight

south down HWY. 21. Must have something to do with their friendly constituency in Bruce and Grey Counties.

Further to staff's conclusion "that the environmental and human health risks from a release due to a credible accident would be very low" we refer to the prominently displayed logo on the front page of CNSC's web site. There we read: "WE WILL NEVER COMPROMISE SAFETY".

BP has contracted Studsvik from Sweden to oversee the proposed project from the point of leaving the Bruce site. Studsvik's submission 10-H19.2 describes only their waste processing procedures and in no way refers to the handling of this project. Studsvik engages 4 third party contractors – has CNSC staff even bothered to look into their backgrounds, their safety record?? WMG doesn't even disclose what the 3-letter acronym stands for on their website ! WE WILL NEVER COMPROMISE SAFETY!!??

Staff keeps working with BPs calculation of Dose Rate Estimates, comparing them to CNSC's Regulatory Limits of 1 mSv to the public, stating that people driving or walking by the SGs in transit would receive less than 1 % of that limit.

Numerous recent studies have found that low doses like that can have detrimental effects on peoples' health, yes, it needs special mention that those regulated limits are based on the model of a 154 pound Caucasian male 20-30 years old and 1,70m tall. No consideration is given to the different body characteristics of women, the rapid development of children and of fetuses. The BEIR VII report (2006) of the National Academy of Sciences shows a substantial cancer incidence risk for women from radiation exposure compared to men.

The Bruce-Grey Medical Officer of Health in her comments assuring the safety of BPs project is quoted as comparing any exposure to the public to a chest X-ray, mentioning gamma and beta radiation. She does not seem too much informed about the effects of breathing in alpha particles. In this context we are questioning the ability of the Owen Sound Hospital of dealing with large numbers of radiation victims. This accreditation must be part of any Emergency Response Plan and so must be the certification of training of all first responders! WE WILL NEVER COMPROMISE SAFETY!!??

Contracting a vessel flying the flag of the Antigua and Barbuda West Indies Shipping Company would raise suspicions regarding training and security of the crew handling radioactive cargo. To ferry a dangerous load through the channels and locks of the Great Lakes and the Seaway a rigid evaluation must be performed by CNSC staff. Pilots have to be taken on board, are they protected?

Maritime disasters are more common than widely known. Collision scenarios and fires on ships like the one travelling the Welland Canal have not been included in the accident lists. **WE WILL NEVER COMPROMISE SAFETY!!??**

There is barely a mention of the return shipment of highly concentrated radioactive waste, which apparently would be covered by the requested licence. How is the transport being evaluated? This must be public knowledge and discussion! We will never compromise safety!!??

The Environmental Assessment conducted and approved by the CNSC under CEAR Ref.# 04-01-8081 clearly laid down the handling and storage activities regarding the Steam Generators.

If the Commission decides to keep deliberating Bruce Power's request this must be classified as a new project, subject to an Environmental Assessment, despite staff's denial, and, because of the myriad risks involved in this scheme the Precautionary Principle must be applied as constituted under the Canadian Environmental Protection Act (CEPA 1999), and needs to be referred to the Minister of Environment for an Independent Panel review EA.

We urge the Commission to seriously consider our concerns and accept our recommendations in light of fairness and transparency to validate this Regulator's commitment **NOT TO COMPROMISE SAFETY!!**

Thank you for your time, we will attempt to answer your questions.

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