

The Secretariat,
c/o Ms. Louise Levert,
CNSC
Ottawa, ON
K1P 5S9

September 22, 2010

Supplementary to BPEG's submission on Bruce Power's Steam generator shipment licence request, listed as CMD10-H19.9 on the public hearing agenda.

Further to the submission by the Bruce Peninsula Environment Group Inc (BPEG) we would like to enter a supplementary part.

The Environmental Assessment (EA) conducted on the refurbishment of Bruce Power's Units 1-4 for Life Extension and Continued Operation as indexed at CEAR Ref.# 04-01-8081

clearly laid down the activities regarding this project.

The CNSC accepted the findings which also included the determined storage of the decommissioned steam generators of all units at OPG's Western Waste Management Facility (WWMF).

Bruce Power's proposal to remove the 16 steam generators from OPG's storage building, which has enough space for another 8 units, contradicts the determination of the approved EA and calls for a completely new assessment to accommodate public input and scrutiny. There is no basis for staff's contention that an Environmental Assessment is not required as it does not meet the definition as of a project in the Act (4.3.1). If refurbishment was a project subject to an EA, then this completely new way of dealing with decommissioned waste under international laws must be classified as a Project!

WE are calling on the Chair and the Members of the Commission to adopt the finding that this new and unprecedented proposal is a Project to be assessed via a Comprehensive Environmental Assessment to ensure close scrutiny by independent experts and public stakeholders.

Thank you for accepting our supplementary and giving it serious consideration in light of fairness and transparency.

Respectfully submitted,
Siegfried (Ziggy) Kleinau,
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