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April 24, 2008

Mr. Ken Nash
President
Nuclear Waste Management Organization
22 St. Clair Avenue East 6th Floor
Toronto, Ontario
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Dear Mr. Nash,

Thank you for your letter of April 14th dealing with Adaptive Phased Management of Canada's used nuclear fuel (UNF).

I have looked at the seven strategic objectives set out on page 10 of the Draft Plan. Several are of such a nature that they would be unlikely to be opposed by anyone.

The long term project is to choose and develop a site (SDS) for the storage and/or deposit of UNF. A number of questions arise. Some of them are:

1. Are there a number of potential SDS locations in Canada that meet the technical criteria required?
2. What are the community/political objections to each SDS?
3. Are there problems of transporting existing and future UNF to the site chosen and are they serious enough to affect the choice of SDS.
4. Given that the SDS will need to be monitored for a long period of time should it be designed as a disposal site only or as a storage site from which UNF could be retrieved for reprocessing should this prove itself to be an attractive option in the future, and does this issue affect site selection?
5. How is all this to be paid for now and into the future? You propose to address this issue in your objectives.

We have the advantage that Canadians are not the first ones in the field. There is international experience with respect to funding, transport and other issues.

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It strikes me that your task is set out in objectives 1 – 7.

There are technical problems. Unless perfection is required of all possible proposals I do not think those problems are insurmountable.

The substantial problem is to secure public acceptance of the SDS choice. I am not convinced that you (or anyone else) can design a collaborative process for site selection that will materially assist in solving this problem. It may be that with the passage of 5, 10 or 20 years the public will come to accept nuclear fuelled electric power (nuclear power) as clearly necessary and therefore that nuclear power and the disposal (or storage) of UNF must be accommodated. On the other hand this is a long period to wait to put off making any decision and to expose the process to some unpredictable event e.g. a nuclear power accident in (say) France or Japan that would heighten public concern.

My own inclination would be to be more aggressive in site selection. I think I would identify 6 or 8 SDS locations and devise rough plans for each site and start building long term relationships with interested Canadians including Aboriginal people (incidentally I would select wording that did not suggest that Aboriginal people were not included in the description of “interested Canadians”).

My experience is that you cannot talk with local people and other interested people about a project unless you have a rough plan which allows you to answer the more obvious questions that will be raised.

Armed with advice from your technical people that location A or B or C can be made to work and a rough plan of what would be constructed at such location and what would happen there on an ongoing basis, the NWMO could then engage people in a few locations to gauge their reaction to the project.

Clearly this is to court a negative reaction. It seems to me that location of the SDS is the major issue. The technical issues, while important, are solvable and that the reaction of the public is the primary issue. Maybe someone can devise a collaborative design of a process for site selection over a period of years without confronting the issue in a public way but I doubt it.

Broadly speaking, the chief concern in the public mind about nuclear power is what to do with the UNF. I believe that this will not go away. Nuclear reactor safety is receding as a public

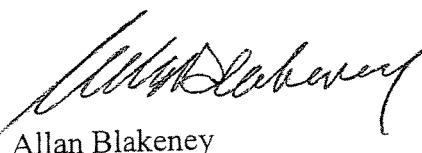
issue as the decades pass without incident. UNF issues remain as the volume of UNF grows and as secondary concerns about UNF seemingly increase.

As we move into a world of random terrorism, delaying any public controversy about SDS locations may be wise. In pure political terms putting off making a decision on a thorny issue is always attractive. But I'm not at all sure that time will work to the advantage of the industry and the appropriate use of nuclear power.

Perhaps you feel you are committed to what might be called the "marking time" strategy until public opinion jells, because of the more or less official adoption of the adaptive phase management approach. If you feel it is open to you I would urge you to consider a strategy of tentatively identifying several locations, roughing out a plan for each and beginning to gather in statements of support and statements of concern from stakeholders in the several locations. If too much concern emerges all could be invited to become actors in the collaborative design process as it emerges.

I pass along these thoughts for what they may be worth in response to your invitation to do so.

Sincerely,



Allan Blakeney