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April 15, 2016

CD#: 00216-CORR-00521-00004

**MR. RON HALLMAN**

President  
Canadian Environmental Assessment Agency  
Place Bell Canada  
160 Elgin Street, 22nd Floor  
Ottawa, Ontario K1A 0H3

Dear Mr. Hallman,

**OPG's Deep Geologic Repository for Low and Intermediate Level Radioactive Waste Project – Further Studies to Support Environmental Assessment Decision**

Reference: 1. Minister of Environment and Climate Change letter, Honourable Catherine McKenna to L. Swami, "Deep Geologic Repository for Low and Intermediate Level Radioactive Waste Project," February 18, 2016, CD# 00216-CORR-00521-00003.

This letter is to inform the Canadian Environmental Assessment Agency (CEAA) of Ontario Power Generation's (OPG's) response plan and when OPG will be submitting the information requested in a recent letter from the Minister of the Environment and Climate Change [Reference 1]. Further, this letter seeks confirmation that OPG's response plan will meet the objectives set out in the Minister's request.

OPG will provide the additional information requested by year-end, 2016.

The following provides OPG's understanding and response plan for each of the three elements of the request:

1. Alternate Locations

OPG has interpreted this request as follows: OPG will assess the environmental effects of two technically and economically feasible geologic regions in Ontario for a new low and intermediate level waste (L&ILW) disposal facility. One assessment will consider a deep geologic repository located in a sedimentary rock formation located in southern Ontario. The second will consider a deep geologic repository located in a granite rock formation located in central to northern Ontario. This study will describe what is meant by technical and



economic feasibility and document how those criteria were applied. It will also examine the incremental environmental effects, including impacts on greenhouse gas emissions and costs of acquiring lands and establishing these facilities in the two geologic regions in Ontario. As well, the assessment will examine the incremental costs and risks for repackaging and off-site transportation of the nuclear waste, this will include an assessment of conventional and radiological safety.

2. Cumulative Effects Analysis

The Nuclear Waste Management Organization (NWMO) is leading a multi-year site selection process for a used fuel repository and is currently studying potential areas across Ontario. As such, there is no specific plan for a used fuel repository in southern Ontario at this time. However, for the purpose of responding to this request, OPG will assess the cumulative effects of a hypothetical used fuel repository on the L&ILW DGR, within the boundaries of the DGR study area for those communities that are active in the NWMO siting process and which lie within the Saugeen Ojibway Nations (SON) traditional territory (i.e. Huron-Kinloss and South Bruce). The cumulative effects assessment will be based on the same identified residual effects for the L&ILW DGR as described in the 2011 Environmental Impact Statement (EIS).

OPG will continue to collaborate with the SON under existing OPG-SON protocols to determine how best to consider any potential cumulative effects within their traditional territory.

3. Mitigation Commitments

OPG will undertake a review of its mitigation commitments and mitigating actions for each identified adverse effect under CEAA 2012. Commitments that were previously brought forward to the Panel will be identified as well as any new ones identified in the responses to this information request.

OPG seeks CEAA confirmation of OPG's understanding and response plan to address the Minister's request. Further, OPG requests clarity regarding the post submission review and acceptance process.

Sincerely,

<original signed by>

Laurie Swami  
Senior Vice President  
Decommissioning and Nuclear Waste Management

cc: Dr. Michael Binder - President, Canadian Nuclear Safety Commission  
R. Jammal - CNSC (Ottawa)  
D. Newland - CNSC (Ottawa)