



**Transport  
Canada**

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Safety and Security

Sécurité et sûreté

Transportation of Dangerous  
Goods Directorate

Direction générale du transport des  
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Our File : RDIMS # 12729118,  
7075-14-89 U

March 9, 2017

Robyn-Lynne Virtue  
Project Manager – Deep Geologic Repository Project  
Canadian Environmental Assessment Agency  
160 Elgin Street, 22nd Floor  
Ottawa, ON K1A 0H3

**Subject: Transport Canada's Technical Review of Ontario Power Generation's  
Supplemental Information for the Deep Geologic Repository Project**

Dear Ms. Virtue,

Thank you for your letter of January 18, 2017, in which you requested that Transport Canada review the supplemental information prepared by Ontario Power Generation (OPG) for its proposed Deep Geologic Repository Project. I am pleased to provide the following information for your consideration.

Transport Canada has a role in regulating the transportation of dangerous goods by rail and road. Dangerous goods must be handled, offered for transport, and transported in accordance with the *Transportation of Dangerous Goods Act* (TDG Act) and its supporting regulations and safety standards. These, in turn, are supported by a variety of international protocols and standards. Some elements of this regulatory framework with particular relevance to this project include, but are not limited to, the following:

- Part 7 of the TDG Regulations requires that persons offering certain dangerous goods for transport have an Emergency Response Assistance Plan approved by Transport Canada. The TDG Regulations also require them to have a valid TDG training certificate, to duly complete the appropriate documentation, and to select the proper means of containment. Proper notification of any 'reportable releases' is also a requirement under the TDG Regulations.
- The TDG Regulations (<http://www.tc.gc.ca/eng/tdg/clear-tofc-211.htm>) reference the *Packaging and Transport of Nuclear Substances Regulations* (PTNS Regulations) in sections 2.37 (substances defined as Class 7, Radioactive Materials in the PTNS Regulations are included in Class 7, Radioactive Materials) and 5.17. The PTNS Regulations are under the authority of the Canadian Nuclear Safety Commission (CNSC).

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- Section 5.17 of the TDG Regulations titled “Means of Containment for Class 7, Radioactive Materials” states:

*A person must not handle, offer for transport or transport dangerous goods included in Class 7, Radioactive Materials, in a means of containment unless the means of containment is in compliance with the “Packaging and Transport of Nuclear Substances Regulations”.*

- The PTNS Regulations ([http://www.pub.iaea.org/MTCD/Publications/PDF/Pub1570\\_web.pdf](http://www.pub.iaea.org/MTCD/Publications/PDF/Pub1570_web.pdf)) reference further requirements, as set out in the International Atomic Energy Agency’s (IAEA) *Regulations for the Safe Transport of Radioactive Material*.


In the administration of TDG requirements, Transport Canada works with departments and agencies such as the CNSC, Natural Resources Canada’s Explosives Safety and Security Branch, and Health Canada. These groups provide specialized advice on their respective regulations, and also participate in compliance inspections and accident response activities within their own areas of responsibility.

The transportation of radioactive materials is a highly regulated activity, backed by strict inspections and enforcement. The containers used to transport these materials are extremely robust, and the rules for its handling throughout transit must meet international standards. As a result, the transportation of radioactive materials has an excellent safety track record in Canada.

After reviewing the supplemental information provided by OPG, Transport Canada has determined that if the transportation of low and intermediate level radioactive waste is conducted in accordance with all applicable regulatory requirements, there would be no significant incremental risk associated with the offsite transportation scenarios considered in the report.

I trust the information above addresses your questions. Transport Canada is committed to fully supporting your review of this proposal, and we will be pleased to provide additional information throughout the process as needed.

Regards,

  
<Original signed by>

Benoît Turcotte  
Executive Director  
Regulatory Frameworks and International Engagement  
Regulatory Affairs Branch