

Comments on Post -Decommissioning

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NRCan gives 4 phases of Decommissioning. The last phase ends in "release of the facility, location or site from regulatory control, or if unrestricted release cannot be achieved, institutional controls are required to be in place."

This in effect is abandonment.

Because of the very long-lasting threat posed by many of these radionuclides, there needs to be on-going attention to the decommissioned site and surrounding area that continues into the very, very, very long-term.

Why:

- Standards used to determine that the site could be decommissioned may not have been seen as strict enough by the community.
- Standards that were considered acceptable by the regulator may be strengthened in the future as our scientific understanding deepens. To protect the community, these new standards should be applied instead of just writing off the community.
- Decommissioning process may have made errors in terms of discovering issues and/or in terms of taking adequate clean-up actions.
- Gives assurance to community that the site and their community hasn't been abandoned
- Keeps community aware that this is a site different from other locations in the community and, therefore, it needs special attention.

Actions needed post-decommissioning:

- Regular monitoring of environment:
 - Both on-site and off-site
 - Checking levels of contaminants in all media (e.g., water, sediments, soil, ground and surface water, air.)
 - Checking levels of contaminants in all forms of life and the quality of their health
 - Checking impacts on harvesting areas for indigenous and other communities
- Protocols and frequency of monitoring should be developed by the government jointly with the community.
- Make all monitoring data easily available to the public.
- After each round of monitoring, a community meeting should be held to discuss findings and to hear from the public about their concerns.
- If monitoring shows potential problems, any further remediation actions that need to be taken should be decided on jointly by the government and the community. A clear timeline should be set for carrying out any remedial actions decided on.
- The public should be provided with sufficient resources to be able to hire technical experts to help the community play their roles in the actions needed post-decommissioning, including determining monitoring needs, evaluation of monitoring

results, and need for and design of additional remediation actions that may be needed. The community should choose which experts they want to hire and the terms of reference for their work.

Who's Responsible?:

- original plant owner should be financially responsible for the monitoring and further remediation after decommissioning, e.g., not the aboriginal community, or conservation organization, or municipality or developer that the power plant owner sold or “gave” the land to
- government and community – not the original plant owner – should decide on monitoring protocols and further actions needed and determine who is to conduct the monitoring and remediation.
- Problem: how fund actions if the nuclear power plant owner disappears? Have a nuclear industry funded reserve fund? Other options?

These post-decommissioning activities should continue for ever.