

The Nuclear Free Great Lakes Campaign consists of eight safe-energy organizations from the United States and Canada dedicated to the cessation of radioactive contamination of the Great Lakes, and the removal of nuclear power from the Great Lakes Basin. We appreciate the opportunity to make the following remarks to the International Joint Commission (IJC) in support of its enlightened policy calling for "zero-discharge" of persistent toxins into the Basin, which include bioactive and bioaccumulative radionuclides.

The Nuclear Free Great Lakes Campaign endorses the advisories and recommendations of the IJC in its 8th and 9th Annual Report on the treatment of radionuclides. Recent alarming developments in both Canada and the U.S. concerning reactor operation, radioactive waste transport and temporary storage, and intended use of experimental "mixed-oxide" — or MOx — fuels seriously threaten these worthwhile aspirations.

The Campaign wishes to express its wholehearted support for the IJC recommendations for "zero discharge" of radioactive substances into the Great Lakes, and makes the following recommendations to the Commission, and to the governments of the United States and Canada:

- that the governments of Canada and the United States enact the laws and policies necessary to achieve the IJC recommendations; and further, instruct the regulatory agencies responsible for regulating the nuclear industries of these countries to develop and begin implementing within three years the regulations and policies necessary to achieve this goal;
- that the Congressional delegations in the states bordering the five Great Lakes convene a Congressional hearing open to the public to demand full accounting from the U.S. Nuclear Regulatory Commission on its previous unilateral rejection of the IJC recommendation;
- that the introduction of MOx fuel transport and use is a policy that runs counter to the recommendations of the IJC, and as such, both governments should immediately halt all plans for use and transport in, into, or through the Great Lakes Basin;
- that, given the hostility towards the IJC recommendations on radionuclides on the part of the U.S. Nuclear Regulatory Commission and its Canadian counterpart, and their apparent unwillingness to enforce their own regulations in an objective and consistent manner, these agencies can no longer be trusted as agents to protect the public health, safety and welfare; and, as a consequence of this abdication of their regulatory responsibility to society, the governments of the United States and Canada shall provide funding for independent citizen monitoring efforts, funds for which shall be provided by assessing the polluting nuclear industries in a manner such that the costs shall not be borne by ratepayers or taxpayers;
- that, again given the inadequate, arbitrary and inconsistent regulatory response to such issues as: Y2K grid readiness and reactor safety;

allowing reactors to operate while in states of non-compliance and in violation of design basis; effects and impacts of utility de-regulation on reactor safety and maintenance; and use of faulty dry-cask designs for temporary storage of "high-level" wastes in the form of irradiated fuel;

to safeguard and achieve the IJC's stated aims of "zero discharge" of radionuclides, the Campaign:

1.) petitions the IJC to call for an emergency re-evaluation of the primary and secondary safety systems at each and all nuclear reactors in the Great Lakes Basin;

2.) petitions the IJC to call on the governments and regulatory agencies of the United States and Canada to halt the further use of dry-casks for temporary storage of irradiated fuel until such time as the regulator agencies themselves from both countries:

- have complied fully with their own existing regulations on cask design, certification, construction, and operation;
- have ordered the cask manufacturers and utility users to meet the same level of 100% compliance with existing regulations;
- require independent pre-certification testing of all cask designs;
- require each cask design demonstrate a proven unloading method for faulty casks;
- require site specific public hearings for potential Independent Spent Fuel Storage Installations

3.) petitions the IJC to call on the government and Nuclear Regulatory Commission of the United States to cease all plans to ship irradiated fuel assemblies in, into, or through the Great Lakes Basin until such time as a fully operational permanent, deep-geologic repository exists for the perpetual storage of the fuel assemblies.

The Campaign stands ready to support the IJC in achieving its stated goals of "zero discharge" of harmful radionuclides in the Basin, and is available to answer any questions members of the Commission may have about these recommendations and positions.

We thank you for your efforts on this issue, and are grateful for your consideration of our viewpoints.

Note: NEIS helped develop these positions with other member organizations of the Nuclear Free Great Lakes Campaign as part of the planning that emerged from the NFGL Action Camp of August, 1999. NEIS members delivered this position paper to the IJC at its Annual Meeting in Milwaukee, WI, in September, 1999