

# Peer Review Report

**Emergency Services Study Report (S17)** 

Municipality of South Bruce

November 02, 2022

# **Executive Summary**

The Nuclear Waste Management Organization (NWMO) has been engaged in a multiyear, community driven process to identify a site where Canada's used nuclear fuel can be safely contained. The site selection process involves nine steps, with the process currently at Step 3 (Phase 2). The NWMO is now in its final screening process, and the two remaining siting areas currently being assessed under Step 3, Phase 2, are the Municipality of South Bruce (MSB) and the Township of Ignace, and their surrounding areas. The NWMO plans to complete all preliminary assessment work and to select one community/area to host the Adaptive Phased Management (APM) Project (Project) by 2024.

Building on previous work, engagement completed to-date, and MSB's 36 Guiding Principles, NWMO and MSB are working together to prepare a suite of studies which will be shared broadly with the community. The studies are being undertaken by NWMO or MSB, with some being joint efforts. The MSB has retained consultants (Deloitte LLP, Tract Consulting) to develop a number of studies and to peer review others (GHD Limited [GHD] team) developed by NWMO and their consultants (DPRA Canada [DPRA] team). The information acquired through the studies is expected to aid MSB make informed decisions about whether the Project is suitable for their community, and if they are willing to consider hosting it and under what circumstances and terms.

The Emergency Services Study Report (S17) is one of the studies being carried out by NWMO. The overall objective of the Emergency Services Study is to assess the effects of the Project on emergency services locally and regionally (Bruce County) during the construction and the operations periods. The Study was peer reviewed by Subject Matter Experts (SMEs) from GHD (Mark Jasper) and the Radiation Safety Institute of Canada (RSIC; Laura Boksman) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt), making up (the Peer Review Team [PRT]). This peer review has been undertaken on the framing and scope of the study, and the effects assessment, in accordance with the Peer Review Protocol process established jointly by MSB and NWMO. The PRT considered several documents and information in the peer review of the Emergency Services Study Draft Report to aid in their understanding, focus the peer review, and develop their findings. The PRT findings and resolution of those findings are outlined in this Peer Review Report.

The PRT provided comments on draft versions of the Emergency Services Study Report, and these were subsequently discussed in greater depth with the Study authors. The outcome of the discussion provided greater clarity and helped to focus the objective of the Study. The Study incorporated insights gathered through seven knowledge holder interviews/consultations and brought forward relevant data from various emergency services (local, provincial, and federal), NWMO documentation, and relevant data and information sources. In addition, where appropriate, the Study incorporated the findings from other community studies that helped to better inform the potential impacts of the Project on emergency service requirements.

At this stage, there is insufficient information to provide details on the Project's effects on the local emergency service requirements. For example, conclusions as to resource requirements cannot be made with the currently available data. However, the Study identified areas of concern and that future studies are required to fully understand the impact on the community. The Study early demonstration of the relevant MSB's Guiding Principles (specifically principles #10, #28 and #32) could be addressed should the Project proceed.

It is the view of the PRT that the Emergency Services Study Report satisfies the objective of an initial assessment of the effects of the Project on emergency services locally and regionally (Bruce County) during construction and operations. Should MSB be selected as the host community it is recommended that NWMO execute further studies to determine the emergency response provisions that will be required in the MSB, and to work with emergency service providers to ensure that there is capacity to provide response to emergencies to meet projected growth and new hazards requiring an update to the response capabilities. The Study has identified potential options for the NWMO to pursue, should MSB be selected as the host community.

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### **Acronyms**

APM Adaptive Phased Management

CNSC Canadian Nuclear Safety Commission

CSR Corporate Social Responsibility

CWB Community well-being DPRA Canada Inc.

GHD GHD Limited

IEC Independent Environmental Consultants

MSB Municipality of South Bruce

NWMO Nuclear Waste Management Organization

PRT Peer Review Team

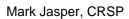
RSIC Radiation Safety Institute of Canada

SME Subject Matter Expert

## **Scope and limitations**

GHD and RSIC have prepared this Report exclusively for the Municipality of South Bruce. All data and information contained herein is considered confidential and proprietary and may not be reproduced, published or distributed to, or for, any third party without the express prior written consent of GHD and RSIC.

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#### 1. Introduction

This report documents the peer review undertaken of the Emergency Services Study (S17) prepared by DPRA Canada Inc. (DPRA) and Independent Environmental Consultants (IEC) dated March 17, 2022 (Draft Report, V1), September 27, 2022 (Revised Draft Report, V2), and October 28, 2022 (Final Report, V3). The Nuclear Waste Management Organization (NWMO) has been engaged in a multiyear, community driven process to identify a site where Canada's used nuclear fuel can be safely contained. The site selection process involves nine steps, with the process currently at Step 3 (Phase 2). Step 3 is defined by two phases of preliminary assessments for each interested community. Phase 1 involved primarily desktop studies documenting the current socioeconomic conditions in the communities and then considering what might be the possible implications of the Adaptive Phased Management (APM) Project (Project) on community wellbeing (CWB) for each community and the wider area. For interested communities that successfully completed the initial screening in Phase 1, Phase 2 (the current phase) involves additional work to support conducting a preliminary assessment of potential suitability and narrowing the number of communities that have expressed an interest in partnering with NWMO.

The NWMO is now in its final screening process, and the two remaining siting areas currently being assessed under Step 3, Phase 2, are the Municipality of South Bruce (MSB) and the Township of Ignace, and their surrounding areas. The NWMO plans to complete all preliminary assessment work and to select one community/area to host the APM Project by 2024 which then marks the beginning of the fourth step of APM implementation<sup>1</sup>. The selection of a final site will trigger the regulatory approvals phase of the APM Project. Federal approval under the Impact Assessment Act and licensing by the Canadian Nuclear Safety Commission (CNSC) under the Nuclear Safety and Control Act will be required. Meeting federal regulatory standards is imperative to achieve approval, and to withstand intense public and regulatory scrutiny.

Building on previous work, engagement completed to-date, and MSB's 36 Guiding Principles, NWMO and MSB are working together to prepare a suite of studies which will be shared broadly with the community. The list of studies is included in **Appendix A** grouped by similar topic area (MSB led, environment, infrastructure, and socio-economic). The studies are being undertaken by NWMO or MSB, with some being joint efforts. The MSB has retained consultants (Deloitte LLP, Tract Consulting) to develop a number of studies and to peer review others (GHD Limited [GHD] team) developed by NWMO and their consultants (DPRA). The information acquired through the studies is expected to aid MSB make informed decisions about whether the APM Project is suitable for their community, and if they are willing to consider hosting it and under what circumstances and terms.

The Emergency Services Study is one of the socio-economic studies being carried out by NWMO. The overall objective of the Emergency Services Study is to assess the effects of the Project on emergency services locally and regionally (Bruce County) in the construction and the operations periods. The Emergency Services Study was peer reviewed by Subject Matter Experts (SMEs) from GHD (Mark Jasper) and the Radiation Safety Institute of Canada (RSIC; Laura Boksman) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt), making up the Peer Review Team (PRT). The peer review has been undertaken on the framing and scope of the study, and the effects assessment, in accordance with the Peer Review Protocol process established jointly by MSB and NWMO.

Section 2 elaborates on the Peer Review Protocol process followed including the steps specifically followed and discussions held with NMWO and the DPRA team.

As described in Section 3, the PRT considered several documents and information in the peer review of the Vulnerable Populations and Social Programs Studies to aid in their understanding, focus the peer review, and develop their findings.

The results and resolution of the PRT findings are outlined in **Section 4** starting with how the Revised Draft Report has been revised to address the comments on the Draft Report. This is followed by a review of how the Study

<sup>1.</sup> Nuclear Waste Management Organization, 2020. Moving Towards Partnership - Triennial Report 2017 to 2019.

complies with the approved Work Plan and how the Study informs the applicable Guiding Principles. Lastly, the conclusions from the peer review are provided.

The Emergency Services Study is a first step in starting to understand key considerations and future needs that would be required if the Project is located in MSB. As they currently exist, the various emergency service providers supporting the municipality do not have sufficient knowledge/training, equipment, resources, or capacity to support the Project. Further studies and planning by the NWMO will be required to identify the emergency service requirements to be provided by the NWMO and those that require support from industry and municipal partners. The Study provides various options for the NWMO to pursue, to identify the response capability and capacity needed by municipal partners, and the steps needed to work with such partners to implement and fund changes that would be required to support the Project.

#### Peer Review Protocol 2.

#### **Objectives and Overview of the Peer Review Protocol** 2.1 **Process**

As mentioned, the peer review of the Emergency Services Study was undertaken in accordance with the Peer Review Protocol established jointly by the MSB and the NWMO. The Peer Review Protocol had the following established objectives:

- 1. To provide the community of the MSB with an independent review by qualified SMEs
- To complete a peer review of NWMO's assessment of potential impacts and proposed benefits of locating the APM Project in MSB in comparison to existing conditions
- To review how the potential impacts and proposed benefits adhere to the 36 principles that will guide the MSB's assessment of willingness to host the APM Project

With these objectives in mind, the Peer Review was conducted in a collaborative manner between the NWMO/DPRA team and the MSB/GHD team while maintaining independence during the process. Appendix B includes the Peer Review Protocol established in June 2021 and Figure 2.1 summarizes the process followed.

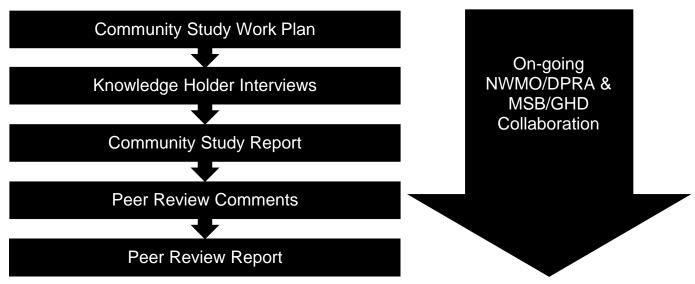


Figure 2.1 The Peer Review Protocol Process

With Figure 2.1 in mind, the following identifies the primary activities carried out by the PRT:

#### Community Study Work Plan

- Review the Statement of Work associated with the Community Study (CS) prepared by MSB (May 2021) to better understand the stated objectives
- Gain a greater understanding of the APM Project and area conditions including reviewing and providing comments on NWMO's Project design reports and considering responses received from NWMO
- Hold on-going discussions as required with the NWMO/DPRA team providing input where appropriate (e.g., data sources to be reviewed, study area boundaries, knowledge holders to be interviewed, etc.)
- Review and provide comments on the draft Work Plan associated with the CS prepared by the NWMO/DPRA team and consider responses received from the NWMO/DPRA team as part of them finalizing the Work Plan before its implementation

#### Knowledge Holder Interviews

- Attend Knowledge Holder interviews organized by NWMO to listen firsthand, ask questions, and seek clarifications. Review and provide comments on draft meeting minutes prepared by NWMO.
- Hold on-going discussions as required with the GHD Leadership Team (e.g., receive Project updates and information, ask questions, seek clarification, etc.)

#### Community Study Report

- Attend CS Draft Report Status Update Meetings organized by the NWMO/DPRA team
- Review the CS Draft Report (V1) prepared by the NWMO/DPRA team
- Review the CS Revised Draft Report (V2) prepared by the NWMO/DPRA team
- Review the CS Final Report (V3) prepared by the NWMO/DPRA team

#### Peer Review Comments

- Develop a preliminary list of comments including initial impressions, observations, and any potential issues and/or concerns with the CS Draft Report based on several documents and information as described in Section 3
- Attend a CS Draft Report Check-in Meeting with the GHD Leadership Team and MSB to discuss the preliminary list of comments and confirm those to be provided to the NWMO/DPRA team
- Provide the preliminary list of comments on the CS Draft Report to the NWMO/DPRA team for their understanding of the PRT's initial impressions, observations, and any potential issues and/or concerns
- Attend a CS Draft Report Working Session with the NWMO/DPRA team to discuss the preliminary list of comments and work through them collectively in a collaborative manner. Through the Working Session some comments were determined not to be applicable to the CS based on the clarifying discussions. In addition, through the Working Session it was agreed that those comments associated with the Draft Report's structure, or to such items like how sources or exhibits are referenced, or spelling and grammar, would be excluded and the focus would be more on content and substance as it related to the final Work Plan.
- In some situations, it was agreed to between the GHD Leadership Team/MSB and the NWMO/DPRA team that certain sections of the CS Draft Report or the entire document itself should be revised and resubmitted for review because of the nature and extent of the preliminary comments provided. In the situations of the entire document, the formal set of comments were held pending receipt of the revised CS Draft Report. Upon receipt, the revised CS Draft Report was reviewed, the preliminary comments updated accordingly for submission, and further discussions were held between the GHD Leadership Team/MSB and the NWMO/DPRA team prior to formal comments being submitted.
- Submit the formal set of comments on the CS Draft or revised Draft Report to the NWMO/DPRA team for their review and responses
- Review the responses from the NWMO/DPRA team to the formal set of comments and ensure there were no significant outstanding issues and/or concerns

#### Peer Review Report

- Prepare the draft Peer Review Report and submit to MSB for review
- Finalize the draft Peer Review Report based on any comments received and provide to MSB

#### Key Activities Associated with the Peer Review of the 2.2 **Emergency Services Study**

With the preceding process in mind, Table 2.1 lists the key activities associated with the Peer Review carried out by the PRT comprising the SMEs from GHD (Mark Jasper) and RSIC (Laura Boksman) in combination with the GHD Leadership Team (Greg Ferraro and Ian Dobrindt) for the Emergency Services Study prepared by DPRA and IEC. The Emergency Services Study was initiated by DPRA/IEC following finalization of the Work Plan in October 2021 and culminated in the Final Report being submitted to GHD on October 28, 2022.

Table 2.1 Key Activities Associated with the Peer Review of the Emergency Services Study

Key Activities	Date	Parties Involved
Review of the Draft Southwestern Ontario Emergency Services Study Work Plan (S17) issued by DPRA (August 10, 2021)	August 2021 – October 2021	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Issuance of the Peer Review Team comment disposition table on the Draft Work Plan	October 7, 2021	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Review of the Final Southwestern Ontario Emergency Services Study Work Plan (S17) issued by DPRA (October 7, 2021)	October 2021 – March 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Review of Emergency Services Study Report (S17) - Draft V1 – Southwestern Ontario Community Study issued by DPRA (March 17, 2022)	March 2022 – August 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Peer Review Team Check-in Meeting to review/confirm preliminary comments	March 29, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Issuance of the Peer Review Team preliminary comment disposition table on the Draft Report	March 30, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt)
Peer Review Team and DPRA/IEC Project Update Meeting to discuss/understand the preliminary comments	September 1, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt), RSIC (Laura Boksman), NWMO (Charlene Easton), DPRA (Vicki McCulloch), IEC (Donald Gorber and Mehran Monabbati), and MSB (Catherine Simpson)
Issuance of the Peer Review Team formal comment disposition table on the Draft Report	September 14, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt) and RSIC (Laura Boksman)
Issuance of DPRA/IEC Team responses to Peer Review Team's formal comments on the Draft Report	September 20, 2022	DPRA (Vicki McCulloch) and IEC (Donald Gorber and Mehran Monabbati)
Review of the Emergency Services Study Report (S17) – Revised Draft V2 – Southwestern Ontario Community Study issued by DPRA/IEC (September 27, 2022)	September 27 – October 28, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt) and RSIC (Laura Boksman)

Key Activities	Date	Parties Involved
Review of the Emergency Services Study Report (S17) – Final V3 – Southwestern Ontario Community Study issued by DPRA/IEC (October 28, 2022)	October 28 – November 1, 2022	GHD (Mark Jasper, Greg Ferraro, and Ian Dobrindt) and RSIC (Laura Boksman)

# **Key Documentation and Information** Reviewed

As stated, several documents and information were considered by the PRT in carrying out the Peer Review Protocol. Table 3.1 lists the key documents and information considered by the PRT in the review of the Emergency Services Study.

Table 3.1 Key Documents and Information Considered in the Peer Review of the Emergency Services Study

<b>Document Name/Information</b>	Author/Source/Date	Description/Application
Implementing Adaptive Phased Management 2021 to 2025	Nuclear Waste Management Organization (NWMO) (March 2021)	Reviewed to understand the Project planning timelines. The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
Vulnerable Populations and Social Programs Studies - Statements of Work	Municipality of South Bruce (MSB) (May 2021)	Reviewed to understand the objectives and scopes of work including inputs to the Vulnerable Populations and Social Programs Studies and their relationship to other Community Studies as envisioned by the MSB.
Knowledge Holder Interviews (South Bruce Fire Department; Bruce County Paramedic Services; Bruce Power; South Bruce Grey Health Centre; Compass Minerals; NWMO; Kinectrics Laundry Facility [Teeswater])	NWMO (July 2021 – October 2022)	Attended in-person to listen firsthand, ask questions, and seek clarifications as part of gaining an understanding of key knowledge holders' perspectives on the Project. Reviewed and provided comments on draft meeting minutes prepared by NWMO prior to their issuance to meeting attendees.
Deep Geological Repository Conceptual Design Report – Crystalline / Sedimentary Rock (APM-REP-00440-0211-R000)	NWMO (September 2021)	All members of the PRT reviewed the Executive Summary to obtain an understanding of the below ground facility. Subsequently, additional sections of the Report were reviewed, by certain members of the PRT as appropriate, to obtain a greater level of understanding specific to their areas of study (e.g., Facility Design and Operation, Aggregate Resources Study, Local Traffic Effects Study, Waste Management, etc.). The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).
Community Studies Planning Assumptions	NWMO (October 18, 2021)	Reviewed to understand certain parameters for the Project. The PRT provided comments (November 18, 2021) for NWMO's consideration and response (January 27, 2022).

Document Name/Information	Author/Source/Date	Description/Application
Southwestern Ontario Emergency Services Study Work Plan (S17)	DPRA Canada Inc. (October 7, 2021)	Reviewed to understand the purpose and outcome of the Emergency Services Study including its linkages to other Community Studies, scope and assumptions, approach, and key information sources/data collection.
Emergency Services Study Report (S17) - Draft V1 - Southwestern Ontario Community Study	DPRA Canada Inc. and IEC (March 17, 2022)	The draft output/deliverable from completing the final Work Plan for review by the PRT.
South Bruce and Area Growth Expectations Memo	metroeconomics (February 7, 2022)	Reviewed to understand the assessment of the potential for economic and demographic growth over the period from 2022 to 2046 of the Core Study Area including MSB both from the perspectives of growth independent of the Project as well as the result of the Project.
Emergency Services Study Report (S17) – Revised Draft V2 - Southwestern Ontario Community Study	DPRA Canada Inc. and IEC (September 27, 2022)	The revised draft output/deliverable from completing the final Work Plan for review by the PRT.
Emergency Services Study Report (S17) – Final V3 - Southwestern Ontario Community Study	DPRA Canada Inc. and IEC (October 28, 2022)	The final output/deliverable from completing the final Work Plan for review by the PRT.

#### **Peer Review Findings and Resolution** 4\_

#### Comments on the Emergency Services Study 4.1

The PRT provided formal comments to the NWMO/DPRA/IEC team on September 14, 2022 in the form of a memo and the accompanying comment disposition table (Appendix C). In reply, NWMO/DPRA/IEC provided a documented response on September 20, 2022 (September Response to Comments) describing how and where the formal comments will be addressed in the Revised Draft Report V2 (Appendix C, 4th column). Upon receiving the Revised Draft Report V2, the PRT reviewed it to ensure the documented responses were, in fact, incorporated into the Study (Appendix C, 5<sup>th</sup> column).

NWMO/DPRA/IEC issued the Final Report V3 on October 28, 2022. The PRT reviewed the updates made in the Final Report V3 and identified that a number of comments remain outstanding. Details on the outstanding PRT comments can be found in Appendix C.

From the review of the September Response to Comments and through the review of the Final Report V3, the PRT has further identified several areas of beneficial study that will allow the NWMO/DPRA/IEC to assess the potential Project's effects more fully on both local and regional emergency services. The suggested areas of further study and/or actions are summarized below. Pertinent findings from other community studies that address in whole or in part the recommended areas of study/action are provided to integrate the community study results and objectives, as appropriate.

#### Further study to determine and define the NWMO emergency service implementation requirements for the Project

The PRT suggest that NWMO needs to further develop their approach to manage emergencies during the construction and operations phases of the Project before the effects on the public emergency service providers can be appropriately determined. The emergency services that are currently identified in the Study for the Project include:

- Firefighting (structural/vehicular/industrial)
- Mine fire fighting
- Medical response and transport
- Mine rescue
- Radiological response
- Dangerous goods response
- Physical security

The Deep Geological Repository Conceptual Design Report – Crystalline / Sedimentary Rock (APM-REP-00440-0211-R000) referenced in the Study provides a high-level accounting of the proposed facilities that will be implemented to support emergency services at the Site including physical security, surveillance, subterranean safe refuge locations, and a fire department style building with fire apparatus. For each of these services, the PRT suggests that further study be carried out to detail what services and service levels will be provided by the NWMO which will allow for determining what services will need to be provided by the public emergency service providers (e.g., local fire department, local ambulance/hospital, local police, etc.) for the Project.

The additional study should identify the emergency services to be performed by NWMO, the corresponding skill acquisition level to be implemented and maintained, and the capacity of the service being provided. From this the service capability and capacity requirements for the public emergency service providers to support the Project can be determined.

#### Further assess industry best practices outside of the current Study spatial boundaries 2.

The PRT suggests that the spatial boundaries of the Study should only apply to determining the capabilities and capacity of local emergency services. As part of determining the emergency services that the NWMO will implement, and the services that will need to be implemented by the public service providers (as well as what interface the NWMO will need to have with the public service providers), the PRT suggests that further study be completed to identify industry best practices at both a national and international level. The study should consider many options to identify the best fit for the MSB, Bruce County, and the other supporting agencies in alignment with the established guiding principles and should not be limited by the available information confined to the spatial boundaries of the existing Study area. As an example, the PRT suggests that the future study and/or planning should further examine other established and well-defined projects with radiological hazards including the following:

- Chalk River
- Other Canadian nuclear power plants such as Darlington, Point Lepreau, etc.
- Other International nuclear and radiological facilities
- International underground repositories (some are in progress and may have more experience by the time further studies may be initiated)

#### Further study and determine the capability requirements for public emergency service providers to support the Project

Once it is determined what emergency services and service levels the NWMO will be providing to the Project, a supplemental study is suggested to determine the capability requirements the public emergency service providers will need to develop, implement, and maintain to support both the construction and operational phases of the Project. This capability study should also include a more detailed gap analysis of current capabilities for each public emergency service provider identified. The suggested capability study should define the needed skills and infrastructure types needed for each emergency service to support the project. A separate study is suggested to determine the needed capacity for that capability.

For example, consider an injured and radiologically contaminated worker who needs medical care. If the NWMO is not treating that person on-Site then that person will need to be transported to hospital and treated, using local responders. In this scenario, further study should examine, but not be limited to:

- a) Does the public emergency medical service (EMS) (local ambulance provider) have the skills, training, and applicable equipment needed to safely complete such a transport
- b) Does the hospital receiving the person have the skills, training, applicable facilities, and equipment needed to treat the contaminated worker.

When these can be qualified then the study should determine the needed capabilities and infrastructure that should be implemented for both local EMS and the receiving hospitals to safely provide these services.

This process should be completed for all emergency service operations that may be required to support the Project during the construction and operational phases and should leverage industry best practices (findings from Point #2) in alignment with the Guiding Principles established by MSB.

#### Study capacity requirements for public emergency service providers

When the capability requirements for each public service required to support the Project have been determined the capacity required for each new capability identified and any incremental capacity increases for the existing services currently being provided should be then determined.

This capacity study should consider the findings and future work related to the following studies completed for the Project:

- Housing Needs and Demand Analysis Study (E08)
- Workforce Development Study (E10)
- Community Health Programs and Health Infrastructure Study (S20)
- Infrastructure Baseline and Feasibility Study (I22)
- Local Traffic Effects Study (I23)
- South Bruce Growth Study

Information provided in these studies and future work plans will assist in determining the overall capacities needed to support the Project during the construction and operational phases. Additionally, the capacity should determine the funding instruments that will be needed to support the implementations for each of the public emergency service providers. Funding considerations should align with MSB Guiding Principle #28 (The NWMO will prepare a review of the existing emergency services in South Bruce and provide appropriate funding for any additional emergency services required to host the Project in South Bruce).

#### 4.2 **Comments on Adherence to the Work Plans**

The Emergency Services Study substantively complies with the approved Work Plan as indicated in Table 4.1. The PRT notes that the Emergency Services Study integrates their findings and recommendations of other related Community Studies including Community Studies Planning Assumptions, Labour Baseline Study, Workforce Development Study, Populations Projections Base Case and Anticipated Project Effects, School Age Population Projections, and the Housing Needs and Demand Analysis Study. Also, the PRT acknowledges that the Vulnerable Populations and Social Programs Studies describe the requirements for increased infrastructure and capacity building for School Boards within the Study Area.

Table 4.1 Adherence to the Work Plan

Step#	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
Step 1	Data Collection  —Secondary/ Primary; updated Project assumptions; information from other related community studies	a. Carry out a review of relevant emergency services reports and data sets (e.g., local and regional emergency response plans, service-specific emergency response plans, NWMO's emergency response plans)  b. Undertake interviews with key knowledge holders	a. Partially complete b. Completed, but the interviews conducted may be deficient due to missing information and insistencies. It is strongly recommended that these be addressed prior to finalizing the Study (supporting comments provide in the Disposition table)	See responses to PRT comments in Table 1 (Appendix C).	The addition of the language within the Revised Draft Report successfully addressed the review comment by indicating that NWMO will need to conduct additional studies during the pre-construction phase to identify and characterize potential Project emergencies (including underground emergencies) and develop additional detail regarding the specific circumstances that Project emergency services will be needed for:  - on-site/off-site construction and operations activities  - mine rescue (construction and operations phases)  - off-site transportation of UNF and on-site UNF handling (operations phase)

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
Step 2	Provide Inputs to and take Outputs from Other Studies	<ul> <li>a. Share data and findings with other community studies</li> <li>b. Take into considerations data and findings from other studies that are pertinent to the subject study</li> </ul>	a. Unknown and may be N/A b. Partially complete, key information not included in this Study	Agreed there is some cross- over/linkage with Land Use study only. The Land Use draft V1 (Mar 11) preceded Emergency Services draft V1 (March17), though there was sharing of information. This will be more fulsomely addressed in the revised V2 of ESS. In addition, the Local Traffic Study (Morrison Hershfield, July 2022) will be reviewed to see if there is information that can contribute to the revised report.	The Revised Draft Report included updated content from other relevant studies. Review comment was addressed successfully.
Step 3	Analysis and assessment, identification of effects management options	<ul> <li>a. Based on review of reports/data sets and knowledge holder interviews, describe the services currently offered: <ul> <li>Nuclear Emergency Response capability</li> <li>Fire response capability of MSB</li> <li>Paramedic, Ambulance, and Air Ambulance capability of Bruce County</li> <li>Hospital services in proximity to the potential nuclear site</li> </ul> </li> <li>b. Based on review of reports/data sets and knowledge holder interviews, describe: <ul> <li>The NWMO's proposed internal conventional emergency services including contractor performed emergency services during construction</li> </ul> </li> </ul>	<ul> <li>a. Partially complete (supporting comments provided in the Disposition table)</li> <li>b. Partially complete (supporting comments provided in the Disposition table)</li> <li>c. Partially complete (supporting comments provided in the Disposition table)</li> <li>d. Partially complete (supporting comments provided in the Disposition table)</li> <li>e. Not mentioned in the Study</li> </ul>	See responses to PRT comments in Table 1 (Appendix C).  With respect to 'e' "Based on the proposed Project emergency services options and the potential changes to nuclear emergency response, identify options for proposed long-term monitoring programs required": This is more appropriately done as part of future studies, if the Project is located in the South Bruce Area.	The additional text in the Revised Draft Report successfully addressed the review comment by indicating that NWMO will need to conduct additional studies during the pre-construction phase to identify and characterize potential Project emergencies (including underground emergencies) and develop additional detail regarding the specific circumstances that Project emergency services will be needed for:  - on-site/off-site construction and operations activities  - mine rescue (construction and operations phases)  - off-site transportation of UNF and on-site UNF handling (operations phase)

Step #	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
		The NWMO mine safety and rescue emergency services and other collaborating parties  Based on the analyzed findings, identify and describe options for emergency services during the construction and operations phases (e.g., mutual aid arrangements)			
		d. Based on the analyzed findings and the options identified in Step 3c. above, describe the potential changes to the nuclear emergency response capability that may occur during the operations period			
		e. Based on the proposed Project emergency services options and the potential changes to nuclear emergency response, identify options for proposed long- term monitoring programs required			
Step 4	Observations and Conclusions	a. Summarize findings     b. Set out observations and conclusions	a. Partially complete     (supporting comments     provided in the Disposition     table)      b. Partially complete     (supporting comments     provided in the Disposition     table)	See responses to PRT comments in Table 1 (Appendix C).	The content has been updated in the Revised Draft Report to summarize findings, set out observations and conclusions, and to identify future studies and planning needed. Review comment was addressed successfully.

#### 4.3 Municipality of South Bruce's Guiding Principles

The Emergency Services Study informs select principles of the 36 guiding principles established by MSB. The Municipality published a Project Visioning report based on community workshops held in January 2020 that identified areas of community concern and opportunities. Based on the Project Visioning report and further public consultation, MSB passed a Council resolution endorsing the 36 principles that will guide their assessment of willingness to host the APM Project. In light of their importance to MSB, the principles have been individually linked to each of the studies as appropriate to ensure that they were fully considered or accounted for in completing the work (Appendix D).

Three of the 36 principles are linked to the Emergency Services Study: numbers 10, 28, and 32. Table 4.2 lists the principles and how the Emergency Services Study informs those principles.

Table 4.2 The Principles Associated with the Emergency Services Study

#### Principle # and Description

#### 10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.

#### Consideration of the Principle in the Study

At this stage in the Project, there is insufficient information to provide details on the Project's effects on the local emergency service requirements. The Study satisfies the objective of an initial assessment of the effects of the Project on emergency services locally and regionally (Bruce County) during the construction and operations phases. Should the MSB be selected as the host community, it will be the responsibility of the NWMO to execute further studies to determine the emergency response provisions that will be required in the MSB. This will provide further information on Project impacts and risk mitigation, as necessary.

Option 1 aligns with the MSB Guiding Principle #10 with the intent of positive social-economic impacts related to increasing the capacity and capability of emergency services (fire, ambulance, police, and hospital). This cannot be fully qualified until future studies are completed to define the enhancements to plans and resources that would be needed to support the Project. This is demonstrated in the following examples:

- Bruce County paramedic services will need to be involved in discussions with NWMO and health care organizations regarding selecting and equipping hospitals for nuclear-related injuries.
- MSB will need to update its risk assessment study and initiate a study in coordination with NWMO during the pre-construction phase to quantify the construction phase needs of the Project, including the following:
  - Roles and responsibilities of NWMO and MSB emergency services
  - Additional permanent and volunteer fire fighters at the MSB fire department
  - Upgrades to the Teeswater Fire Station including the potential need for additional fire trucks, resources, and building upgrades
  - Increasing the number of fire trucks and other equipment/ resources
  - Mine rescue equipment
  - Training for mine rescue
  - Cost estimates for additional emergency services required to service the Project in MSB
- The Deep Geological Repository Conceptual Design Report also describes the firehall facility, a refuge station, and security monitoring room:

"The firehall (supported by the security monitoring room) will be equipped with detection and monitoring equipment for any fire hazards or smoke from any of the DGR facility operations. Firefighters will be on duty each shift, with other fire team members on standby in the event of an emergency. Two large municipal fire trucks will be available with telescopic ladders, hoses, pumps and all other typical fire-fighting tools." (p. 37)

Principle # and Description	Consideration of the Principle in the Study
28. The NWMO will prepare a review of the existing emergency services in South Bruce and provide appropriate funding for any additional emergency services required to host the Project in South Bruce.	The Study satisfies the objective of an initial assessment of the effects of the Project on emergency services locally and regionally (Bruce County) during the construction and operations phases. Once a host community is selected, it will be the responsibility of the NWMO to execute further studies to determine the emergency response provisions that will be required in the MSB, and to work with MSB emergency service providers to ensure that there is appropriate funding and capacity to provide response to emergencies to meet these growth projections and new hazards requiring update to the response capabilities.
	Option 2 The study does not clearly identify the intent to provide appropriate funding for additional emergency services required to host the Project in South Bruce.
	Peer review comment remains outstanding following the review of V3 of the report.
32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project	The Study satisfies the objective of an initial assessment of the effects of the Project on emergency services locally and regionally (Bruce County) during the construction and operations phases. Should the MSB be selected as the host community, it will be the responsibility of the NWMO to execute further studies to determine the emergency response provisions that will be required in the MSB. This will provide further information on Project impacts and risk mitigation, as necessary.
in South Bruce.	Option 3 aligns with the MSB Guiding Principle #32 with the intent to both consult with the municipality and other local and regional partners to prepare a strategy to ensure sufficient community service. The service applicable to the Study includes emergency services (fire, ambulance, police, and hospital). This cannot be fully qualified until future studies are completed to define the enhancements to plans and resources that would be needed to support the Project. This is demonstrated in the following examples:
	<ul> <li>Bruce County will need to initiate a study in coordination with NWMO during the pre-construction phase to quantify the future needs, particularly in light of the potential Project, including the following:</li> </ul>
	Additional ambulance stations
	Additional paramedics
	Additional ambulances and equipment
	Additional fire services
	Training for nuclear emergencies  Training for mine recovers.
	Training for mine rescue  Cost actimates for additional amarganess consider required to consider the
	Cost estimates for additional emergency services required to service the Project in MSB

including the following:

department

 MSB will need to update its risk assessment study and initiate a study in coordination with NWMO during the pre-construction phase to quantify the construction phase needs, particularly in light of the potential Project,

additional fire trucks, resources, and building upgrades

Roles and responsibilities of NWMO and MSB emergency services Additional permanent and volunteers fire fighters at the MSB fire

Upgrades to the Teeswater Fire Station including the potential need for

Increasing the number of fire trucks and other equipment/resources

Principle # and Description	Consideration of the Principle in the Study		
	Mine rescue equipment		
	Training for mine rescue		
	<ul> <li>Cost estimates for additional emergency services required to service the Project in MSB</li> </ul>		
	<ul> <li>Bruce County paramedic services will need to be involved in discussions with NWMO and health care organizations regarding selecting and equipping hospitals for nuclear-related injuries.</li> </ul>		

#### Conclusions of the Peer Review 4.4

The Emergency Services Study satisfactorily addresses the Work Plan objectives recognizing that it is only an initial assessment, which identifies the overarching changes that will be required by emergency service providers to support the Project.

The Study acknowledges that at this stage, there is insufficient information to provide details on the Project's effects on the local emergency service requirements. NWMO recognizes that further studies will be required to determine the necessary emergency response provisions for MSB and the County of Bruce to support the Project. It is understood that additional work with emergency service providers will be required to ensure that there is appropriate funding and capacity to provide the necessary response levels to emergencies and capabilities that will meet the expected growth projections and the new hazards that will be inherently associated with the Project.

Valuable insight was provided through the Study citing existing project examples in the broader area such as Bruce Power and Compass Minerals (Goderich Salt Mine in Huron County) that have implemented and maintained emergency service needs for radiological hazards and mines, respectively, with the implementation of internal capacity and capabilities that are supported by public emergency services. Although area specific examples are seen as a valuable contribution to the Study, the PRT recognizes that there are other jurisdictional or organizational frameworks and public emergency service support structures that have been successfully implemented on projects outside of the Study's assessment. As a result, the PRT recommends that these frameworks and structures should also be considered by NWMO as part of further studies to ensure best fit and operational readiness for MSB and Bruce County.

The Study identified that all required emergency service capabilities and capacity do not currently exist in the region to support the Project. The Study does indicate there is sufficient time to conduct required engagement and planning with MSB and neighbouring municipalities to address Project needs prior to construction. Further, the Study acknowledges that the stakeholders including NWMO, MSB, County of Bruce, industry partners, provincial agencies, and federal agencies will all have a role to play in supporting the emergency service elements for the Project. NWMO recognizes that they will need to conduct further studies to define the supported needs, capabilities, capacities, and the funding instruments that will be needed for each emergency service to functionally support the Project.

The framework(s) for success already exist for the assessment of hazards, implementation of plans, and the integration of public service support through existing facilities and projects both inside and outside of the region, which reflect the requirements of the CNSC, OFMEM, and Transport Canada. These frameworks should guide future studies that will be needed to qualify the incremental changes including planning, resources, (people, equipment) and ongoing program maintenance with specific attention to MSB's Guiding Principles to ensure they are maintained and addressed fully when moving forward with the Project.

# Appendices

# Appendix A

**List of Socio-Economic Community Studies** 



# **Appendix A. List of Socio-Economic Community Studies**

ID	Study Name	Study Proponent	Lead Consultant
E01	Local Economic Development Study & Strategy	MSB	Deloitte
E02	Economic Development Program - Youth	MSB	Deloitte
E03	Local Hiring Effects Study & Strategy	MSB	Deloitte
E04	Demographics	MSB	Deloitte
E05	Agricultural Task Force/Agricultural Business Impact Study	MSB	Deloitte
E06	Fiscal Impact and Public Finance	MSB	Watson & Associates Economists
E07	Tourism Industry Effects & Strategy	MSB	Deloitte
E08	Housing Needs and Demand Analysis Study	NWMO, MSB	Keir Corp.
E09	Labour Baseline Study	NWMO	Keir Corp.
E10	Workforce Development Study	NWMO	Keir Corp.
E11	Regional Economic Development Study	NWMO	Keir Corp.
E12	Property Value Monitoring Program		
I21	Aggregate Resources Study	NWMO, MSB	Keir Corp.
122	Infrastructure Baseline and Feasibility Study	NWMO	Morrison Hershfield
123	Local Traffic Effects Study	NWMO	Morrison Hershfield
124	Road Conditions Effects Study	NWMO	Morrison Hershfield
S13	Effects on Recreational Resources	MSB	Tract Consulting
S14	Local/Regional Education Study	NWMO, MSB	DPRA
S15	Land Use Study	NWMO, MSB	DPRA and MHBC
S16	Social Programs Study	NWMO, MSB	DPRA
S17	Emergency Services Study	NWMO	DPRA and IEC
S18	Vulnerable Populations Baseline and Effects Study	NWMO	DPRA
S19	Effects on Community Safety		
S20	Community Health Programs and Health Infrastructure Study	NWMO	DPRA

# Appendix B

**Peer Review Protocol** 



## South Bruce Consultants Peer Review Protocol

#### **Protocol for Peer Review Process**

- The scope of the peer review is variable for each NWMO study (Study). The scope and objective of each Study is variable. The Study may include development of information, data and documents in the form of a:
  - Statement of Work
  - Work plan
  - Baseline conditions
  - Modeling/prediction/forecast of future conditions
  - An assessment of impact/benefits

Not all NWMO studies will include each of the above listed elements. While a collaborative peer review approach is to be used, it is important to maintain independence during the peer review process.

- Develop an initial understanding of NWMO inputs to conducting the Study including timing, availability and sources of information.
- 3. Meet with NWMO and their consultants to
  - compile a list of information/documents that will need to be reviewed as part of the Peer Review
  - compile a list of parties/agencies providing information for use in preparing the Study
  - identify additional information/sources that may be pertinent to the Study
- Undertake an initial review of the information/documents assembled and developed for the Study
  - Peer review of the SoW will include information and data pertaining to some or all of the following elements:
    - i.) Statement of Work (SoW)
    - ii.) Work plan
    - iii.) Baseline conditions
  - Provide questions/comments to NWMO on the available information/documents and ensure they have been adequately addressed with the community in mind.
- Conduct peer review of the Study findings as they are developed which may include the following: 5.
  - i.) Project design(s)
  - ii.) Modeling of future conditions
  - iii.) Impact assessment approach
  - iv.) Impact assessment findings
  - v.) Analysis of reliability
  - If warranted, work with NWMO and their consultants to conduct a site visit
- Meet with NWMO and their consultants to:
  - Seek clarifications of the information/documents reviewed
  - Ensure a full understanding of the assessment approach and findings
  - Present the preliminary peer review findings (concurrences and concerns)

- Provide questions/comments and peer review findings and ensure they have been adequately addressed with the community in mind.
- 7. Review NWMO draft reports
  - Complete a detailed review of the draft reports
  - Identify omissions and/or inconsistencies if they occur with SOW and Work Plan
- 8. Prepare draft Peer Review Report for submission to South Bruce for comments.
  - Include a summary of peer review observations, findings, and comments
- 9. South Bruce will review with RedBrick for communications to public
- 10. Finalize and present the Peer Review Report to South Bruce and NWMO
- 11. Each consultant will need to provide a presentation of the findings of the peer reviews to the CLC.

#### **Table of Contents for Peer Review Report**

- 1. Introduction
  - a. State the purpose of the Peer Review Report (Report)
  - b. Provide capsule summary of the proposed Project
  - c. Identify the NWMO Study that is being peer reviewed
  - d. Identify the NWMO Statement of Work for completing the Study (i.e., SOW from EOI or update)
  - e. Identity participants involved in conducting the Study
  - f. Identify the time period the Study work and Peer Review was carried out
- 2. Peer Review Objectives and Process
  - a. State objectives for conducting the Peer Review which include
    - To provide the community of SB with independent review by qualified subject matter experts
    - ii. To complete a peer review of the NWMO Assessment of potential impacts and proposed benefits in comparison to existing conditions
    - iii. To review how the potential impacts and proposed benefits adhere to the 36 principles that will guide the assessment of willingness to host the Project.
  - b. Describe the Peer Review Process Undertaken
    - i. Describe the Peer Review process that was carried out.
    - ii. List activities completed (e.g., site visits, work plan review, data review, report review, meetings, etc.)
- Documentation and Information Reviewed
  - a. List NWMO study specific information reviewed which may include:
    - i. Scope of work
    - ii. Detailed work plan
    - iii. Baseline Conditions
    - iv. Assessment Approach
    - v. Assessment Findings
  - b. List parties/agencies involved in providing information into the study
  - c. List all documents/meetings/data/additional information and include a short summary of each
- 4. Peer Review Findings and Resolution
  - a. Baseline Conditions Report (concurrences and concerns and resolution)

- b. Impact Assessment (IA) Report
  - i. IA approach (concurrences and concerns and resolution)
  - ii. IA findings (concurrences and concerns and resolution)
- c. Conclusions of peer review
- d. Adherence to the 36 principles which are pertinent to the study
- 5. Summary

# Appendix C

**Peer Review Comments Memo** 



## **Memorandum**

#### September 14, 2022 - updated November 1, 2022

То	Dave Rushton/Catherine Simpson, Municipality of South Bruce			
Copy to				
From	Greg Ferraro and Ian Dobrindt/AD/mma	Tel	+1 519 884 0510	
Subject	Emergency Services Study (S17) Draft Report – Peer Review Comments  11224152-MEM-34			

#### 1. Introduction

This memo provides the Municipality of South Bruce (South Bruce) peer review team's comments on the Emergency Services Study (S17) Draft Report (Draft Report) prepared by DPRA Canada Inc. (DPRA) and Independent Environmental Consultants (IEC; March 17, 2022) for your consideration and internal circulation as per the South Bruce Nuclear Exploration Project joint study review flow process. In addition, the memo will be submitted to the Nuclear Waste Management Organization (NWMO) and their consultants (DPRA, IEC) by GHD Limited (GHD) as per the peer review protocol process.

## 2. Peer review approach

The peer review of the Draft Report was carried out by GHD and Radiation Safety Institute of Canada (RSIC). The peer review process was completed in alignment with the peer review protocol that was developed to support a collaborative approach between NWMO and South Bruce while maintaining independence during the process. In accordance with the peer review protocol process, GHD and RSIC (Subject Matter Experts) and GHD (Lead Consultant) considered the following information during our individual reviews of the Emergency Services Study Draft Report:

- Emergency Services Study Statement of Work (May 2021)
- Southwestern Ontario Emergency Services Study Work Plan (S17), prepared by DPRA (October 7, 2021)
- Knowledge holder interviews
- Peer review comments on NWMO's draft project description for South Bruce community studies memo prepared by GHD Limited (November 18, 2021) and responded to by NWMO (January 27, 2022)
- South Bruce and area growth expectations memo prepared by metro economics (February 7, 2022)

GHD reviewed the Draft Report having the following questions in mind:

- Are there any significant concerns, issues, and/or omissions with the Draft Report?
- What are our initial observations/impressions on the Draft Report?
  - Has the statement of work and work plan been complied with?

- Has pertinent information gained from knowledge holder interviews been included?
- Has a previous NMWO response of deferring a peer review team comment to the Draft Report task been complied with?
- Have peer review comments made during the community study workshops been addressed?
- Does the Draft Report reflect the most current information available?

GHD held an internal 10-day Peer Review Check-In Meeting working through the preceding questions. Following this, we shared our initial observations/preliminary comments with NWMO and their consultant during a discussion on September 1, 2022, where questions were asked, clarifications were sought, and suggestions were offered. Following this discussion, our substantive comments were finalized as listed in the Comment Disposition Table (**Table 1**).

#### 3. Peer review comments

As stated above, the comment disposition table (**Table 1**) lists our combined comments on the Draft Report. It is understood that NWMO and their consultants will provide responses to these comments and address each comment where appropriate as part of finalizing the report.

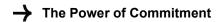
Based on completion of the peer review and follow up discussions with NWMO and their consultants, the inputs presented in the Draft Report are found to support the overall objective to assess the effects of the Project on emergency services locally and regionally (Bruce County) in the construction and the operations periods.

In general, the study as described in the Draft Report substantially complies with the statement of work and work plan in terms of study areas and information developed and included. **Table 2** summarizes the peer review's assessment of the Work Plan.

NWMO/DPRA/IEC issued the Final Report V3 on October 28, 2022. The PRT reviewed the updates made in the Final Report V3 and identified that a number of comments remain outstanding. Details on the outstanding PRT comments can be found in **Table 1**.

Table 1 Emergency Services Study Report Comment Disposition Table

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
1	2.4 Study Limitations	(Number 2, 4) Is this a limitation of the availability of information or time to collect or interact with the respective knowledge holders? Further information may be readily available through interactions with stakeholders and therefore this limitation may not stand up to public and/or stakeholder scrutiny.	(Number 2)  The limitation is not the availability of the information, it is the inconsistency in the level of details provided by the various municipality/county departments.  The only limitation that will be included in the revised report is a reworded #2. E.g., "The study is based on best available information at this point in the design process. The level of detail in the information available from NWMO, and on emergency services at the County and lower tier municipal level varies. Therefore, the level of data presented for each municipality in the <i>Emergency Services Study</i> also varies."	Limitation #2 was revised in the Revised Draft Report. Review comment was addressed successfully.
2		(Number 3) Why specifically is the addition of this information considered to be a limitation?	(Number 3) See response to number 2.	Limitation #3 was removed from the Revised Draft Report. Review comment was addressed successfully.
3		(Number 4) Why is the Kinectrics Laundry Facility included in the Study? We question what value the inclusion of this group has for the study as its inclusion as a limitation may highlight shortfalls in the study that are not necessary.	(Number 4) See response to number 2 – limitation #4 will be removed from the revised report. While reference to the Laundry facility is eliminated from Section 2.4, it is mentioned several times later in the report. It is included because it is a new nuclear facility in MSB and maybe able to provide some insight on how such a facility is being incorporated into the local emergency services. Although only preliminary information was found at the time of report writing, we are trying to find additional published information	Limitation #4 was removed from the Revised Draft Report. Review comment was addressed successfully.
4		(Number 5 a, c) Was there an expectation that all knowledge holders would be subject matter experts (SME) on the project and the hazards involved?	(Number 5 a, c.) See response to number 2 –limitation #5 will be removed from the revised report.	Limitation #5 was removed from the Revised Draft Report. Review comment was addressed successfully.



Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
		We do not see these expressed limitations as actual limitations to the Study but just facts of the current state capabilities for the knowledge holders. We question if it is reasonable for the Study to have an expectation that the various emergency services have knowledge of the project, the emergency service needs to support the project, or have implemented any services to meet these needs. Furthermore, we question if it is reasonable to expect that knowledge holders would be able to comment on the specific incremental changes that would be needed by their organization in terms of changes to plans, human resources, training, infrastructure, or equipment.		
5		The identification of the incremental changes to fire and injury response capabilities that may be needed by Bruce County and the Municipality of South Bruce during the construction period is one of the primary objectives of this study and we strongly encourage that this not be identified as a limitation in the Study.  As a supporting example a fire department must plan for growth in their community and estimate changes in services, capabilities, and capacity.  It is strongly encouraged that this Study use established practices to estimate what the emergency service needs will be, and the incremental changes needed by the various emergency services to support the project.	See response to number 2 – this limitation will be removed from the revised report.	Limitation was removed from the Revised Draft Report. Review comment was addressed successfully and clarified with the indication in the Revised Draft Report that future studies and engagement would be needed to qualify the incremental changes that would be required by MSB and Bruce County.
6		Recommended suggestions:  (a) We strongly encourage that additional research or interviews be completed to overcome the inconsistencies in the county and lower tier municipal information in the Study.	<ul> <li>(a) Additional interviews will not be conducted for this study; additional engagement could occur as part of future studies if the Project is located in the South Bruce Area.</li> <li>(b) See response to number 2.</li> </ul>	(a) Position acknowledged.  (b) Limitations were removed or revised in the Revised Draft Report Review comment was addressed successfully.

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
		<b>(b)</b> We strongly suggest that Limitations 2, 3, 4, 5 (a, c) be addressed and/or removed from the Study, as applicable.	(c) The final paragraph of Section 2.4 will be revised as follows:  "As a result, w While the nature of changes	(c) Revisions made in the Revised Draft Report. Review comment was addressed successfully.
		(c) We strongly suggest the final paragraph be revised to remove all exculpatory language and only identify that future studies and engagements will be needed to support or better define the options identified in the Study.	that may be required in the existing municipal ERPs (e.g., the Bruce County ERP, MSB ERP) and an outline of the types of changes and steps required to revise the ERPs has been provided in the <i>Emergency Services Study</i> , these cannot be highly specific or quantified, nor can cost estimates (even qualitative) be prepared in the absence of additional FUTURE study and engagement-to address the limitations identified above."	
7	3. Existing Conditions	(a) We believe that the content and format of this section may prove difficult for the	(a) While there are probably many variations to present this information, we	(a) Content and format revised in the Revised Draft Report. Review comment
	(moved to be S. 4 in the revised	community reader to understand. In addition, we suggest that considerations be	feel the version used is as good as any other and we maintain it.	was addressed successfully.
	report)	made that the community reader may not have the knowledge to understand how this information is relevant to the project.	(b) The gaps are not part of the existing conditions, rather, they are part of the	<ul><li>(b) Position acknowledged.</li><li>(c) Content and format revised in the</li></ul>
		(b) Many of the sections omit the gaps that were identified in the interviews.	qualitative analysis of the existing conditions which is provided in Section 5 of the report 'Preliminary Analysis/Effects Assessment'.	Revised Draft Report. Review comment was addressed successfully.
		(c) The sections are not organized to	, research in the second of th	(d) Position acknowledged.
		(highlight the emergency service needs of the project (fire suppression, medical, medical transport, mine rescue, radiological material safety, security, etc.) as they may apply to the agency or stakeholder.	(c) We believe that everything is included but will review to ensure that the content will include all emergency service stakeholders and agencies that are listed in 2.3.	(e) Content has been updated in the Revised Draft Report. Review comment was addressed successfully.
		Recommended suggestions:  (d) We strongly encourage that additional content be added to each section to highlight both the capabilities and gaps in the various emergency services.	(d) The gaps are not part of the existing conditions, rather, they are part of the qualitative analysis of the existing conditions which is provided in Section 5 of the report.	
		Additionally, it is suggested that a common structure should be used throughout this	(e) We believe that everything is included but will review to ensure that the content	

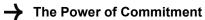


Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
		section that allows the reader to understand how the information is related to the proposed project.  (e) We strongly suggest that content be presented for all emergency service stakeholders and agencies that are listed in 2.3. If content is missing, then additional research efforts and/or interviews should be completed and are strongly encouraged.	will include all emergency service stakeholders and agencies that are listed in 2.3.	
8	4. NWMO Project Characteristics Relevant to Emergency Services (moved to be S. 3 in the revised report)	<ul> <li>(a) Upon review of the content in Section 4, we believe that this section may be incomplete and may not communicate all the project characteristics relevant to emergency services for the project. Additionally, this section may be confusing to the community reader based on how the information is communicated.</li> <li>(b) The listings of the activities may be incomplete, and we believe could be easily scrutinized.</li> <li>(c) We believe the listings should form the foundation for the Study. This is the list of activities/ hazards that the reader needs to be able to connect to the emergency service needs, which should also cascade through the sections of the Study.</li> <li>(d) This section does not currently provide a connection to the emergency services that may be required to support the characteristics/ activities presented.</li> <li>Recommended suggestions:</li> <li>We strongly encourage that additional content be added to this section that would include, but not be limited to:</li> </ul>	<ul> <li>(a) We will review the available information to ensure that all available relevant information is considered in this report. We will also review this section to ensure it provides a connection to the emergency services that may be required to support the characteristics/activities presented.</li> <li>(b) We will review the available information to ensure that all available relevant information is considered in this report. We will also review this section to ensure it provide a connection to the emergency services that may be required to support the characteristics/ activities presented.</li> <li>(c) A one-to-one list of emergency services needs for each activity will be provided in this section. A draft of this table was provided to the NWMO/MSB/Peer Review Team on September 12.</li> <li>(d) A one-to-one list of emergency services needs for each activity will be provided in this section, as per response to 8c.</li> <li>(e) The level of detail contained in the report includes all the information that was available to IEC from NWMO and is sufficient for the level of analysis being</li> </ul>	The new tables with one-to-one listing of emergency services needs (now in Section 3) are a helpful way to list the potential emergencies and the potential emergency services that may be required. It is the PRT's opinion that there are some potential emergencies missing from the listings:  Table 3.2:  - 1st activity (Continuous development of the DGR) is missing one potential emergency:  • "concurrent radiological emergency in DGR placement area" which would involve the following potential emergency services:  • Radiation emergency response  Peer review comment remains outstanding following the review of V3 of the report.  - 2nd activity (Surface facilities to receive, handle, process) are missing two potential emergencies:  • Illness of worker or conventional workplace injury in radiological impacted area / radiation work area. Potential emergency services for this are:  • Paramedics / hospital with radioactivity capabilities

Comment	Report Section	Comments from Peer Review	How and Where Comments are	Peer Review Responses to DPRA
Number	Reference		Addressed	Comments
		(e) A more comprehensive list of characteristics/activities that can reasonably be expected during the project phases  (f) Separation between surface and subsurface activities so the reader can follow this throughout the Study.  (g) A relevant listing of emergency services that are associated with each section, so the reader understands the connection from the activities through to the emergency services needed to support them. Depending on how this is structured, there may be a need to identify the hazards for each activity to bridge the information and make the required connections.	undertaken at this point in time. However, another quick review of the information will be undertaken. A more comprehensive list of characteristics/activities may become available during the next 10 years of project planning prior to construction and should be considered in further future studies following site selection.  (f) We will separate the activities between surface and subsurface categories.  (g) A one-to-one list of emergency services needs for each activity will be provided in this section, as per response to 8c.	<ul> <li>Radiation emergency response</li> <li>Failure of exhaust filtration for radiological work areas — radioactive material release to the environment. Potential emergency services for this are:         <ul> <li>Radiation emergency response</li> <li>Police (traffic control – restrict traffic entering affected area / evacuation)</li> </ul> </li> <li>Peer review comment remains outstanding following the review of V3 of the report.</li> <li>3rd activity (hoisting, handling, and processing of used), 4th activity (placement of used nuclear fuel underground), and 8th activity (active solid waste handling facility) are all missing one potential emergency:         <ul> <li>Illness of worker or conventional workplace injury in radiological impacted area / radiation work area. Potential emergency services for this are:</li></ul></li></ul>

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				<ul> <li>Dangerous goods spills are defined in varying ways in the Table (hydrocarbon spill response, spill response, fuel spill response, hazmat spill response, emergency/ spill response). It is suggested that all iterations be defined as dangerous goods responses or non-dangerous goods responses.</li> <li>Peer review comment remains outstanding following the review of V3 of the report.</li> </ul>
9	5. Preliminary Analysis/	(a) We believe that the content and format of this section may prove difficult for the	(a) The structure of this section is consistent with the structure in section 3.1	(a) Position acknowledged.
	Effects Assessment	Effects community reader to understand. In and the list provided in section 2.3, and w	and the list provided in section 2.3, and will	(b) Position acknowledged.
	not have the knowledge to understand how this information is relevant to the project.  (b) Additionally, we expected the analysis and effects content to be much more prescriptive for the various emergency services. In some cases, we found that this information may be missing altogether.  (c) NWMO emergency service coverage through each of the Project phases is not alcorate defined and may be incomplete.	(b) The analysis and effects content for the various emergency services is consistent with the level of information available at		
		and effects content to be much more prescriptive for the various emergency	this time. Currently most of the project related information is qualitative and at a very preliminary stage which does not	(d) Position acknowledged
			support a prescriptive analysis. A more prescriptive analysis can only be provided later in the NWMO process following site selection and in further studies during 10 years of project planning when more detailed information about the project is	(e) Position understood and content revised throughout the Revised Draft Report to document this approach. Review
		(c) NWMO emergency service coverage years of project planning when mo		comment was addressed successfully.
			available.	(f) Content related to OPP and RCMP was added and/or revised in the Revised Draft
		(d) Overall, the effects on the various emergency services and agencies we do not believe are clearly defined.	(c) We believe that everything is included but will review to ensure that the content will neclude all emergency service from	Report. Review comment was addressed successfully.
	(e) The objective to identify the incremen increases in response capabilities that m	(e) The objective to identify the incremental	NWMO including those mentioned in Section 5.1.	(g) Content was added and/or revised in the Revised Draft Report. Review comment was addressed successfully.
		increases in response capabilities that may be needed for Bruce County and the MSB	(d) The analysis and effects content for the various emergency services is consistent with the level of information available at this time. Currently most of the project	

<sup>&</sup>lt;sup>1</sup> Note that these responses in Table 4.1 refer to the original sequencing of the March 2022 draft V1. Based on the discussion with the DPRA/IEC on September 1, 2022, the order of Sections 3 'Existing Conditions' and 4 'NWMO Project Characteristics Relevant to Emergency Services' was switched in the revised V2 report.



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		(f) Law enforcement (police) and community safety capabilities are missing from the opening list, and we believe to be inadequately covered in this section.	related information is qualitative and at a very preliminary stage which does not support a prescriptive analysis can only be provided	(h) Content was added and/or revised in the Revised Draft Report. Review comment was addressed successfully.
		Recommended suggestions:  (g) We strongly encourage that additional content be added to meet the requirements and the intent of the Southwestern Ontario	later in the NWMO process following site selection and in further studies during 10 years of project planning when more detailed information about the project is available.	(i) One-to-one relevance between the emergency services and Project activities was added in the Revised Draft Report. Review comment was addressed successfully.
		Emergency Services Study Work Plan (S17).  (h) We strongly encourage that information be organized in a similar format throughout	(e) The incremental response capabilities that may be needed for Bruce County and the MSB are discussed qualitatively based on the information available.	(j) Position acknowledged and revised content was included in the Revised Draft Report that specifies and better explains the NWMO services and support needs. Review comment was addressed
		this section, which can enable readers to make the appropriate connections to other sections of the study. Some examples as follows:	(f) Discussion on OPP was included under the provincial heading. It will be added to the opening list. The nearest RCMP detachment is far away from the emergency services study area.	successfully.  (k) Position acknowledged.
		(i) Summary of the current capabilities, as specifically related to the proposed project needs, in each phase.	(g) We believe that everything is included but will review to ensure that the content will include all emergency service	(I) Position acknowledged.
		(j) A summary of the services that NWMO intends to supply that do not necessarily need to be considered by the service/agencies.	stakeholders and agencies that are listed in 2.3.	
		(k) A summary of the changes or enhancements (effect on the current service) to emergency service elements that are remaining that will need to be	(h) The structure of this section is consistent with the structure in Section 3 and the list provided in Section 2.3, we will review to ensure consistency.	
		addressed if the project moves forward. In some cases, this will need to be specific incremental change details required by the Study objectives).	(i) This is discussed in detail in Section 3. In addition, as discussed above (item number 3) under Section 4, we will provide one-to-one relevance between the emergency services and project activities.	
		(I) Strongly suggest that this section uses the same format as the previous sections	(j) The services proposed by NWMO at this stage of the process/point in time are provided in Section 4. The integration of	



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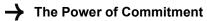
Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
		and separate the information by project phase and location, as necessary.	NWMO services with those of the community/emergency services parties will be developed later in the planning process as a future study following site selection, as discussed in the report. However, a table can be added showing services that NWMO can provide/that do not need to be considered by external services/agencies.  (k) The analysis in Section 5 identified that gaps in the community ES and changes that need to be implemented including the qualitative assessment of the changes required to the Bruce County Emergency Response Plan (ERP) and incremental fire and injury response capability needed from Bruce County and the Municipality of South	
			(I) The structure of this section is consistent with the structure in Section 3 and the list provided in Section 2.3, we will review to ensure consistency.	
10	5.1 NWMO	(a) We believe this section could benefit from a better explanation to the community reader what emergency service elements NWMO intends to implement for the Project. Details related to assessment, planning, resources (people/ equipment), and most importantly the capabilities as it relates to the Project are suggested to be included. These would be foundational pieces of information that are needed to define what assistance the NWMO would like the various emergency services to provide in support of the Project. We suggest this information be better organized for the reader and be tailored to each of the Project's phases and the applicable hazard areas as presented below:  — Construction (above ground)	<ul> <li>(a) We will organize the information provided in Section 5.1 in the manner suggested for surface and subsurface activities during construction and operation phases.</li> <li>(b) This information is not currently available at a detailed level, and will have to be provided by NWMO at a later stage/in future studies. However, the options in Section 6 speak to the types of plans that need to be prepared in the future, and include illustrative considerations based on consultant SM knowledge.</li> <li>(c) Section 4 and 5.1 provides the information currently available from</li> </ul>	(a) The new Table 5-1 is a good listing to summarize the emergency response needs for the Project and interaction with community emergency response providers. However, it is the PRT's opinion that the table is missing the need for a provision for response to worker injury or illness as related to potential radiological hazards (e.g., potential injured or ill workers with radiological contamination).  Peer review comment remains outstanding following the review of V3 of the report.  In addition, some cells in Table 5-1 have multiple elements within them that are subsequently grouped into a need for support statement (yes/ no) for community emergency services. We would suggest separating the different elements and

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	<ul><li>Construction (below ground)</li><li>Operations (transportation)</li><li>Operations (above ground)</li></ul>	NWMO. Additional information will be provided at a later stage.	applying confirmation (via yes/ no selection) to each element so the reader can better understand the community support requirements.
	Operations (below ground)  Recommended suggestions: It is strongly suggested that the following specific questions be answered within the text of this section:  (b) What assessments and plans will the NWMO complete and implement for each	<ul> <li>(d) For NWMO emergency services refer to Sections 4 and 5.1 which provide the information currently available from NWMO.</li> <li>(e) We will ensure that in Sections 4 and 5, the roles of the paramedic services and NWMO with regards to injuries and transportation to hospitals are discussed.</li> </ul>	Finally, we suggest that the community support allocation (yes) be reviewed for "Firehall facility with two large municipal fire trucks will be available with telescopic ladders, hoses, pumps". This seems to imply that NWMO would require MSB support to build and resource their fire hall facility.
	(c) What capability level does the NWMO intend on implementing as it relates to emergency services for the DGR construction and operation?	(f) NWMO will be responsible for security threats. A brief reference to the available information in Section 8 ('Site Security and Safeguards) in the DGR Conceptual Design Report (Naserifard et. al. Sept. 2021) will be added to the revised report.	Peer review comment remains outstanding following the review of V3 of the report.  (b) Position acknowledged, and revised content in the Revised Draft Report better specifies NWMO's emergency service stand-up for the DGR construction and
	(d) Will the NWMO be taking on responsibility for fire suppression in all phases of construction and operation?	These aspects of security were not considered to be part of this study.  (g) The requirements process to become a stakeholder member for Ontario Mine	operations phase. Review comment was addressed successfully.  (c) Position acknowledged.
	(e) Will the NWMO be taking responsibility for medical services including transportation to hospital, assessment, and treatment, and if so, to what level?	Rescue will be discussed.  (h) For NWMO emergency services refer to Sections 4 and 5.1 which provide the information currently available from	(d) Revised content in the Revised Draft Report better specifies the role of the paramedic services. Review comment was addressed successfully.
	(f) Will the NWMO be taking responsibility for security threats (theft, mischief, terrorism, physical security, cyber security), and if so, to what level?  (g) Will the NWMO be completing mine	NWMO.	(e) Revised content in the Revised Draft Report better specifies the role of the NWMO, OPP and RCMP for security events. Review comment was addressed successfully.
	rescue and what would the process to become a stakeholder member for Ontario Mine Rescue entail?  (h) Will the NWMO be providing radiological support services outside of the		(f) Revised content in the Revised Draft Report specifies and better explains the requirements for becoming a stakeholder member of Ontario Mine Rescue. Review comment was addressed successfully.

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		Facility (e.g., transportation-related events, during the transport of an injured person to a medical facility, etc.)?		(g) Position acknowledged and will be addressed in future work
11	6.1 Options Assessment	(a) When the other sections of the Study are amended it is suggested that this section be revised accordingly.  Recommended suggestions:  (b) We strongly recommend that this section be able to satisfy the emergency service element gaps identified in the Study for each of the Stakeholders and Agencies.  (c) We look at this like a mass balance equation for the study. Analogy equation: The needs and requirements of the project (Section 4 – NWMO Project Characteristics Relevant to Emergency Services) – (minus) the current capabilities (Section 3 – Existing Conditions) and the future state capabilities NWMO intends to provide (Section 5.1 – NWMO) are analysed to determined the remaining emergency service elements (information, studies, plans, resources [people/equipment], MOU/MAA/MEAA, training, exercises, etc.) needed to cover the requirements of the project (Section 5 – Preliminary Analysis/Effects Assessment) = A list of emergency service elements that are addressed in the Options Evaluation section of the Study.  (d) It is suggested that the options assessment content address option(s) to satisfy the remaining emergency service element. The Study should be able to demonstrate that everything plausible was considered and that the NWMO has figured out option(s) to cover off all the emergency	(a) The Options section is being totally reorganized and will be presented under the headings of each of the 3 study Objectives.  (b) We believe this is what we did with the information available at this point in time. As per above responses, additional detail can be determined via future studies if the Project is located in the South Bruce Area.  (c) Our analysis is based on identifying gaps (Section 5) between the existing conditions (Section 3 [now Section 4 in revised report]) and ES needed (Section 4 [now Section 3 in the revised report]) and providing options for addressing these identified gaps (Section 6). As noted in several responses above, additional detail can be determined via future studies if the Project is located in the South Bruce Area.  (d) A gap analysis of the NWMO ES needs for the proposed Project is not within the scope of this study. It is expected that NWMO option(s) to cover off all the emergency service needs through the construction and operations phases of the project will be further developed during the 10 years of project planning following site selection, and can not be discussed meaningfully or in detail at this time.	<ul> <li>(a), (b), and (c) the Revised Draft Report is an improvement by better identifying the emergency service needs of the Project and delineating the anticipated burden between the NWMO and the supporting public agencies. The Revised Draft Report additionally indicates that that the NWMO has more work to do on this requirement Further studies on the planning to quantify the needed changes to the local emergency response capability and capacity are recommended. Collectively the review comments in this section were addressed successfully.</li> <li>(d) Position acknowledged and will be addressed in future work</li> </ul>

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		service needs through the construction and operations phases of the project.		
12	Theme: Transport Canada Requirements and Resources  3.1.1 CANUTEC (a-c)  3.6 Industry (d-e)	<ul> <li>(a) The Transportation of Dangerous Goods (TDG) Act outlines the requirements for an ERAP. If an ERAP holder does not immediately respond, or if the ERAP holder is unknown, and when necessary to protect public safety, Section 7.1 of the TDG Act allows Transport Canada to:</li> <li>(b) Direct a person with an approved ERAP to implement their plan in order to respond to a release or anticipated release.</li> <li>(c) Authorize a person with an approved ERAP to implement their plan, if it is unclear who is required to have an ERAP for the dangerous goods involved in an incident.</li> <li>(d) It is suggested that this Section 3.1.1.be renamed to Transport Canada and there be sub-sections added for ERAPs and CANUTEC.</li> <li>(e) Additionally, this section does not specifically outline the individuals (companies or agencies) who will hold ERAPs to cover the transportation of the UNF as required by Part 7 of the TDGR. Prior to transport, the individual who is offering the UNF for transport must apply to Transport Canada for an ERAP. The application to Transport Canada includes a plan that outlines elements of the required technical advice and the resources (trained personnel, and specialized equipment) that will respond to support an incident that</li> </ul>	<ul> <li>(a) We will include the ERAP section in the revised report as suggested. We also mention the requirements for preparation of ERAP as a general note.</li> <li>(b) It should be noted that the ERAP will be developed by a Party responsible for transportation of UNF; the specific details are not known at this time.</li> <li>(c) It should be noted that the ERAP will be developed by a Party responsible for transportation of UNF; the specific details are not known at this time.</li> <li>(d) Agree, we will rename section 3.1.1.2 and create subsections mentioned.</li> <li>(e) It should be noted that the ERAP will be developed by a Party responsible for transportation of UNF; the specific details are not known at this time.</li> </ul>	(a), (b), (c), and (e) for the original version Section 3 (now Section 4 in Revised Draft Report)  The new wording in the Revised Draft Report Section 5.2.1.2 for the ERAP is incorrect. The NWMO will not be mandated by the TDG Act and Regulations to develop the ERAP. The individual who offers the material for transport will be responsible for the ERAP. It could be noted that the NWMO will provide support to the individual(s) offering the UNF for transport in their development and implementation of an ERAP. As a result, we recommend that the current text in the Revised Draft Report be revised accordingly.  Peer review comment remains outstanding following the review of V3 of the report.

<sup>&</sup>lt;sup>2</sup> Note that these responses in Table 4.1 refer to the original sequencing of the March 2022 draft V1. Based on the discussion with the DPRA/IEC on September 1, 2022, the order of Sections 3 'Existing Conditions' and 4 'NWMO Project Characteristics Relevant to Emergency Services' was switched in the revised V2 report.



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		occurs during transport (including loading and unloading). Transport Canada must approve the plan before the UNF may be transported within Canada.		
13	Theme: CNSC Mandate and Authority:  Section 3.1.2 – Provincial Level	(a) From the Canadian Nuclear Safety Commission (CNSC) website, the following four points are currently listed as their mandate, however, only the first point is addressed within the Report. All points associated with the CNSC mandate should be relevant to the examination of the impact of the Project on emergency services in the community:	(a) We only provided CNSC regulations that are directly relevant to this Project.  While we feel this will cause confusion with the reader, we are prepared to list all four of the CNSC mandates in the CNSC section but will not discuss those that are not directly relevant to the <i>Emergency Services Study</i> .	(a), (b), and (c) Review comments were addressed successfully.
		<ul> <li>Regulation of the development, production and use of nuclear energy in Canada to protect health, safety and the environment</li> <li>Regulation of the production, possession, use and transport of nuclear substances, and the production, possession and use of prescribed equipment and prescribed information</li> <li>Implementation of measures respecting international control of the development, production, transport and use of nuclear energy and substances, including measures respecting the non-proliferation of nuclear weapons and nuclear explosive devices</li> <li>Dissemination of scientific, technical and regulatory information concerning the activities of CNSC, and the effects on the environment, on the health and safety of persons, of the development, production, possession, transport and use of nuclear substances</li> <li>(From: <a href="https://nuclearsafety.gc.ca/eng/about-us/our-mission.cfm">https://nuclearsafety.gc.ca/eng/about-us/our-mission.cfm</a>)</li> </ul>	<ul> <li>(b) Our understanding is that the CNSC's regulatory role will apply throughout the Project lifecycle. This will be further discussed with/confirmed by NWMO and reflected in the revised report.</li> <li>(c) NWMO cannot start construction without a licence to construct from CNSC, even though these activities do not involve radioactivity.</li> <li>Agree that other regulatory agencies have a role during construction; those that have a role relevant to emergency services have been discussed in the report. The broader roles of various regulatory agencies in the different phases is beyond the scope of this study.</li> <li>We note that Decommissioning/ Monitoring phases are not included in this study.</li> </ul>	

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		It is suggested that this section be updated to include all points of the mandate.		
		Additionally, the 3rd sentence in this section is "The CNSC would provide licencing related approvals for Project activities including emergency preparedness and response."		
		(b) Based on our understanding, the CNSC will provide licencing related approvals for Project activities involving the possession and handling of radioactive material/UNF and be involved in the approval of the facility design to ensure that the activities of handling and storage of the radioactive material/UNF are in accordance with their regulations.		
		(c) However, it should be noted that the CNSC would not be the regulator for the entire Project. For example, the CNSC will have little to no role during the actual construction phase. They do not have a role in licencing during the building of the buildings or the digging of the mine access. Their licencing role includes possession and handling of the UNF. Other regulatory agencies will be involved during the construction phase, and this has not been specifically addressed within the Report (e.g., Ontario Ministry of Labour, etc.). It is suggested that the Report clarify the		
		specific role the CNSC would fulfill throughout the Project lifecycle and the Report should also include the addition of other applicable regulatory agencies that would fulfill other roles during the different phases of the Project.		
14	Theme: Police and Public Safety	(a) Interviews with law enforcement (e.g., OPP,) are noticeably absent from the Report. These groups will be paramount as the first on-site public first responders for	(a) As discussed above (see comment #1), no additional interviews will be held at this point in the process. Additionally, although the assessment of larger transportation	(a), (b), (c), and (e) OPP and the RCMP now appear at a high level in the Revised Draft Report. This will be an area requiring additional consultation to define the Project

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	2.2.1 Knowledge Holder Interviews (a)  3.1 Federal Level (b)  3.2.5 OPP (c)  4.2 Operations Phase (d)  5 Preliminary Analysis (e)	physical threats, theft, traffic accidents, accidents involving UNF container shipments, coordination and implementation of community exclusion zones and evacuations (it should be noted that this is not an exhaustive list). Additionally, OPP and or RCMP have specific jurisdictional authority for chemical, biological, radiological, nuclear, and explosive (CBRNE) events and have teams and supporting resources that should be relevant to this Study.  (b) RCMP is not included in 3.1.  (c) This section does not outline what services will be provided by the OPP. It is	route beyond emergency services study area is not part of this assessment, the OPP's roles and responsibilities within the study as described in PNERP are discussed in the report.  (b) The RCMP will be added to section 3.1 and justification for excluding it from further discussion will be provided.  (c) We will include the roles and responsibilities of OPP as mentioned in PNERP and the mandates of OPP during emergencies.  (d) The law enforcement and security-related events involving radioactive	security response needs if South Bruce is the host municipality for it. Review comments were addressed satisfactorily.  (d) It is the PRT's opinion that security elements are missing from Table 3-2. We strongly suggest that security threats be added as a potential emergency with police as the potential emergency service for the following activity:  - Surface facilities to receive, handle, process, and temporarily store of used nuclear fuel  It may be beneficial to change the activity "Security fencing and access gates" to "Physical Security" to better describe the activity.
	Analysis (e)	suggested that the inclusion of all security response elements and CBRNE program elements be elaborated on in this section of the Report.  (https://www.opp.ca/index.php?id=115&lng=en&entryid=572769db8f94ac7e408a7252)	materials will be included in listing of characteristics/ activities that are specific to the operations phase. This will include information provided in the Deep Geological Repository Conceptual Design Report. Section 5.1 of the report does state the DGR Section 8.1 information.	Peer review comment remains outstanding following the review of V3 of the report.
		(d) The listing of characteristics/ activities that are specific to the operations phase is missing law enforcement and security-related events involving radioactive materials. Security-related events may include, but are not limited to, theft, acts of mischief, and terrorism. Security is major element of the EM program at Bruce Nuclear and also part of the mandate of the CNSC. Additionally, resources are listed in the Deep Geological Repository Conceptual Design Report in Section 8.1 (as referenced in Appendix C of the Report)  It is suggested that the addition of law enforcement and security-related events be added to the Study.	(e) Law enforcement and security capabilities will be included in this list.	

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		(e) Law enforcement and security capabilities are not included in this list. The federal section does not even mention the RCMP. The provincial section should be updated to add in the Project scope that will be relying on OPP services.		
15	Theme: Role and Authority of OFMEM 3.2.1 Emergency Management Ontario (now the Office of the Ontario Fire Marshal and Emergency Management (OFMEM)	(a) This section is missing the requirements under the Emergency Management and Civil Protection Act as it relates to municipal emergency management assessment and preparedness (e.g., Hazard Identification and Risk Assessment [HIRA], the implementation of plans, etc.). Every municipality, including South Bruce, must comply with these requirements. This is also misrepresented in the County Section.  (b) From the Emergency Management and Civil Protection Act:  3(1) Every municipality shall formulate an emergency plan governing the provision of necessary services during an emergency and the procedures under and the manner in which employees of the municipality and other persons will respond to the emergency and the council of the municipality shall by by-law adopt the emergency plan.  5.1(2) (2) In developing an emergency management program, every minister of the Crown and every designated agency, board, commission and other branch of government shall identify and assess the various hazards and risks to public safety that could give rise to emergencies and identify the facilities and other elements of the infrastructure for which the minister or agency, board, commission or branch is responsible that are at risk of being affected by emergencies.	(a) We have mentioned in the report (Section 3.4 and 5.5) that MSB has conducted HIRA that will need to be revised with consideration of the proposed Project.  (b) We will include the requirements of the EMCP Act in the revised report and update the text.	(a) and (b) Content has been updated in the Revised Draft Report. Review comment was addressed successfully.

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
16	Theme: Emergency Planning Zones  3.2.2 PNERP and 1.3.2 Spatial Boundaries	(a) The emergency planning zones used in this Study do not match what is in Provincial Nuclear Emergency Response Plan (PNERP).  (b) It is understood that the planning zones used in the PNERP are defined for nuclear reactor facilities, but it is not evident as to the sufficient justification on why 5 kilometres (km) was used for the study.  (c) Are there current standards for operating facilities that can be referenced?  (d) Has this been defined in the new CSA standard?  (e) It is highly recommended that the above be investigated and either given a supporting argument that will stand-up to regulatory and public scrutiny, or the zone be extended to the PNERP requirements for reactor facilities as a worst-case.	<ul> <li>(a) The 5-km emergency planning zone was provided by NWMO and their justification was provided in this report. We have mentioned that during preparation of PNERP implementation plan and the project emergency response plan, this zone may change.</li> <li>(b) Please note that the emergency planning zone(s) were also included in PNERP implementation plan for other nuclear facilities (non-reactor). This was discussed in the report. The revised report will also reflect additional information on the EPZ from the final <i>Land Use Study</i> report (MHBC/DPRA May 2022; e.g., updated Figures 2 and 10 showing EPZ and potential Project Site; e.g., updated /additional information in S. 1.3.2.2).</li> <li>(c) There is no standard for emergency planning zone for similar facilities. It should be developed during preparation of emergency response plans and PNERP implementation plan following site selection, as suggested in this report.</li> <li>(d) The new CSA standard does not have specific guidance for emergency planning zone.</li> <li>(e) Please see the first two paragraphs in this row. It is our understanding that the community studies are not subject to regulatory review.</li> </ul>	(a), (b), (c), and (d) Position acknowledged.
17	Theme: Other Nuclear Facility Resources 5.7 Industry	It should be noted that Bruce Power is not the only facility that can be considered as a model for how the NWMO and the DGR facility will integrate with the community. The Canadian Nuclear Laboratories has two facilities in Canada (Chalk River	Consideration of the experience from Chalk River and Whiteshell (being decommissioned) is beyond the scope of the community study. Additionally, these facilities cannot support the emergency services to the proposed Project. These	It is the PRT's opinion that this comment has not been adequately addressed in the Revised Draft Report. The only facilities listed include Bruce Power, the Compass Minerals Goderich Salt Mine, and the Kinectrics Laundry Facility. Although the

Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
	Section 6 Option 1 (as currently numbered)	Laboratories in Ontario and Whiteshell Laboratories in Manitoba), which also have operations that could result in a radiologically contaminated injured person(s), have agreements in place, and have provided equipment to their local hospitals and other local emergency services. It is recommended that the Report include these other facilities, in addition to Bruce Power in the Report to provide a more comprehensive understanding of how other facilities have integrated with the respective community.	other facilities could be considered as part of future studies related to emergency services, if the Project is located in the South Bruce Area.	PRT agrees that speaking with other facilities located outside of the Study Area (e.g., Chalk River, Whiteshell, etc.) is out of scope for execution of this Study, we still recommend that the NWMO can (and should) learn from other nuclear facilities and not just the local facilities.  Limiting the NWMO's future investigations on how to integrate a nuclear facility with local emergency responders to only the nuclear facilities in the immediate vicinity of the MSB is going to most likely limit the potential for good ideas coming from the experience of other nuclear facilities. The recommendation for the NWMO to talk to other nuclear facilities when determining how best to integrate facility emergency requirements with the municipality emergency responders is important. Chalk River is an excellent example of a non-reactor facility, which has an integrated emergency response program with the local community, that the NWMO could learn from when creating their new program. The PRT suggests that the Study include a recommendation that the NWMO will review how other Ontario/Canadian non-reactor facilities (such as Chalk River) implement emergency responses that are integrated with the community.  Peer review comment remains outstanding following the review of V3 of the report.
18. <sup>3</sup>	2.3 Assessment	Within bullet one, we believe that radiological response capabilities are missing from this list. We suggest that this be added.		Peer review comment remains outstanding following the review of V3 of the report.
19 <sup>3</sup>	4.6.1 Bruce Power	This section is missing the industry working group and agreements (MEAA/MOU/MAA/?) between nuclear		Peer review comment remains outstanding following the review of V3 of the report.

<sup>&</sup>lt;sup>3</sup> Comments 18-22 arose during subsequent reviews of revised CS Reports. To be discussed with DPRA/IEC.

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Comment Number	Report Section Reference	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Responses to DPRA Comments
		facilities to support each other during emergencies. This was discussed during the knowledge holder interview with Bruce Power.		
203	5.3.4 Workplace Safety North	We believe that the first sentence may be misleading and may be interpreted by a reader that WSN is completing mine rescue operations. We suggest that this be clarified by adding the words "regulatory oversight and resources" between "for" and "mine".		Peer review comment remains outstanding following the review of V3 of the report.
21.4	Options Assessment	The many options in this section are constructed with the public emergency service or agency listed with the primary responsibility to initiate and complete the suggested action and none of the options outline what the intent is for funding or taking on these potential implementations. Is this the intent of the report or should NWMO (leadership/ support/ responsibility) be added to change this interpretation?		Peer review comment remains outstanding following the review of V3 of the report.
224	Table 6 1: Assessment of the Options	<ul> <li>(a) We suggest that the following Options be revaluated as they pertain to the ease of implementation/degree of complexity, as we believe some of the options will have greater complexities than are being documented.</li> <li>4 Bruce County Engagement and information sharing with: b.WSN (WSN does not have any radiological elements in their current handbook and are not regulating any mines with radiological hazards)</li> <li>6. Updating Bruce County ERP (this will include a number of new hazards and capabilities and the obligations of the host municipality)</li> </ul>		Peer review comment remains outstanding following the review of V3 of the report.

<sup>&</sup>lt;sup>4</sup> Comments 18-22 arose during subsequent reviews of revised CS Reports. To be discussed with DPRA/IEC.

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Comment	Report Section	Comments from Peer Review	How and Where Comments are	Peer Review Responses to DPRA
Number	Reference		Addressed	Comments
		(b) We suggest that Bruce Power and Kinectrics Laundry be removed from 10 a. as they do not have any mine safety or rescue experience.		

Table 2 Assessment of the study work plan - Table 1. Emergency Services Study Approach

Step#	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
Step 1	Data Collection  -Secondary/ Primary; updated Project assumptions; information from other related community studies	a. Carry out a review of relevant emergency services reports and data sets (e.g., local and regional emergency response plans, service-specific emergency response plans, NWMO's emergency response plans)  b. Undertake interviews with key knowledge holders	a. Partially complete b. Completed, but the interviews conducted may be deficient due to missing information and insistencies. It is strongly recommended that these be addressed prior to finalizing the Study (supporting comments provide in the Disposition table)	See responses to PRT comments in Table 1 (Appendix C).	The addition of the language within the Revised Draft Report successfully addressed the review comment by indicating that NWMO will need to conduct additional studies during the pre-construction phase to identify and characterize potential Project emergencies (including underground emergencies) and develop additional detail regarding the specific circumstances that Project emergency services will be needed for:  - on-site/off-site construction and operations activities  - mine rescue (construction and operations phases)  - off-site transportation of UNF and on-site UNF handling (operations phase)
Step 2	Provide Inputs to and take Outputs from Other Studies	<ul> <li>a. Share data and findings with other community studies</li> <li>b. Take into considerations data and findings from other studies that are pertinent to the subject study</li> </ul>	a. Unknown and may be N/A     b. Partially complete, key     information not included in     this Study	Agreed there is some crossover/linkage with Land Use study only. The Land Use draft V1 (Mar 11) preceded Emergency Services draft V1 (March17), though there was sharing of information. This will be more fulsomely addressed in the revised V2 of ESS. In addition, the Local Traffic Study (Morrison Hershfield, July 2022) will be reviewed to see if there is information that can contribute to the revised report.	The Revised Draft Report included updated content from other relevant studies. Review comment was addressed successfully.
Step 3	Analysis and assessment, identification of effects	Based on review of reports/data sets and knowledge holder interviews, describe the services currently offered:	Partially complete     (supporting comments     provided in the Disposition     table)	See responses to PRT comments in Table 1 (Appendix C).	The additional text in the Revised Draft Report successfully addressed the review comment by indicating that NWMO will need to conduct additional studies during



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Step # Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
management options	<ul> <li>Nuclear Emergency Response capability</li> <li>Fire response capability of MSB</li> <li>Paramedic, Ambulance, and Air Ambulance capability of Bruce County</li> <li>Hospital services in proximity to the potential nuclear site</li> <li>Based on review of reports/data sets and knowledge holder interviews, describe:         <ul> <li>The NWMO's proposed internal conventional emergency services including contractor performed emergency services during construction</li> <li>The NWMO mine safety and rescue emergency services and other collaborating parties</li> </ul> </li> <li>Based on the analyzed findings, identify and describe options for emergency services during the construction and operations phases (e.g., mutual aid arrangements)</li> <li>Based on the analyzed findings and the options identified in Step 3c. above, describe the potential changes to the nuclear emergency response capability that may occur during the operations period</li> </ul>	<ul> <li>b. Partially complete (supporting comments provided in the Disposition table)</li> <li>c. Partially complete (supporting comments provided in the Disposition table)</li> <li>d. Partially complete (supporting comments provided in the Disposition table)</li> <li>e. Not mentioned in the Study</li> </ul>	With respect to 'e' "Based on the proposed Project emergency services options and the potential changes to nuclear emergency response, identify options for proposed long-term monitoring programs required": This is more appropriately done as part of future studies, if the Project is located in the South Bruce Area.	the pre-construction phase to identify and characterize potential Project emergencies (including underground emergencies) and develop additional detail regarding the specific circumstances that Project emergency services will be needed for:  - on-site/off-site construction and operations activities  - mine rescue (construction and operations phases)  - off-site transportation of UNF and on-site UNF handling (operations phase)

Step#	Step	Description of Activities	Comments from Peer Review	How and Where Comments are Addressed	Peer Review Initial Feedback to DPRA Comments
		e. Based on the proposed Project emergency services options and the potential changes to nuclear emergency response, identify options for proposed long- term monitoring programs required			
Step 4	Observations and Conclusions	a. Summarize findings     b. Set out observations and conclusions	a. Partially complete (supporting comments provided in the Disposition table)  b. Partially complete (supporting comments provided in the Disposition table)	See responses to PRT comments in Table 1 (Appendix C).	The content has been updated in the Revised Draft Report to summarize findings, set out observations and conclusions, and to identify future studies and planning needed. Review comment was addressed successfully.

# Appendix D

**36 Guiding Principles** 

#### South Bruce Guiding Principles for NWMO's Site **Selection Process**

The Nuclear Waste Management Organization (NWMO) is seeking an informed and willing host for a deep geologic repository (DGR) to safely store Canada's used nuclear fuel, and a Centre for Expertise. To guide its work, South Bruce held a comprehensive visioning process in 2019 and 2020 to get input on what people cared about most in relation to the Project. The process, in addition to other community input and feedback resulted in the creation of 36 Guiding Principles which focus on safety for people and the environment, ensuring the Project brings meaningful benefits to the community, and ensuring the municipality has a voice in decision-making.

The principles were adopted by Council resolution and they have guided municipal activities and engagement related to the Project. South Bruce is seeking NWMO commitments on how it would meet or address these 36 expectations and aspirations for the Project. This is a key step in determining whether the Project is right for the community and will help people make an informed decision when a public referendum is held to measure willingness to be a host community.

# Safety and the Natural Environment



- 1. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will be subject to the highest standards of safety across its lifespan of construction, operation and into the distant future.
- 2. The NWMO must demonstrate to the satisfaction of the Municipality that sufficient measures will be in place to ensure the natural environment will be protected, including the community's precious waters, land and air, throughout the Project's lifespan of construction, operation and into the distant future.
- 3. The NWMO must demonstrate to the satisfaction of the Municipality that used nuclear fuel can be safely and securely transported to the repository site.
- 4. The NWMO will ensure that the repository site will not host any nuclear waste generated by other countries.

- 5. The NWMO must commit to implementing the Project in a manner consistent with the unique natural and agricultural character of the community of South Bruce.
- 6. The NWMO will minimize the footprint of the repository's surface facilities to the extent it is possible to do so and ensure that public access to the Teeswater River is maintained, subject to meeting regulatory requirements for the repository.
- 7. The NWMO must commit to preparing construction management and operation plans that detail the measures the NWMO will implement to mitigate the impacts of construction and operation of the Project.

# People, Community and Culture



- 8. The NWMO must demonstrate to the satisfaction of the Municipality that it has built broad support for the Project within the community of South Bruce.
- 9. The Municipality will, in collaboration with community members, develop and establish an open and transparent process that will allow the community to express its level of willingness to host the Project.
- 10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.
- 11. The NWMO, in consultation with the Municipality, will establish a property value protection program to compensate property owners in the event that property values are adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
- 12. The NWMO, in consultation with the Municipality, will establish a program to mitigate losses to business owners in the event that their business is adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
- 13. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote the agriculture of South Bruce and the surrounding communities.
- 14. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote tourism in South Bruce and the surrounding communities.

- 15. The NWMO, in partnership with the Municipality, will commit to implement programs to engage with and provide opportunities for youth in the community, including investments in education and the provision of scholarships, bursaries and other incentives for youth to remain in or return to the community.
- 16. The NWMO will implement the Project in a manner that promotes diversity, equality and inclusion.
- 17. The Municipality recognizes the important historic and contemporary roles Indigenous peoples have and continue to play in the stewardship of the lands we all call home and will, in the spirit of Reconciliation, work with the NWMO and local Indigenous peoples to build mutually respectful relationships regarding the Project.
- 18. The NWMO will commit to relocate the working location of a majority of its employees to South Bruce as soon as it is reasonably practicable to do so after the completion of the site selection process.
- 19. The NWMO will, in consultation with the Municipality, establish a Centre of Expertise at a location within South Bruce to be developed in conjunction with the Project.

#### **Economics and Finance**



- 20. The NWMO, in consultation with the Municipality, will commit to implementing a local employment and training strategy with the objective of ensuring that the majority of employees for the Project are located within South Bruce and surrounding communities.
- 21. The NWMO, in consultation with the Municipality, will commit to implementing a business opportunities strategy that will provide opportunities for qualified local businesses to secure agreements that support the Project and that requires the NWMO to take all reasonable steps to create opportunities for qualified local businesses to benefit from the Project.
- 22. The NWMO will commit to implementing a procurement strategy for the Project that gives preference to the selection of suppliers who can demonstrate economic benefit to South Bruce and surrounding communities.
- 23. The NWMO will enter into an agreement with the Municipality providing for community benefit payments to the Municipality.

### Capacity Building [0]



- 24. The NWMO will cover the costs incurred by the Municipality in assessing community well-being and willingness to host the Project.
- 25. The NWMO will fund the engagement of subject matter experts by the Municipality to undertake peer reviews of Project reports and independent assessments of the Project's potential impacts on and benefits for the community as determined necessary by the Municipality.

- 26. The NWMO agrees to cover the costs of the Municipality's preparation for and participation in the Project's regulatory approval processes, including the Canadian Nuclear Safety Commission's licencing process and the assessment of the Project under the Impact Assessment Act (or other similar legislation), that are not otherwise covered by available participant funding.
- 27. The NWMO will fund the Municipality's preparation of a housing plan to ensure that the residents of South Bruce have access to a sufficient supply of safe, secure, affordable and well-maintained homes.

#### Services and Infrastructure



- 28. The NWMO will prepare a review of the existing emergency services in South Bruce and provide appropriate funding for any additional emergency services required to host the Project in South Bruce.
- 29. The NWMO will prepare an infrastructure strategy that addresses any municipal infrastructure requirements for the Project and will commit to providing appropriate funding for any required upgrades to municipal infrastructure required to host the Project in South Bruce.
- 30. The NWMO will prepare a review of the existing and projected capacity of South Bruce's road network and will commit to providing appropriate funding for any required upgrades to the road network.
- 31. The NWMO will enter into a road use agreement with the Municipality that identifies approved transportation routes during construction and operation of the Project and ensures proper funding for maintenance and repair of municipal roads and bridges used for the Project.

# Services and Infrastructure (continued)

- 32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.
- 33. The NWMO will comply with the Municipal Official Plan and zoning by-law and seek amendments to the Official Plan and zoning by-law as necessary to implement the Project.

# Regional Benefits +

36. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will benefit the broader region outside of the community of South Bruce, including local Indigenous communities.



#### **Governance and Community Engagement**

- 34. The NWMO will provide the Municipality with an ongoing and active role in the governance of the Project during the construction and operation phases of the Project.
- 35. The NWMO will continue to engage with community members and key stakeholders to gather input on community vision, expectations and principles, including concerns, related to the Project.

Reach out anytime with your questions, comments, concerns, or if you are seeking more information. We would be happy to hear from you!

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Visit our website: www.southbruce.ca

Visit our community engagement tool: www.southbruceswitchboard.ca

Sign up to get Project updates direct to your inbox: <a href="mailto:forms.southbruce.ca/Stay-Connected">forms.southbruce.ca/Stay-Connected</a>

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