Oral Supplementary To CMD 09-H2.5 Re Beaverlodge Mine/Mill Site Waste Facility Licence.
Commissioners of the Canadian Nuclear Safety Commission.

The emergence of radium and its radioactivity arising from the sediments in the various lakes of the Beaverlodge area is a vexing problem.

In the Cameco document (CMD 09-H2.1, pp. I, 3) the staff attempted to brush off the problem of radioactivity as of little risk or danger. The CNSC staff did not agree. It requested that Cameco produce additional data regarding (a) the lack of radiological risk to humans; and (b) the radiological risk to non-human biota; and (c) the omission of a "Risk Radiation Options Analysis." (CNSC-CMD 09-H2, pp. 2,5,6)

Has the CNSC received such substantial data? I think not! It has received a wish list of 12 items of potential actions from a series of consultations. (CNSC-CMD-H.2.c,p.12) These are still a list of hypothetical measures, with a range of options or possibilities from "do nothing" to reprocess, dredge, excavate, or remove and relocate. There are no commitments to real action after all this time! There are no "milestones and expected results of planned activities" as specified in the CNSC Record of Proceedings, Feb. 15,/09, pp.4,8, or the CMD 09-H.2 C, pp. 4,8)

In the CNSC Public Hearing at Saskatoon on Sept. 18, 2008, I attached to my intervention a statement by Dr. Gordon Edwards, concerning the risks and dangers of radium involved in the tailings of the JEB pit. Commissioner McDill noticed the item, and asked the CNSC staff for clarification. You can read the exchange on pp. 84-86 of the Transcript, CNSC Public Hearing, Sept.18, 2008.

Mr. Kevin Scissons responded that he thought there had been a typographical error, and that one number was overstated. He said there would be a technical review with staff in Ottawa, and the correct information would be sent to Dr. Edwards and Dr. Adamson.

Over a year later, nothing has been heard from Mr. Scissons. I think that neither he nor his staff thoroughly understand the complexity and risks of radium and radioactivity involved in the care and treatment of uranium tailings. The radium and its radioactivity keeps emerging from the lake sediments, and is expected to continue increasing for the next 25-30 years.

I am not a chemist or a physicist, but I can read. I can read the various reports and read between the lines. There are frequent references to fancy words like "mitigation" and "remedial action," but as far as selenium and radium contamination is concerned, I do not believe that the Cameco staff or the CNSC staff know what the hell to do about them! They just keep describing the problem and measuring the problem, but have no real solution. They also ignore the toxicity problem, and statements of people like Dr. Gordon Edwards, who reminds us that one milligram of radium is enough to overdose 10,000 humans!

Thank you.

Bill Adamson,
Saskatoon, Sask.
Nov. 5, 2009