

June 1, 2020

Ms. Rumina Velshi, President and CEO  
Canadian Nuclear Safety Commission  
280 Slater Street, Ottawa K1P 5S9

CMD 20-H102

Dear President Velshi:

Re: Scope of the Environmental Assessment of Global First Power's proposed Micro-Modular Reactor at Chalk River, Ontario

The undersigned 22 public interest and community groups are writing to express our concern about the scoping approach to the Environmental Assessment (EA) of Global First Power's (GFP) proposed Micro-Modular Reactor (MMR) at Chalk River, Ontario set out by CNSC staff in CMD 20-H102.

On January 27<sup>th</sup>, 2020 the Canadian Nuclear Safety Commission (CNSC) issued a notice that they would be making a decision on the proposed scope of factors to be considered in the conduct of an environmental assessment (EA) for a project proposed by Global First Power (GFP). The decision will be based on written submissions to the Commission.

Several of the undersigned groups commented on the Project Description by the deadline of September 14<sup>th</sup> 2019. A Disposition Table of Public and Indigenous Groups' and Organizations' Comments on the Project Description for the Micro Modular Reactor Project now appears on the Impact Assessment Registry with a posting date of 28 April 2020. However, there appears to be no opportunity to reply to the CNSC staff interpretation or dispositioning of our comments. As the notice clearly indicates, the written intervention opportunity is to seek comments on the "scope of the EA for GFP's proposed MMR Project".

### **Recommendations on Scope of EA**

We have numerous concerns with the proposed scope of the EA. As currently drafted, it fails to meet the principles and purposes of environmental assessment, as set out in the *Canadian Environmental Assessment Act, 2012* and accompanying guidance. It also fails to adequately detail how the factors to be considered in conducting an EA will be interpreted and applied to this designated project.

We are requesting that the following amendments be made:

- The EA should include a full examination of the purpose of the project, as well as alternatives to the project, and alternative means of carrying out the project; the scoping document either fails to set out these requirements, or does so inadequately
- The EA must include a full examination of environmental factors and environmental effects at each stage of the project (fuel fabrication and transport of materials, site preparation and construction, operation, decommissioning and abandonment, transport and storage of waste including long and very long term management of the wastes in such a way as to isolate them from the natural and human environment); the current scoping document does not set this out in sufficient breadth or detail

- The EA must include a full examination of the cumulative effects at each stage of the project (fuel fabrication and transport of materials, site preparation and construction, operation, decommissioning and abandonment, transport and storage of waste including long and very long term management of the wastes in such a way as to isolate them from the natural and human environment) and of the cumulative effects of this project and other projects and activities sharing the environment, such as the many other nuclear projects and radioactive wastes and sites contaminated by radioactivity at the Chalk River site; the current scoping document does not set this out in sufficient breadth or detail
- The EA must include a full examination of the effects of malfunctions or accidents that may occur in connection with the designated project at each stage of the project (fuel fabrication and transport of materials, s
- ite preparation and construction, operation, decommissioning and abandonment, transport and storage of waste including long and very long term management of the wastes in such a way as to isolate them from the natural and human environment); the current scoping document does not set this out in sufficient breadth or detail
- The EA must set out clearly how followup programs will be carried out and how monitoring will be carried out, and how the followup programs including monitoring results will be used to determine if EA predictions are being met and if mitigation measures have been sufficient or additional mitigation or project cessation are required; the current scoping document does not set this out in sufficient breadth or detail

Crucially, with respect to the scope of this EA, the environmental assessment undertaken for the proposed MMR at Chalk River cannot in any way be construed or allowed to serve in any manner as an EA for any future projects by Global First Power or for projects which may be brought forward by any of the multiple potential proponents of “small modular” or “advanced” reactors. Reactors proposed for other locations, including remote or northern communities or resource extraction sites or large industrial projects, must undergo a complete and full environmental assessment that takes into full account the unique features of the proposed reactor design, all stages of the project, and the unique location for which the project is being proposed.

In closing, we request that:

- The CNSC extend the comment period to allow adequate public participation, as per the request submitted by the Canadian Environmental Law Association (CELA) on April 8<sup>th</sup>, 2020 and reconsider its Record of Proceeding rejecting this request dated April 27
- The Commission direct the CNSC staff to revise the proposed scoping approach to address the concerns raised and the recommendations made in this joint letter
- The Commission accept this joint letter as the signing groups' endorsement and adoption of the submissions of CELA and Dr. M.V. Ramana

Thank you for your attention.

The undersigned 22 organizations:

Mike Wilton, Algonquin Eco Watch, Spring Bay Ontario  
Kevin Kamps, Beyond Nuclear, Takoma Park, Maryland, U.S.A.  
Ziggy Kleinau, Bruce Peninsula Environmental Group, Hamilton, Ontario  
Dr. Cathy Vakil, Canadian Association of Physicians for the Environment, Toronto, Ontario  
Dr. Gordon Edwards, Canadian Coalition for Nuclear Responsibility, Montreal, Quebec  
Peter Harris, CARN (Citizens Against Radioactive Neighbourhoods), Peterborough, Ontario  
Eva Schacherl, Coalition Against Nuclear Dumps on the Ottawa River (CANDOR), Ottawa, Ontario  
Dr. Susan O'Donnell, Coalition for Responsible Energy Development in New Brunswick, Rothesay, New Brunswick  
Dave Taylor, Concerned Citizens of Manitoba, Winnipeg, Manitoba  
Jo Hayward-Haines, Council of Canadians - Peterborough, Peterborough, Ontario  
Ann McAllister, Council of Canadians - Saint John Chapter, Rothesay, New Brunswick  
Don Ross, County Sustainability Group, Prince Edward County, Ontario  
Dodie LeGassick, Environment North, Thunder Bay, Ontario  
Jeremy Milloy, Justice, Peace, and Integrity of Creation Office of the Sisters of Providence of St. Vincent de Paul, Kingston, Ontario  
Patricia Leson, National Council of Women of Canada, Ottawa, Ontario  
Debra Sullivan, North Bay Peace Alliance, North Bay, Ontario  
Brennain Lloyd, Northwatch, Northeastern Ontario, Ontario  
Johanna Echlin, Old Fort William Cottagers' Association, Sheenboro, Quebec  
Angela Bischoff, Ontario Clean Air Alliance, Toronto, Ontario  
Faye More, Port Hope Community Health Concerns Committee, Port Hope, Ontario  
Dr. Meg Sears, Prevent Cancer Now, Ottawa, Ontario  
Samuel Arnold, Sustainable Energy Group, Woodstock, New Brunswick