



**Written submission from
Organization of Canadian
Nuclear Industries**

**Mémoire de
Organization of Canadian
Nuclear Industries**

In the Matter of

À l'égard de

**Decision on the scope of an environmental
assessment of the proposed Micro Modular
Reactor Project at the Canadian Nuclear
Laboratories Ltd., in Chalk River**

**Décision sur la portée de l'évaluation
environnementale pour le projet de
microréacteur modulaire aux Laboratoires
Nucléaires Canadiens Ltée, à Chalk River**

Hearing in writing based on written
submissions

Audience par écrit fondée sur des mémoires

June 2020

Juin 2020

May 26, 2020

Tribunal Officer, Secretariat

Email: cnscc.interventions.ccsn@canada.ca

Ref. 2020-H-102

GFP MMR Project at Chalk River Laboratories Site (CRL)
Scope of Factors to be considered in the EA under CEAA 2012

Dear Tribunal Officer

On behalf of the Organization of Canadian Nuclear Industries (OCNI) I am intervening to support the CNSC Staff recommendation to the Commission (in their commission member document (CMD)) that the EA Scope for the Global First Power MMR Project at CRL remain as defined below with no additional requirements:

- Atmospheric effects assessment (including noise and light)
- Physical and cultural heritage assessment (including archeology)
- Hydrogeological and geological assessment of the site (including seismicity)
- Surface water assessment
- Socio-economic assessment (including sustainability)
- Stakeholder and Indigenous Engagement
- Traffic and transportation study
- Terrestrial and aquatic studies
- Alternative means of carrying out the project (including site selection)
- Indigenous knowledge
- Health- Human Assessment
- Ecological Risk Assessment
- Nuclear Waste Management

The GFP MMR Project at CRL is the first regulatory licence application in support of the deployment of a small modular reactor (SMR) in Canada as well as the first SMR project to commence an Environmental Assessment in Canada. As the first SMR project to commence an EA it is important that the process be well-defined, thorough, and predictable. In our view the above list of factors to be considered in the EA is very comprehensive. Adding further EA scope would, in our view, not provide additional protection to the public and the environment but could introduce delays and uncertainties in the review process.

Canada has an opportunity to become a leader in the deployment of SMR technologies which will provide a variety of benefits to remote and Indigenous communities suffering from energy poverty. A thorough and efficient EA Review of this project will encourage other SMR developers to invest in Canada – with attendant local benefits while paving the way for low-carbon sustainable energy future for the planet.

GFP is bringing the proven USNC MMR technology to the CRL Project (and to Canada) with an experienced nuclear operations partner in OPG. The timely EA review and licensing of the GFP MMR project will ensure that Canada becomes as a world-leading SMR Centre of excellence.

OCNI is an industry trade association of more than 230 leading Canadian suppliers to the nuclear industry in Canada and offshore. OCNI companies employ more than 15,000 highly skilled and specialized people who manufacture major equipment and components and provide engineering services and support for the 22 CANDU nuclear power plants that have been constructed in Canada as well as for CANDU and LWR nuclear power plants in offshore markets. OCNI members are also poised to supply components to SMR units constructed in Canada and around the world.

In conclusion, OCNI strongly recommends that the EA Scope for the Global First Power MMR Project at CRL remain as defined above with no additional requirements:

Yours sincerely



Dr. Ron Oberth
President and CEO