



**Written submission from the
Old Fort William Cottagers'
Association**

**Mémoire de
Old Fort William Cottagers'
Association**

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

Johanna Echlin
Old Fort William Cottagers' Association
Sheenboro, Quebec

June 1, 2020

To: Canadian Nuclear Safety Commission
Sent by email: cncs.interventions.ccsn@canada.ca

Re: The scope of factors to be considered in the environmental assessment of Global First Power's Micro Modular Reactor proposed to be built at Chalk River Laboratories (Ref. #80182)

We thank you for this opportunity to comment on the scope of factors in the environmental assessment (EA) of Global First Power's (GFP) Micro Modular Reactor (MMR).

Old Fort William Cottagers' Association fully endorses the submission by the Canadian Environmental Law Association (CELA) and Dr. Ramana which evidences the importance of this issue and the need for thorough and detailed scoping details at this stage of the EA process. We are relying on those with more knowledge and expertise to bring to light the needed amendments due to our belief that the current scope of this environmental assessment is not adequate.

A 30-day extension was requested by CELA due to Covid-19 and this extension was denied as GFP indicated that such an extension would "introduce undue detriment to the MMR project." We believe that meaningful public participation has been undermined as some groups and individuals will be unable to provide detailed comments due to current circumstances. We support CELA's request for an extension or suspension of the current EA process.

Old Fort William Cottagers' Association (OFWCA) is a community of full-time residents and cottagers in Sheenboro, QC. Several of our members are just three kilometres downriver from CRL. What transpires at Chalk River and with this environmental assessment could have significant consequences to our community. We do not take this lightly.

We question the rationale for this entire project. SMRs will be much more expensive than alternative forms of energy (that are clean, renewable and do not produce radioactive waste). SMRs will take many years to develop and will not meaningfully contribute to the mitigation of climate change. Alternative forms of energy would provide power to remote areas faster and more cheaply without the risk of radioactive

contamination. As consideration of the **purpose of the project** is among the factors the CNSC must review, these are squarely the issues which should be required elements within the CNSC's decision on scope.

OFWCA submitted comments in August 2019 on Global First Power's Project Description (OFWCA/Echlin <https://registrydocumentsprd.blob.core.windows.net/commentsblob/project-80182/comment-22753/Aug 27 - Johanna Echlin.pdf>). We enumerated our many concerns regarding GFP's Project Description and the necessity of a comprehensive and rigorous environmental assessment and licensing process to protect citizens from long-term radioactive contamination of our lands and rivers.

GFP's MMR will be the very first SMR in Canada and the very first to undergo an environmental assessment. This is new, unproven and experimental technology and GFP's MMR will be situated very close to the Ottawa River. HTGRs, the technology that GFP is proposing, have a spotty safety record and are prone to failures that could potentially lead to serious accidents releasing radioactivity into the environment and contaminating the Ottawa River jeopardizing millions of Canadians living downstream. The use of enriched uranium raises concerns about international agreements, the potential risk of accidents with this fuel, proliferation risks, the necessity for increased security etc. Another issue is one hundred truck loads to be transported from the US to Chalk River (as stated in GFP's recent virtual townhall). The blatant lack of information in GFP's Project Description regarding the decommissioning of this SMR and the disposition of more radioactive waste at Chalk River is disturbing.

We noted on the 'Disposition table of public and Indigenous groups' and organizations' comments' (May 2020) that a number of concerns were "out of scope" or "beyond the mandate" of the CNSC. Troubling indeed.

Example 1 (p.30): As the intended purpose of building this SMR at CRL is to determine its commercial viability and GFP's expectation is to place these SMRs in different remote areas, we believe that the EA must include security and emergency scenarios not only at Chalk River but in numerous remote areas (where the support structure and expertise are not readily available) and should not be considered out of scope. If this is not part of the current EA then a separate environmental assessment must be required prior to the siting of GFP's future SMRs in other locations.

Example 2 (p.13): "Financial support and agreements, details of funding sources and commercial arrangements, such as those between GFP and AECL are not within the CNSC's mandate." We would like the funding for this \$100 - \$200 million (as stated by GFP in virtual townhall) project clarified. Will the federal government be funding any part of GFP's project? We want to be informed of the "financial support and agreements" especially if Canadian taxpayers are implicated.

Our expectation of a rigorous environmental assessment cannot be overstated. Public trust in the integrity of this EA process will depend on how robust this process will be.

The concerns mentioned here and the others addressed in our August 2019 comments are reasons for our endorsement of CELA's and Dr. Ramana's submission regarding scoping factors for this EA. We strongly urge the CNSC to consider all the recommendations proposed by CELA and Dr. Ramana as well as other organizations such as Concerned Citizens of Renfrew County and Area.

Please keep OFWCA informed of each step in the environmental assessment of GFP's MMR project.

Thank-you.

Sincerely yours,

Johanna Echlin