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Written submission from the Canadian Nuclear Association

In the Matter of

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

Hearing in writing based on written submissions

June 2020

Mémoire de l'Association nucléaire canadienne

À l'égard de

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

Audience par écrit fondée sur des mémoires

Juin 2020

Canada

canadian nuclear association cna anc association nucléaire canadienne

June 1, 2020

Canadian Nuclear Safety Commission
Tribunal Officer, Secretariat
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Intervention Regarding the Proposed Scope of Factors to be Considered in Conduct of an Environmental Assessment for a Project Propose by Global First Power.

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire lifecycle of the nuclear industry and as such are supportive of Global First Power's Micro Modular Reactor Project at Chalk River.

Nuclear energy is a safe, clean, and reliable source of energy that not only helps Canada meet its electricity needs but is also a critical element in achieving Canada's greenhouse gas emissions targets. If Canada and indeed the world is to meet the targets agreed to in the Paris Accord, nuclear power must play an increasingly important role.

The Global First Power (GFP) project is critical part of the development of new Micro Modular Reactors (MMR). GFP's project will demonstrate how MMRs can meet energy needs while helping achieve environmental and climate change goals; ultimately enabling the future success of other small modular reactors. GFP's proposed project will provide a critical model for the future by demonstrating how MMR technology can provide heavy industry (i.e. mining operations) and off-grid remote communities with low carbon, reliable energy that produces no GHG emissions and reduces dependency on fossil fuels.

Like all members of the CNA, GFP is strongly committed to ensuring the health and safety of the people living and working in the vicinity of the proposed project and to the protection of the surrounding environment. The CNA has spoken to GFP and knows that they are committed to a thorough, open, and transparent EA process and that they will undertake diligent studies and thoughtful Indigenous and public engagement in producing their Environmental Impact Statement.

The CNA understands that GFP's MMR projects is subject to an EA under the Canadian Environmental Assessment Act 2012 (CEAA 2012) with the CNSC as the sole responsible authority. As such, the EA is required to take into account the factors outlined in CEAA 2012 subsection 19 (1). After reviewing these factors, CNA agrees with CNSC staff's assessment that the scope of factors for the EA include the factors mandated in paragraphs 19 (1) (a) to (h) of CEAA 2012 and that no additional factors be included.

The CNA has reviewed GFP's Project Description and the CMD 20-H102 and would like to offer the following comments for the Commission's consideration:

- An important consideration of an EA is "determining alternative means of carrying out the project". In this case, the purpose of the MMR project is to demonstrate "alternative means" to using fossil fuels to provide safe, reliable, non-emitting energy for heavy industry and remote communities. A successful demonstration of this technology would have a significant environmental benefit by helping Canada (and the world) meet the GHG reduction targets set by the Paris Accord.

- The Chalk River site has been a fixture in the nuclear industry for 75 years and has hosted many nuclear projects. While the MMR EA decision will be made independently of historical activities on the site, GFP will be able to build on existing baseline studies and years of operating experience.

- The project may be built on previously disturbed area of the CRL site. Therefore, there is a low probability that there will be impacts on any physical or cultural heritage aspects that have not already been well studied and documented. As well, the CRL site has been well studied through previous EAs and potential areas of cultural heritage are well known.

- The particular reactor design proposed for the project does not require a source of cooling water (no intake or discharge of water) meaning there will be no or very little impact on the Ottawa River or surrounding natural water bodies.

- The majority of construction for the MMR will take place off site with only the assembly of major components taking place on site. Aside from the required excavation in the specific project area, there will be a shorter on-site construction period with less construction traffic therefore reducing the environmental impact.

The CNA is confident the studies and consultation activities that have been and will be carried out will clearly demonstrate that the MMR project can proceed safely and will protect the health and safety of the public and protect the environment.

In conclusion, the CNA believes that proposed EA scope for GFP's MMR project should be accepted as recommended.

Please feel free to contact me directly should you have questions or require additional information.

Sincerely,

John Gorman
President and CEO
Canadian Nuclear Association