



**Written submission from
Citizens Against Radioactive
Neighbourhoods (CARN) and Port
Hope Community Health Concerns
Committee (PHCHCC)**

**Mémoire de
Citizens Against Radioactive
Neighbourhoods (CARN) et Port
Hope Community Health Concerns
Committee (PHCHCC)**

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

From: [Peter Harris](#)
Sent: Monday, June 1, 2020 4:20 PM
To: [Interventions \(CNSC/CCSN\)](#)
Subject: CMD 20-H102 Intervention

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

We, Citizens Against Radioactive Neighbourhoods and Port Hope
Community Health Concerns Committee are writing to you out of
concern for the scope of the environmental assessment for Global
First Power's proposed Micro Modular Reactor at Chalk River, Ontario.
Please accept this submission as our intervention for this matter.

As you know from the recent BWXT relicensing hearings in
Peterborough, our communities have a vested interest in nuclear fuel
manufacture through the manufacturing facilities operated by Cameco
in Port Hope and BWXT in Peterborough.

You will also know that during the license hearing processes for
Peterborough and Port Hope, the CNSC did not consider the broader

implications of license approval and future manufacturing processes, nor did it ask the licensee to offer a business plan encompassing the term of its license.

More specifically, the manufacturing process involved in making fuel for Global First Power's reactor is radically different from that of a CANDU reactor. Moreover, it involves the use of enriched fuel sources - which the Peterborough Medical Officer of Health states is "much more likely to have a health impact than the natural uranium used in manufacturing processes in Peterborough"

Since the CNSC would not consider any "speculative" discussions of the health effects of enriched uranium or exotic manufacturing processes at the Peterborough or Port Hope facilities during license renewals, it is critical that the full implications of fuel manufacture be reviewed within the scope of the environmental assessment for the Chalk River reactor.

We recommend the following items be detailed within the EA in order to set out *how* the factors enumerated in section 19 of the Act will be fulfilled;

- buffer zones for adjacent communities in compliance with IAEA siting guidelines and health and safety considerations
- locations of other facilities related to the project for the duration of its lifecycle
- other site licenses, including environmental compliance approvals and other federal EAs that have been undertaken at the site and their social values of the community and their consideration within section 5 of the Act
- site security
- fuel and waste transportation safety
- waste storage and disposal
- cradle to grave costing
- emergency preparedness and costing
- comprehensive independent environmental monitoring
- the health and safety implications around the use of enriched uranium and not natural uranium
- the health and safety implications of novel fuel fabrication processes

We in Peterborough and Port Hope seek to understand how our communities may be affected by this proposal. We also seek to have the lessons learned through decades of experience applied to a proper and full environmental assessment. The difficult lessons learned in our communities should not be wasted.

An assessment that does not consider the full fuel cycle will not be an environmental assessment.

Sincerely,

Peter Harris For CARN (Citizens Against Radioactive Neighbourhoods)

Fay More for PHCHCC (Port Hope Community Health Concerns Committee)