



**Written submission from
Cathy Leonard**

**Mémoire de
Cathy Leonard**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

Sent by email interventions@cnsccsn.gc.ca

Cathy Leonard
Dufferin, NB

March 25, 2022

RE: Intervention (written submission for the NB Power License Renewal Application (Hearing Ref. 2022 - H - 02))

To whom it may concern:

I, Cathy Leonard of Dufferin, NB, am writing this letter as a written intervention in opposition to NB Power's application to renew its license for Point Lepreau Nuclear Generating Station for a period of 25 years, as well as objecting to the CNSC's recommendation for a 20-year license. I am not applying for oral intervenor status.

I am a child of this region, who has turned into a mother in this region and because of my long-term connection to this place, and my family's long-term connection to this place, I understand fully that change is constant. It is evident in everything from tidal action, to changes over recent years, including the effects of terrorism (9/11), the pandemic, and both global and localized environmental disasters - all of which affect my family. One of the most pressing concerns of the younger generations of my family, is climate change, and now, because of Russian aggression they have learned more about, and have raised fears about the safety of PLNGS.

I cannot condole them – regarding climate change, the science is clear: climate change is happening at a shocking and measurable rate, and the World Nuclear Industry Status Report 2020 indicates that **nuclear power “shows that it has a low resilience against the most common climate change effects”**.

With respect to additional safety risks of PLNGS, I can also provide no hope, because instead, I have to recall the 2017 re-licensing hearings of PLNGS, when I learned that the CNSC, even with a mandate for safety, is not prepared to be proactive, let alone – clean up its own mistakes. Case in point – the reassessment of PLNGS after the Fukushima disaster found that large release seismic capacity from the previous PSA-based SMA was overestimated at .42g and was now .35g. **This was below the safety goal limit of .4g and was not reported. The rational**

for this not being reported from NB Power is that they had requested that the CNSC Staff approve the change from .4g to .344g in their methodology and that the CNSC staff accepted this new safety limit and therefore no safety limit was exceeded. It is very concerning that NB Power and CNSC staff simply move the safety limit, so it is no longer exceeded. I cannot tell my children, their children, or my neighbours that CNSC is protecting our communities' health and safety.

Another example of why I do not believe the CNSC is able to protect our safety, is when during the 2017 hearings, intervenor Chris Rouse had asked for the hazard assessments specific to seismic risk be made publicly available, he noted this was a carry-over action item from the prior 2011 Point Lepreau hearing. As Mr. Rouse stated:

*These documents are not on NB Power's website, **despite the President's request to do so.** (Emphasis added)*

Addressing the lack of public availability of the assessment, then President Binder stated:

I'm just not buying it -- you don't have to disclose this software in the methodology but I'm sure you can release the results so, unless there is absolute things I don't understand, I don't see how a study of earth is confidential. Ever.

The CNSC has only one way to ensure the nuclear industry will follow the rules – do not grant a license until they do so. The nuclear industry boasts about its safety record, however, they are not the folks that we can trust, if they are not even willing to 'cross their T's and dot their I's regarding such small requests. **IT IS UNSAFE WHEN THE INDUSRTY IGNORES THE REGUALTOR.**

As well, I take issue with the decommissioning date. When PLNGS was being refurbished the timeline for decommissioning was always quoted as '25 – 30 years' life extension. However, somewhere over the intervening years this seems to have changes as, recently, I only ever hear the '30-year' reference. Even if we if we assume the new pressure tubes are good for 30 years, that takes us to 2042 (or earlier, depending on the date used – the beginning or end of the refurbishment), which would mean the reactor should be relicensed for no more than 20 years. NBP is asking for a license that would extend beyond this, and for other reasons noted above, I do not support the 20 year recommendation of CNSC staff either. CNSC states that the 20-year recommendation was a response to the specific request for 25 years. Instead, please consider the specific request for 1-3years – and respond to that.

The regulator must demand continued, regular review and scrutiny for PLNGS in at the maximum, 3-year increments. It has only been in the last 3 licensing periods that even 5-year

licenses have been approved, and NB Power has not yet proven they can handle this responsibility.

Having read the Preliminary Decommissioning Plan (PDP) for the PLNGS, I am shocked at how little real information is contained within. It reads more like a hypothesis than a strategy. The CNSC must not accept it. The projected completion date for the PDP, when we might be able to use the land safely is 2077. Let that sink in. 2077. And to be completely realistic (based on NBP's history with construction at the site), we can say with some level of confidence that it will take longer than that. We must start decommissioning within 3 – 6 years.

As well, although the CNSC does not deal with economics per se, commissioners must realize that nuclear is more of an 'ecosystem' than separate knowledge domains which can be managed separately. It must be acknowledged that the economics of PLNGS, therefore NBP, therefore the Province of NB is excessively interdependent with the ability for the province to provide for the health and safety of its citizens. There are links that cannot be ignored. The current estimates of cost for the decommissioning are estimated to be MUCH less than the refurbishment costs – how is this possible – even if we only consider 2 factors – 1> there will be way more work to do than during decommissioning and 2> there will be continual inflation during the 30+ years of decommissioning activities. I'm sure the commissioners are well aware the NB Auditor General pointed out that 3.6 billion of NBP's 4.9-billion-dollar debt is directly attributable to NBP's nuclear forays, this is unsustainable – please start decommissioning now. PLNGS is like a mortgage 'under water' and we cannot strangle our future generations with this. **There is no way I will ever be convinced that the economic health of our province, does not affect the cultural and mental health of our province's residents, and the CNSC should not operate as if it doesn't.**

A generation averages 25 years. Please do not make decisions with gross disregard to our children, our children's children and so on. We are placing upon them the debts of sickening magnitude and sicknesses related to a debt of toxic waste. I implore you to stop NBP from adding to the eternal mess that is growing daily. I call upon you to change the trajectory of our toxic waste legacy and **commit to doing the right thing for our environmental and personal health and safety.**

In the NBP comments on REGDOC-2.11.1 **we are assured that they do not have the health and safety of future generations in mind when on page 3, (#9 – section 4) they recommend that the REGDOC omits the words, "...avoid imposing an undue burden on future generations..."** I was further appalled to learn (not from the decommissioning report – but again from these comments (pg6, #13 section 6.1) that there ARE current plans to place IWL in aboveground mounds.

How can NBP and the CNSC demand more of our unborn children and of the First Nations whose territory this is? **The Passamaquoddy were never asked if they approved the**

build of PLNGS, there apparently will never be a trigger for an EIA which would legally require REAL consultation, and they have stated they don't want PLNGS. If we are bound as a society to Truth and Reconciliation – is NBP and CNSC just deciding it doesn't apply to PLNGS?

There are so many local people I speak to who have the same type of concerns, I hope they will all let you know that we want PLNGS decommissioned as soon as possible, and therefore only grant 3-year relicensing until that point.

Please consider how your mandate, and wider mandate which involves UNDRIP and Truth and Reconciliation will affect your decisions on the PLNGS license application.

Be Brave.

Cathy Leonard