

To:

Canadian Nuclear Safety Commission
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From: Dave Taylor, Spokesperson
Concerned Citizens of Manitoba

Please find submission regarding:

REGDOC-1.1.5

Licence Application Guide: Small Modular Reactor Facilities

Concerned Citizens of Manitoba have been active in the environmental movement in Manitoba for over 40 years. Our group has specifically looked at developments in the nuclear industry and have participated in a variety of hearings and assessments of the Whiteshell Nuclear Research Establishment and the Underground Research Laboratory near Pinawa, Manitoba. We are of the understanding that the WNRE is actively attempting to secure a prototype Small Modular Reactor.

The work of the Atomic Energy Control Board which gained some credibility under Dr. Agnes Bishop with their oversight of nuclear projects, has evolved into the Canadian Nuclear Safety Commission. The changes to this government body whose primary aim should be public safety, transparency and public participation appears to have lost it's way. It now advocates on behalf of the industry and has shrouded it's activities in secrecy. This has occurred In the same way Atomic Energy of Canada Limited has sub-contracted it's responsibilities to Canadian Nuclear Labs which has hidden it's activities behind a corporate proprietary wall.

The CNSC's "pre-licensing review of a vendor's reactor design," has been kept from public scrutiny through it's designation as proprietary. Concerned Citizens of Manitoba carefully scrutinized the activities of AECL and it's plan to break a fuel rod in the original Slowpoke Reactor. Our concerns were addressed by the AECB and this dangerous experiment was cancelled. We find it absurd that businesses intent on building SMR's should receive pre-licensing

assistance to expedite their designs through the Canadian assessment process. This is not within the mandate of the CNSC.

We recommend all reactor designs be subject to public scrutiny before licensing.

We also understand that under the proposed *Impact Assessment Act* legislation, SMRs currently do not trigger a federal environmental assessment. We also understand from a Greenpeace FOI request that CNSC is lobbying the federal government to make sure SMR's are exempt from assessment. Concerned Citizens of Manitoba find this the most egregious aspect of this proposed license as reactors produce extremely dangerous radioactive byproducts many with half-lives of thousands of years. In the interest of public safety we have the right to know and to have due diligence prevail in this unique proposal.

This license calls for the waste to be removed from the SMR's to a separate facility. Ironically there is no facility in Canada that has been approved to dispose of nuclear waste. The cart is again before the horse.

CNSC has clearly decided to advocate on behalf of various international corporate interests.

We recommend that any nuclear reactor built in Canada be subject to a thorough, transparent environmental assessment.

We also recommend that the Government of Canada review the activities of CNSC to ensure that their role is fulfilled as a protector of public safety.

Dave Taylor, Spokesperson
Concerned Citizens of Manitoba