

To: Canadian Nuclear Safety Commission
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From: Lisa Aitken, Concerned Citizen of Manitoba

The following written submission is in response to the Canadian Nuclear Safety Commission's (CNSC) "Licence Application Guide: Small Modular Reactor Facilities", Regulatory Document REGDOC – 1.1.5.

This draft regulatory guide is lacking in several critical areas, all of which jeopardize the primary function of CNSC, that being SAFETY, safety of the environment and safety of the public by doing due diligence.

Putting forth a regulatory application guide without public and Indigenous People consultation on the acceptance for Small Modular Reactors in Canada brings into question what is motivating this fast-track push for this "new generation" of the nuclear industry. The regulatory documents lack expectations for transparency and public participation. SMRs are a new technology and as a first step, they should be placed under a high level of scrutiny and have public input on whether they would be accepted in Canada. The first step should not be a licence application guide.

The regulatory document fails to address the long-term managing and storage of the radioactive waste produced by the SMRs. Although stated that it would be transported off site, Canada has no acceptable means of storing radioactive waste. Canadian's are living with the mistakes of the last 50 years when the Canadian government allowed nuclear reactors to be built with no achievable nor safe disposal for long term radioactive waste. A licence application guide should not be in place without a socially acceptable and environmentally safe radioactive waste storage plan.

Small Modular Reactors must be subject to an environmental assessment and stand up to the rigor and scrutiny of the public and expert review, thus enabling transparency, disclosure and public participation.