

To: [Consultation \(CNSC/CCSN\)](#)
Subject: RE: Canadian Nuclear Safety Commission's (CNSC) draft RegDoc-1.1.5 "Licence Application Guide: Small Modular Reactor Facilities"
Date: November-20-18 6:52:08 PM

Thank you Scott for writing this! Susan

From: Scott Harris
Sent: 19 November 2018 23:57
To: cnscconsultation.ccsn@canada.ca
Subject: Canadian Nuclear Safety Commission's (CNSC) draft RegDoc-1.1.5 "Licence Application Guide: Small Modular Reactor Facilities"

Environment North provides the following comments in response to the Canadian Nuclear Safety Commission's (CNSC) draft RegDoc-1.1.5 "Licence Application Guide: Small Modular Reactor Facilities" (herein "RegDoc 1.1.5").1

Environment North is a Northwestern Ontario grassroots organization founded in the early 1970's for the purpose of ensuring a sustainable environmental and economic future for our region. More detailed information about the work we do can be found at www.environmentnorth.ca

Our concerns regarding nuclear energy, particularly the safe transport and storage of nuclear waste goes back several decades.

The small modular reactor (smr) initiative is of concern to us for several reasons.

Public transparency at the earliest stages of the process is lacking. Also, there is no guarantee that the process will trigger an environmental assessment, or provide information on the following: public and Indigenous consultation; considerations with respect to nuclear liability, security and safeguards; potential licensing, or waste management. (The proposal assumes the availability of a facility which is capable of accepting waste - a very distant possibility)

For these reasons, Environment North takes issue with the proposal as outlined in the Canadian Nuclear Safety Commission's (CNSC) draft RegDoc-1.1.5 "Licence Application Guide: Small Modular Reactor Facilities" (herein "RegDoc 1.1.5")

Sincerely
Scott Harris
On behalf of
Board of Directors
Environment North

Sent from my iPhone