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Written submission from the Canadian Nuclear Laboratories

Mémoire des Laboratoires nucléaires canadiens

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 Itée, à Chalk River

Hearing in writing based on written submissions

Audience par écrit fondée sur des mémoires

June 2020

Juin 2020





2020 May 29

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Reference Number: 80182

Comments on the Project Description for the Micro Modular Reactor Project at Chalk River (Num: CRPLIC-01-001, Rev. 2)

Canada, enabled by the hard work and ingenuity of many people still residing in our surrounding communities, led the world in the design and deployment of small reactors. And, we believe we can do it again. Our vision at CNL is to build on this legacy and to serve the world as a global hub for SMR research and technology.

Our 2017 Long Term Strategy set the ambitious goal of siting an SMR on a CNL-managed site by 2026. To achieve this, CNL launched a Request for Expressions of Interest to gather input and feedback from stakeholders across Canada and internationally. CNL received responses from academia, energy utilities, potential end users, host communities, and the nuclear supply chain. Included in those responses were 19 expressions of interest from technology developers interested in building a prototype or demonstration reactor at a CNL site. Based in part on that strong response, CNL moved forward with announcing a staged invitation process for those vendors interested in siting their demonstration unit at a CNL managed-site.

Global First Power (GFP) with its key partners Ontario Power Generation (OPG) and Ultra Safe Nuclear Corporation (USNC) has now progressed through the second stage of the invitation process, and has been invited to participate in Stage 3.

GFP has demonstrated throughout the CNL stage-gates that they are a responsible member of the nuclear sector, with an organizational and operational emphasis on safety of the public, workers, and protection of the environment. In addition, GFP's leading partners have demonstrated a strong safety culture centred on continuous improvement using best practices and organizational experience. GFP has stated clearly their commitment to undertaking thorough studies and consultation against the relevant requirements outlined in CEAA 2012 and will ensure the results are documented in the Environmental Impact Statements (EIS).

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For decades, the Chalk River Laboratories (CRL) site has hosted many nuclear projects and activities that provide precedents for collecting and documenting data that is relevant to the siting of a demonstration reactor. While Environmental Assessment decisions will be made independently of historical activities on the site, the CRL lands are very well characterized, and project proponents are able to build on existing baseline studies and years of operating experience to help inform their EIS.

In summary, CNL supports GFP's position that an EIS which considers the scope of the factors outlined in CEAA 2012 will enable the Canadian Nuclear Safety Commission (CNSC) to make a thoughtful and informed EA decision.

We thank you for the opportunity to provide our comments as part of your public consultation process. Please do not hesitate to contact me should you require additional information.

Regards

Dr. Jeffrey C. Griffin

Vice-President, Science and Technology

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Canadian Nuclear Laboratories