



**Written submission from
Molly Lawson Mulloy**

**Mémoire de
Molly Lawson Mulloy**

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 ltée, à Chalk River**

Hearing in writing based on written
submissions

Audience par écrit fondée sur des mémoires

June 2020

Juin 2020

From: [Molly Mulloy](#)
Sent: Monday, June 1, 2020 11:50 PM
To: [Interventions \(CNSC/CCSN\)](#)
Subject: Chalk River Small Modular Reactors EA

I, Molly Lawson Mulloy, fully endorse the submission by CELA and Dr Ramana which explains clearly the importance of this issue and the need for a thorough and detailed EA for Chalk River's Small Modular Reactor, and what is lacking in your current proposed EA.

It is imperative, for a project of this import, to have a thorough EA.

I am extremely concerned about inadequate plans for many aspects of the proposed EA.

Lifecycle costing, including at every stage essential to the functioning of the reactor, is essential.

Your current plans do not include in adequate detail:

Possible alternative energy sources.

Many are becoming far more viable than in the past, and each location on

Earth has at least some non-toxic energy sources close at hand.

We are living

in a world where we must do everything we can to avoid poisoning our planet's environments.

Nuclear has a history of and the inherent possibility of causing really dangerous long-term toxic contamination

of environments and living things. Our species is at a crucial point in our

history where we must learn to live lightly on the earth in a non-toxic, zero

waste, energy efficient, locally sustainable, renewable fashion, or perish.

Nuclear is not climate friendly -

reactors depend on a multi-stage nuclear fuel cycle, most of which produce vast

quantities of greenhouse gases.

Nuclear does not encourage energy conservation.

Nuclear produces waste products at every stage of the nuclear fuel cycle that are toxic and hazardous to life.

I understand that the nuclear industry is desperate to find a way to stay relevant and vital. I'm also well aware of

the long-term implications of nuclear power, including its ties to the nuclear

weapons industry, which the general public does not understand.

Nuclear is not the answer to our energy problems - and that includes small modular reactors.

I'm fully aware of the power of the industry and control over governments worldwide, and it's direct link with arms

and weapons manufacturers. And I am under no illusion that no stone will be

left unturned to keep Nuclear alive.

For all the above reasons, it is utterly imperative that there be a full, thorough and complete environmental assessment of any new Nuclear project.

Any EA needs a detailed assessment of possible environmental effects at each stage of the project.

(from fuel fabrication and transport of materials to construction, operation, decommissioning, transportation and long term management and storage of wastes to ensure they are kept isolated from the natural and human environments.

The EA must include effects of any/all potential malfunctions or accidents that may occur at each stage of the project.

There are insufficient measures to ensure prevention of accidental emissions, spills or other mishaps that may

occur (especially in a brand new technology); nor is there sufficient evidence

of protection against potential terrorist attacks,....

Details of followup programs and monitoring details are critical to a thorough EA.

Nuclear energy, as you are fully aware, has inherent risks. We are irresponsible if we don't do everything in our power to protect the planet and biodiversity. The ALARA principle is not good enough anymore. We must employ the Precautionary Principle with all nuclear and other energy installations. I must insist on more information forthcoming on all possible environmental and health impacts. Finally, thanks to the COVID-19 situation at present, I cannot provide more detailed comments at this time. Verifying the validity of my concerns is difficult to impossible with so many offices and organizations shuttered and/or operating with minimal staff. The comment period for the proposed EA needs to be extended, and all decision-making for this critical, precedent-setting EA suspended until all parties are satisfied.

Sincerely,
Molly Lawson Mulloy
(and yes, I am more informed than most people being an Environmental Science teacher and ecologist, who was raised in a nuclear town and is Pat Lawson's daughter!)

Molly LAWSON Mulloy



"It's not which way the wind blows;

It's the way you set your sails."