



Oral presentation

Exposé oral

**Written submission from the
Town of St. George**

**Mémoire de la
Ville de St. George**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022



March 22, 2022

VIA ELECTRONIC
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TELEFAX (613) 995-5086
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ORDINARY MAIL

Mr. Marc Leblanc,
Commission Secretary
Canadian Nuclear Safety Commission
280 Slater Street, Station B
Ottawa, Ontario K1P 5S9

Dear Mr. Leblanc

Re: Intervention on the Application by NB Power (NBP) to extend the Operating Licence of the Point Lepreau Nuclear Generating Station (PLNGS) beyond June 2022.

I am the Mayor of the Town of St. George an Incorporated Municipality, situated approximately 48 km west of the PLNGS. My direct interest in this intervention relates both to my position as Mayor and my personal concerns as a grandfather and a vegetable farm owner contemplating a future of Climate Change.

I am a registered Professional Engineer and a former Nuclear Safety Inspector with the CNSC.

SUMMARY

In the record of this intervention, I have identified the substantive reasons why, as Mayor of St. George, I fully endorse NBP's application to extend its Operating Licence for PLNGS. On the question of the term for the renewed Operating Licence, I have reviewed the proposed terms put forward by NBP and the Commission staff and compared these terms to the usual 5 to 10-year terms the Commission has previously granted. I consider the significance of the various duration terms to be inconsequential to the end goal of ensuring safety and environmental compliance. CNSC has an ongoing compliance verification program, and PLNGS will be required to report annually and demonstrate that both its actual and predicted Safety, Health, and Environmental performance meets the expectations set by the Regulator.

As a farmer and grandfather concerned about the effects of Climate Change on food production and the future of the next generations, I want to raise with the Commission the matter of the Canadian Regulator's responsibility under Bill C-12 Canada's Net-Zero Accountability Act. That responsibility dictates that the Commission ought to conduct its Regulatory business in a manner that remains accountable to the overarching National Commitment under Bill C-12. Such commitment requires that Energy producing entities in Canada ought to recognize and be accountable to the national pledges made under Bill C-12.

Such accountability can only exist if the Commission mandates the Applicant NBP to demonstrate that the existing and the planned Nuclear and Renewables Energy producing assets identified in the Applicant's Strategic Plan can meet Canada's Net Zero goal by the year 2050.

INTERVENOR POSITION AND SUPPORTING FACTS

NB Power and their team, which operates the Point Lepreau Nuclear Power Station, Unit #1 (PLNGS) have provided safe, reliable, and carbon-free electric power to our province and our communities in St George and Charlotte county New Brunswick for the past 39 years. This power station is a significant asset for the Provincial utility. The people of New Brunswick expect it to provide a vital supply of electrical energy for the foreseeable future.

The current hearing by the Canadian Nuclear Safety Commission (CNSC) to consider an application from NB Power to renew its Operating Licence for PLNGS provides members of the public, and me as the Mayor of St George, with an opportunity to provide my position to the Regulator about NBP's application.

My intervention on NBP's application is supported by the following three facts:

- My review of evidence describing the PLNGS safety and environmental performance: This evidence was provided to me during PLNGS outreach activities to Municipalities in

Charlotte County. The record of the Station's Safety and Environmental performance demonstrates that PLNG has met and continues to consistently meet all the regulatory requirements of the Canadian Nuclear Safety Commission.

- My experience as a Nuclear Safety Inspector with the Safety Culture of the Station: I am well aware of the Safety Culture of Operations since the Station commenced operation and can attest to the commitment of the Provincial Utility in maintaining excellence in the safety record of its Nuclear Operations.
- My direct knowledge that the staff that operates the Station live in our Community and the Town where I am Mayor and contribute significantly to the region's economy.

The above facts provide the basis for me to unequivocally endorse NB Power's request to extend the Operating Licence beyond June 2022 with no changes to current operations.

I will not use this intervention in support of the licence extension to advocate for any particular number of years as appropriate for the term of the renewed Licence. I understand that NB Power seeks a 25-year term, that the Commission staff is proposing a 20-year term, and that the standard term for a Reactor Operating licence renewals has been 5 to 10 years.

Regardless of the number of years the Commission chooses for the Operating Licence extension, I am convinced that the Station will continue to be subject to strict licencing conditions in each year of its operation. NB Power is required to report annually to the Commission about the Safety and Environmental performance of the Station. That process allows the Commission to annually review the terms of the Operating Licence regardless of the number of years the licence extension will be issued. Also the Commission staff rigorously verifies compliance with these condition during each year of the Operating Licence extension

THE COMMISSION'S RESPONSIBILITY UNDER BILL C-12

I submit that the Commission must consider its responsibility with respect to Canada's Bill C-12 which was enacted on June 29, 2021 to achieve accountability on the goal of Canada meeting net-zero greenhouse gas emissions by the year 2050.

The Applicant NB Power as a federally licenced entity and the Commission that licences NBP to operate Point Lepreau have an obligation to remain accountable to the spirit and the letter of Net-Zero Accountability Act Bill C-12.

Thus Bill C-12 ought to be viewed as imposing on Canadian Energy Utilities like NB Power an obligation to develop a strategic plan for their power generation business. Such plan ought to demonstrate compliance with the Canadian Net-Zero Accountability Act, Bill C-12 to reduce reliance on future carbon-emitting energy sources.

Given the vital role PLNGS operations play to minimize the use of carbon-emitting energy sources in the region, the goal of meeting that Net Zero directive ought to be viewed as a condition on the licencee. It is within the Commission's purview to demand that the Applicant is accountable for ensuring that Canada's Net Zero Directive will be complied with.

The present Integrated Energy Resource Plan (IERP) of NB Power issued in 2020 is not fully scoped to describe how the Net Zero directive will be met and does not demonstrate compliance with Bill C-12. *

In fact, the IERP projections are based on historical demand growth rates at 0.5% per annum and fail to account for the expected paradigm shift where historic energy demand growth expectation will be overtaken by the electrification of transportation. This flaw in IERP and the associated with it Strategic Plan will not permit the licencee to meet the requirements of Bill C-12 and to achieve Net-Zero emissions by 2050.

Since the IERP is not scoped to align with the time horizon of the Operating Licence, the Commission should mandate that more rigorous strategic planning is to be undertaken. Such a plan should consider duplicating existing, proven Net Zero plant designs like the design of PLNGS, or the development of new nuclear technologies and the adoption of renewable energy sources.

Keeping the public informed on the outcomes of this strategic plan ought to be a public consultation condition that NBPower should be required to demonstrate to the Regulator in its periodic reporting to the CNSC.

All of which is respectfully submitted



John Detorakis P.Eng.
Mayor of St. George

cc:

Mr. Brett Plummer Vice President and Chief Nuclear Officer, NB Power.
Hon. Mike Holland, Minister of Natural Resources and Energy Development
Hon. John Williamson, Member of Parliament, New Brunswick Southwest

Reference Note:

* - New Brunswick Electric Power Corporation, "2020 Integrated Energy Resource Plan"