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Written submission from Sustainable Energy Group Carleton County Mémoire de Sustainable Energy Group Carleton County

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



Senior Tribunal Officer, Secretariat Canadian Nuclear Safety Commission 280 Slater Street, PO Box 1046, Station B Ottawa, Ontario K1P 5S9

Sustainable Energy Group Carleton County
Sam Arnold, Coordinator
110 College Street, Woodstock NB E7M 1K6



506-328-9420

March 14, 2022

Re: Intervention by the *Sustainable Energy Group Carleton County* for the NB Power Licence Renewal Application (Hearing Ref.2022-H-02)

To whom it may concern:

We request to intervene in the hearing in the above-referenced matter. Please consider our opposing comments submitted to the Canadian Nuclear Safety Commission (CNSC), regarding the licence renewal of the NB Power Point Lepreau Nuclear Generating Station:

- NB Power's application for a 25-year nuclear licence for an aging reactor approaching the end of its scheduled operating life must not be granted. For safety and environmental concerns, we feel the current 5-year license is the maximum length that should be under consideration.
- Without the ability to weigh in regularly on critical matters of safety, security, environment and health, the people of New Brunswick could be facing the shock of 25 more years of a growing radioactive waste stockpile all in temporary storage that will be matched by the ever-growing debt at NB Power for its nuclear operations. This will then be followed by the long and costly decommissioning process that can take 50 years to return Point Lepreau to Greenfield Status.
- The NB Auditor General found that NB Power has a debt of \$4.9 billion, and that most of it \$3.6 billion is due to the cost of the Point Lepreau nuclear station. That amounts to a current nuclear debt load of more than \$4,500 for every child and adult in New Brunswick. Such a debt is not acceptable for a crown corporation meant to serve and benefit its citizens. It is reprehensible for generations yet to come to inherit the nuclear debt load they had no part in creating.
- The possibility that modular nuclear reactors will successfully be installed at Point Lepreau raises the additional concern of continuing the costly and unnecessary nuclear operations at Point Lepreau. The impossibility of participation in a public hearing or even to request an impact assessment (under the 2019 Impact Assessment Act) goes against the interest of the public good, common sense, and morality.
- Respectful of the demands made by the Indigenous Wolastoq Grand Council on whose traditional, ancestral and unceded territory the reactor is located "That the Point Lepreau nuclear plant be phased out and renewable power generation and storage solutions alongside efficient energy

transmission and distribution be utilized in place of nuclear energy." The wishes of the Wolastoq Grand Council need to be seriously honoured; they must not be overruled or ignored.

• The present devastating military attacks on Ukraine by Russia are a realistic reminder of the inherent risk that comes with nuclear power, including invasion, sabotage, hostage taking and the even greater threat of nuclear attacks by unlawful and combative nations. This is proving again that nuclear power and nuclear weapons have no place in our modern society because the people responsible for their safe keeping cannot be trusted to protect the public interest over corporate and national interests.

The responsibility to keep humans and nature safe for future generations is that of the CNSC and everyone. For the reasons above we implore the CNSC to carry out its duty as Canada's nuclear regulator to protect the people of New Brunswick from all unnecessary nuclear risks and to limit the operating licence at Point Lepreau to a maximum of five (5) years only.

Sincerely,

Samuel Arnold, Sustainable Energy Group