



**Written submission from
Global First Power**

**Mémoire de
Global First Power**

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

Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P. O. Box 1046
Ottawa, ON K1P 5S9
interventions@cnsccsn.gc.ca

March 24, 2022

SUBJECT: Point Lepreau Operating License Renewal (Ref. 2022-H-02)

Dear Commission Secretariat,

Please accept this letter as a written intervention for the CNSC hearing on May 11-12, 2022, to consider the application to renew the license for the Point Lepreau Nuclear Generating Station. On behalf of Global First Power, this letter is in support of the license renewal.

Global First Power (GFP) is a joint venture partnership between Ontario Power Generation (OPG) and USNC-Power Ltd., a wholly owned Canadian subsidiary of Ultra Safe Nuclear Corporation (USNC). Through the partnership, GFP proposes to construct, own and operate Canada's first small modular reactor (SMR), a USNC-designed Micro Modular Reactor® at Chalk River Laboratories, a site owned by Atomic Energy of Canada Limited (AECL) and managed by Canadian Nuclear Laboratories (CNL).

Our project is a 15-megawatt (MW) thermal (approximately 5 MW electrical) reactor which will generate low-carbon, reliable energy for use in remote industrial applications (like mining or heavy industry) and will serve as a commercial demonstration to show how this advanced energy technology can be part of the solution to support Canada's climate change goals.

We are supportive of the license renewal for Point Lepreau for the following reasons:

- Canada has a rich history and worldwide industry reputation in the leadership and excellence in nuclear innovation and development.
- For seven decades, our nation has pioneered advancements in nuclear technology for the peaceful benefit of the world, culminating in Canada's achievement of being a Tier 1 nuclear nation.
- The decades-long safety record of the entire Canadian nuclear fleet demonstrates a history of operating to the highest levels of safety and environmental protection and an ongoing commitment to continuous improvement.
- As part of this rich legacy, the Point Lepreau Nuclear Generating Station has operated safely for four decades, and today contributes more than a third of the energy used by New Brunswickers.
- The low-carbon energy from the station is almost completely free of greenhouse gas emissions and will continue to be even more important in the years to come, as New Brunswick and all of Canada strives to achieve a net zero carbon future.
- New Brunswick Power has a comprehensive Indigenous and public engagement program which includes a commitment to transparency in their communications and demonstrates high standards for industry peers to emulate.

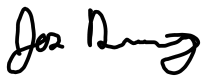
- Today, this rich history of nuclear excellence is setting the stage for companies like GFP to continue to carry the torch of nuclear excellence in Canada.
- We are fortunate to be able to build on the legacy that has been established by the nuclear operators in Canada, like New Brunswick Power, which includes: an admirable nuclear and conventional safety record, continued commitment to operational excellence and environmental protection, and a comprehensive Indigenous and public information program that has helped earn their social licence and public confidence.
- We understand New Brunswick Power has applied for a 25-year operating licence. We have trust and confidence in Canada's robust regulatory framework that ongoing, rigorous oversight will be in place by the Canadian Nuclear Safety Commission (CNSC) no matter the duration of the licence granted. As Canada explores the advancement of SMRs, the enhanced safety features of technologies (like GFP's MMR®) may align well with a longer licence duration, so we appreciate the CNSC's careful consideration of this request.

It is with thanks to Canada's nuclear operators, including New Brunswick Power, that companies like GFP will ensure nuclear energy remains a critical part of the low carbon energy future for Canada.

As is often said, Canada needs "all the tools in the toolbox" if we want to achieve a net zero carbon future. That means, we will continue to rely on the existing sources of low carbon energy – like the Point Lepreau station – in addition to building new technology innovations that can offer low carbon solutions, like GFP's MMR® Project.

In closing, Global First Power supports the application by New Brunswick Power to renew the operating license of the Point Lepreau station. We appreciate the opportunity to provide input and comments on this important process.

Signed:



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