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Written submission from Jessica Buckley

Mémoire de Jessica Buckley

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, P.O. Box 1046, Station B Ottawa, Ontario K1P 5S9 Sent by email <u>interventions@cnsc-ccsn.gc.ca</u>

Jessica Buckley St. Andrews, NB

2022-03-19

RE: Intervention (written submission) by Jessica Buckley for the NB Power License Renewal Application (Hearing Ref. 2022 - H - 02)

To whom it may concern:

I, Jessica Buckley, would like to express my opposition as a resident of Charlotte County to New Brunswick Power Corporation's request to relicense Point Lepreau. It is offensive to my sensibilities to increase NB Powers' freedom to operate Point Lepreau Nuclear Generating Station with less accountability and transparency.

Every day PLNGS is in operation, we contribute to our very own environmental catastrophe, we lessen our safety, we sacrifice our health (as acknowledged by even NBP - ...local residents receive radiation exposures from tritium. This is from ingested tritium, inhaled tritium, and tritium absorbed through skin...). These intakes increase the probability of getting cancer and other radiogenic diseases.

Every day PLNGS is in operation adds to our mess that is literally impossible to clean. NBP and the CNSC are tasked with safely operating a critically dangerous number of substances and processes. I acknowledge these processes and substances are placed under many levels of scrutiny. But the license application, if approved, ensures we scrutinize less. NO.

Shorter-term (1 - 5 year) licences should be relied upon as they provide more frequent opportunities to publicly assess if a licence is in accordance with purposes, and in compliance with regulatory requirements, CNSC RegDocs and international guidance. Also, it is no secret that public hearings before the CNSC provides greater procedural rights and protections than other CNSC forums, such as the annual Regulatory Oversight as, while licence renewal hearings are subject to provisions of the NSCA and the CNSC's Rules of Procedure, RORs are not.

The CNSC and NBP have expertise and understanding of what is held within the walls of PLNGS, the mechanisms and processes needed to extract energy and the waste produced. However, when the public seeks documentation such as the hazard assessment, or the cost estimate of decommissioning we receive only heavily redacted documentation, and with

CNSC staff's recommendation for a 20-year license (which actually extends past the date of decommissioning!?!) we will receive even less information.

CNSC is meant to "regulate the use of nuclear energy and materials to protect health, safety, security and the environment." These standards are not something that the general public can measure due to lack of transparency, access to information and problems with accountability.

We need to start the process of returning the area to what it once was; safe. However – that goal is in the past – the next best goal is NO MORE waste produced. That is why I implore you to refuse the NB Powers application for a 25-year operating permit, and the recommendation of the CNSC staff of 20 years.

Additionally, the idea of adding (and investing in) small modular nuclear reactors at PLNGS is highly disturbing. There is no conceivable reason for their want to create more waste – though they promote SMNRs as a way to 'recycle' fuel – which is preposterous propaganda.

I try to understand your roles in perpetuating the use of nuclear power but how does CNSC fail to see how we need to remove nuclear power as 'baseload'? Nuclear power creates the most terrifyingly real waste imaginable; inconceivably toxic, dangerous and eternal. Some refer to it as 'risky' but is it still a risk if it's already happening – emissions (water and air, and solid wastes HLW, ILW and LLW) are poisoning environmental and public health – is it CNSC's role to say 'it's an acceptable repercussion' or is it CNSC's role to protect health, safety, security and the environment.

Thank you for your consideration,

Jessica Buckley