



**Written submission from
Tom McLean**

**Mémoire de
Tom McLean**

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

From: Tom McLean
Sent: March 27, 2022 1:46 PM
To: Interventions / Interventions (CNSC/CCSN)
Subject: Intervention PLNGS Hearing Ref. 2022-H-02

Please consider this email my written intervention to the Canadian Nuclear Safety Commission, regarding the licence renewal of the NB Power Point Lepreau Nuclear Generating Station.

I am both a parent concerned about leaving my children with a legacy of radioactive waste and a member of the public concerned about nuclear power and how climate change may impact the facility.

NB Power's request to renew the licence of PLNGS for 25 years would effectively prevent any public input during the remaining life of the station.

A lengthy renewal at a time when there are so many uncertainties that could affect the station's safety, reliability and financial viability, would show a flagrant disregard for the public interest. It is critical that there be regular, timely opportunities to input the evolving needs and concerns of upcoming generations in New Brunswick. NB Power's request to renew the licence of PLNGS for 25 years would effectively prevent any public input during the remaining life of the station.

The Point Lepreau plant continues to be a financial boondoggle. New Brunswickers may decide to close it down before 25 years, especially due to the recent and continuing dramatic drops in cost of wind, solar and power storage.

Conclusion #1: The CNSC must not renew the operating licence for Point Lepreau power station for the requested 25 years. Instead, the CNSC should continue to consider 5-year relicensing periods, and work toward decommissioning.

This is a time of uncertainty as we face climate change and rapid technological advancement. The nuclear industry, in particular, is experiencing significant cost increases and lengthy delays in refurbishment and replacement of nuclear facilities. At the same time, the costs of alternate sources of power and energy efficiency are falling.

The Lepreau station has a history of reliability issues:

- Electricity production at Lepreau has not met production targets, in the first 7.5 years since a disastrously long and over-budget refurbishment, requiring an additional \$500 Million in capital expenditures.
- The most recent unplanned outage, only 11 weeks after a two-month planned maintenance, was 40 days in January and February 2021 during peak demand.
- The pace of the reactor's aging and the emerging reliability and costs of operation, need to be regularly shared with the public in a relicensing format, to allow input on decisions about continued operations, in the public interest. Those decisions will include committing to expenditures required for Lepreau, versus investments in alternate sources of power.

Conclusion #2: In the interest of ensuring flexible, responsive, publicly- sanctioned decision-making for such uncertain times, the CNSC must not renew the operating licence for Point Lepreau power station for the requested 25 years.

Instead, the CNSC should continue to consider 5-year relicensing periods, to ensure regular public review allowing for public input to planning as patterns emerge, and before choices are forced.

Nuclear power is particularly vulnerable to climate change effects, including thermal disruptions (e.g. heatwaves and droughts) and extreme weather events. For example, a recent study showed that extreme weather events have become the leading cause of nuclear power plant outages in North America and South and East Asia.

Conclusion #3: Recommend that the CNSC expressly consider climate impacts and vulnerabilities when granting a licence. As climate impacts become more frequent and pronounced, the CNSC must consider climate change in the context of licensing because of the major safety and environmental issues it poses to operations, health and safety. The precautionary principle would guide the CNSC to, at maximum, only continue to consider 5-year relicensing periods.

The civil nuclear industry is the source of the material used to make nuclear weapons. Nuclear weapons proliferation risks will be among us as long as the civil and military nuclear industry continue to exist.

NB Power is supporting the development of a reprocessing plant that will extract plutonium from the spent (irradiated) fuel made by the Lepreau Nuclear reactor. Extracting plutonium raises concerns about nuclear weapons proliferation. See the article in the Bulletin of Atomic Scientists about New Brunswick's plutonium plans.

Conclusion #4: The CNSC must ban the extraction of plutonium from the spent fuel made by the Point Lepreau Nuclear reactor.

Please acknowledge receipt of this email. Thank you.

Tom McLean
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