



**Written submission from
Council of Canadians Fredericton
Chapter**

**Mémoire du
Conseil des Canadiens, chapitre de
Fredericton**

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

Council of Canadians Fredericton Chapter
Garry Guild
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March 14, 2022

Re: Intervention by Council of Canadians Fredericton Chapter for the NB Power Licence Renewal Application (Hearing Ref.2022-H-02)

To whom it may concern:

We, Council of Canadians Fredericton Chapter, request to intervene in the hearing in the above-referenced matter.

Please consider this comment submitted to the Canadian Nuclear Safety Commission, regarding the licence renewal of the NB Power Point Lepreau Nuclear Generating Station.

We are a citizen's group concerned over the how the future of the next generations will be directly impacted by choosing nuclear over renewables, how climate change may impact the facility and leaving future generations with the legacy of radioactive waste.

Our concerns are related to the following:

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 as we quickly transition to renewables and energy efficiency programs.

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 Council of Canadians supports the 2018 Proclamation of the Decennium of the Rights of Nature, which "calls on people, organizations and national and international institutions to unite in a common effort to deeply comprehend and develop the rights that protect Nature as the main subject of imminent dignity." We are concerned with both, the fish-kill from the Point Lepreau water intake from the Bay of Fundy and the impact of tritium emissions on those waters, given that Canada's 'safe' standards allow higher levels than other countries. In light of this, the licence renewal must be revisited

regularly when the facility can be required to address emerging impacts as they are identified and before irreversible damage to the marine and human life in the Bay's environs.

The CNSC must consider the impact of radioactive wastes within this licensing hearing. The CNSC should not continue to licence nuclear power plants when no known solution yet exists for radioactive wastes and when alternative sources of power can be readily implemented within years, not decades!

Please acknowledge receipt of this email.

Sincerely,

Garry Guild on behalf of:

Council of Canadians Fredericton Chapter

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