



Bonnechere River Watershed Project

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“Helping Ourselves to a Healthy Environment”

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Subject: Comments on Global First Power's “Project Description for the Micro Modular Reactor Project at Chalk River” Document No: CRP-LIC-01-001

On behalf of the Bonnechere River Watershed Project, I would like to express our concern about Small Modular Nuclear Reactors and the Global First Power proposal to construct and operate the first SMR in Canada at the Canadian Nuclear Laboratories property in Chalk River, Ontario.

Our particular concerns about SMRs include:

- SMRs are only in the early stage of design and will take many years to develop; unlike the operating reactors in Canada, the designs are largely untested;
- SMRs are not commercially viable and cannot be developed without large tax subsidies;
- Reactors similar to the one being proposed by Global First Power have been constructed in the United States and Germany; these have had a poor track record and a history of accidents and failures; the wastes are highly radioactive;
- accidents will be even more challenging to deal with given the intention to deploy SMRs in mine sites, small and/or remote and Northern communities;
- SMRs produce toxic, long lived radioactive waste that must be isolated from the biosphere for millennia, adding greatly to their lifecycle costs, and burdening future generations with environment and human health risks, more radioactive waste disposal and radioactive waste management.

In contrast, as a greenhouse gas reduction strategy, renewable forms of energy production are further along in development, less risky to human health and the environment and quicker to deploy.

In addition, there are serious deficiencies in the project description by Global First Power for the "Micro Modular Reactor" to be constructed and operated at Chalk River. Of particular concern to us (and others) are:

- lack of a plan to manage the waste that will be generated by the project;
- lack of details on financial support being provided by federal authorities;
- lack of detail on where the enriched fuel would come from for the project;

- lack of consideration for risks of proliferation and terrorism associated with use of enriched fuel.

Furthermore, we are concerned that the proposed project will be constructed at the CRL property on the shore of the Ottawa River that is managed under contract to the federal government by a multi-national consortium of nuclear waste companies that includes SNC Lavalin. There is already a legacy of nuclear waste at Chalk River (and elsewhere) that needs to be managed more responsibly for the long term.

If this license application proceeds, it must include a full environmental assessment review including a hearing with independent panel members, participant funding and a timeline that supports public participation.

However, we sincerely hope that CNSC will choose instead to focus on responsible management of our current legacy of nuclear waste rather than approving further nuclear proliferation, especially adjacent to a nationally significant waterway and ultimately into small and/or remote and Northern communities.

Regards,

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