

Comments on Global First Power's Inadequate Project Description for Micro Modular Nuclear Reactor (MMNR) Project at Chalk River - September 14, 2019

To whom it may concern,

This 'project description' is inadequate; our comments are below.

Thank you,

Tony Reddin & Marion Copleston,

<Personal Information Redacted>

1. There is inadequate description of activities to be performed in relation to the project :
 - a) use of enriched uranium fuel - a description of fuel fabrication activities should be part of a complete project description.
 - b) waste management- a description of any gaseous wastes being produced during plant operation; and details on plans for packaging, storage, transport, and disposal of Low and Intermediate Level Waste should be part of a complete project description.
 - c) decommissioning- a complete plan to deal with irradiated graphite waste and concrete should be part of a complete project description.

2. The project description does not acknowledge that this novel MMNR reactor type is likely to entail high and uncertain decommissioning costs, and does not explain how these costs would be estimated.

3. The project description does not acknowledge financial support that federal authorities are, or may be, providing to the project.

4. If the CNSC decides to proceed to a scoping of an environmental impact statement for this project, despite these deficiencies, the scoping decision should be made by the full Commission and should include a public hearing with advance notice. In past, the Commission has made environmental assessment scoping decisions at one-member hearings held with no public notice. In one case, this hearing took place only a matter of days before release of an environmental impact statement by the proponent. This is unacceptable.