To: Impact Assessment Agency of Canada (IAAC)
From: Canadian Coalition for Nuclear Responsibility (CCNR)
Re: Comments on the Draft Integrated Tailored Impact Statement Guidelines for the New Nuclear at Wesleyville Project.
Date: May 7 2026

The Canadian Coalition for Nuclear Responsibility (CCNR) has reviewed the Draft Integrated Tailored Impact Statement Guidelines for the New Nuclear at Wesleyville Project, and offer the following comments on those Draft Guidelines. It is expected that these comments will be posted on the IAAC web site.

Federal Authority

On page 45 of OPG's Summary Project Description (SPD) the proponent states that "

> "The NNW Project is not anticipated to affect federal lands. The NNW site is not located on nor adjacent to federal lands."

However, the Agency (IAAC) correctly points out on page 2 of the Draft Guidelines that

> "The IAA requires the assessment of non-negligible adverse effects of a 'federal work or undertaking.' As the production of nuclear energy is declared to be to the general advantage of Canada in the *Nuclear Energy Act*, this project is considered to be a federal work or undertaking as defined under the *Canadian Environmental Protection Act* (1999). Therefore, adverse federal effects within federal jurisdiction, as defined under the IAA, also include changes to the environment or to health, social and economic conditions and the positive and negative consequences of those changes that are likely to be caused by the carrying out of the project."

CCNR is pleased to see the Agency clarifying its authority on the matter of federal jurisdiction. Because the government of Canada has carved out by law a special federal authority whenever it comes to nuclear facilities, the scope of the impact assessment is not restricted to potential impacts on lands that are federally owned, but extends to any lands that might be impacted by the nuclear facility, which is itself automatically placed under federal jurisdiction. That includes changes to the environment or to health, social

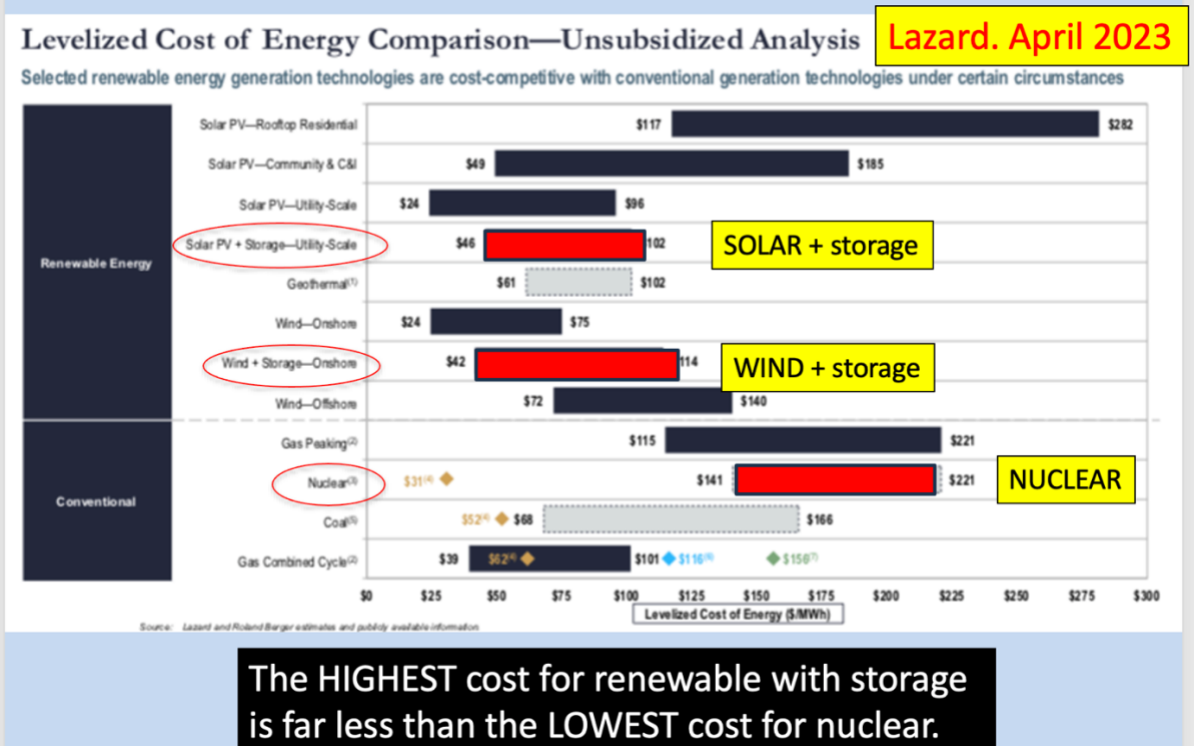
and economic conditions, and the consequences of those changes that are likely to be caused by the carrying out of the project.

Alternatives

CCNR strongly objects to section 2.8.3 of the Draft Guidelines which states that “IAAC will rely on the proponent’s Initial Project Description demonstrating that there are no alternatives to the project that are technically and economically feasible…” The Impact Assessment Act clearly states that the Agency “must” consider “alternatives to the project,” as well as alternative means of carrying out the project – as exemplified by OPG’s insistence on evaluating more than one reactor technology using the industry-sponsored Plant Parameter Envelope approach.

Accordingly, CCNR believes that IAAC is legally bound to require the proponent to consider alternatives to the project, whose intention is to produce electricity. It is not for the proponent to tell IAAC its job, but for the IAAC to live up to its legal obligations. Of course the Agency is not going to interfere in any way with the province’s authority to set its own energy policy, but the Agency has been charged by Parliament to ensure that those alternatives are properly evaluated according to the terms of the ACT.

It is very well established, world-wide, that renewable energy sources such as solar and wind are not only competitive with nuclear power, but are in fact far less expensive even with the latest utility-scale storage systems that are able to compensate for the variable nature of those renewable energies. According to the highly respected Wall Street firm Lazard, the highest estimated cost of solar with storage or wind with storage is much less than the lowest estimated cost of nuclear.



Not only is renewable energy economically feasible but also technically feasible. The International Energy Agency reports as follows:

> "Electricity generation from renewables is expected to increase 60% – from 9 900 TWh in 2024 to 16 200 TWh in 2030. In fact, renewables are expected to surpass coal at the end of 2025 (or by mid-2026 at the latest, depending on hydropower availability) to become the largest source of electricity generation globally. Solar PV alone accounts for over half of this increase, followed by wind (30%). The share of renewables in global electricity generation is projected to rise from 32% in 2024 to 43% by 2030, while the share of variable renewable energy sources set to almost double to 27%. Over 2025-2030, renewables are expected to meet over 90% of global electricity demand growth."
>
> IEA, Renewable Energy, https://www.iea.org/reports/renewables-2025/renewable-electricity

For thirty years following the Three Mile Island nuclear accident in Harrisburg, Pennsylvania – a partial meltdown in 1979 that destroyed the reactor core – there were no new power reactors given a "licence to construct" anywhere in North America. Then four reactors were authorized by the US NRC for construction, two in Georgia and two in South Carolina. Those in Georgia were cancelled and Westinghouse Nuclear went

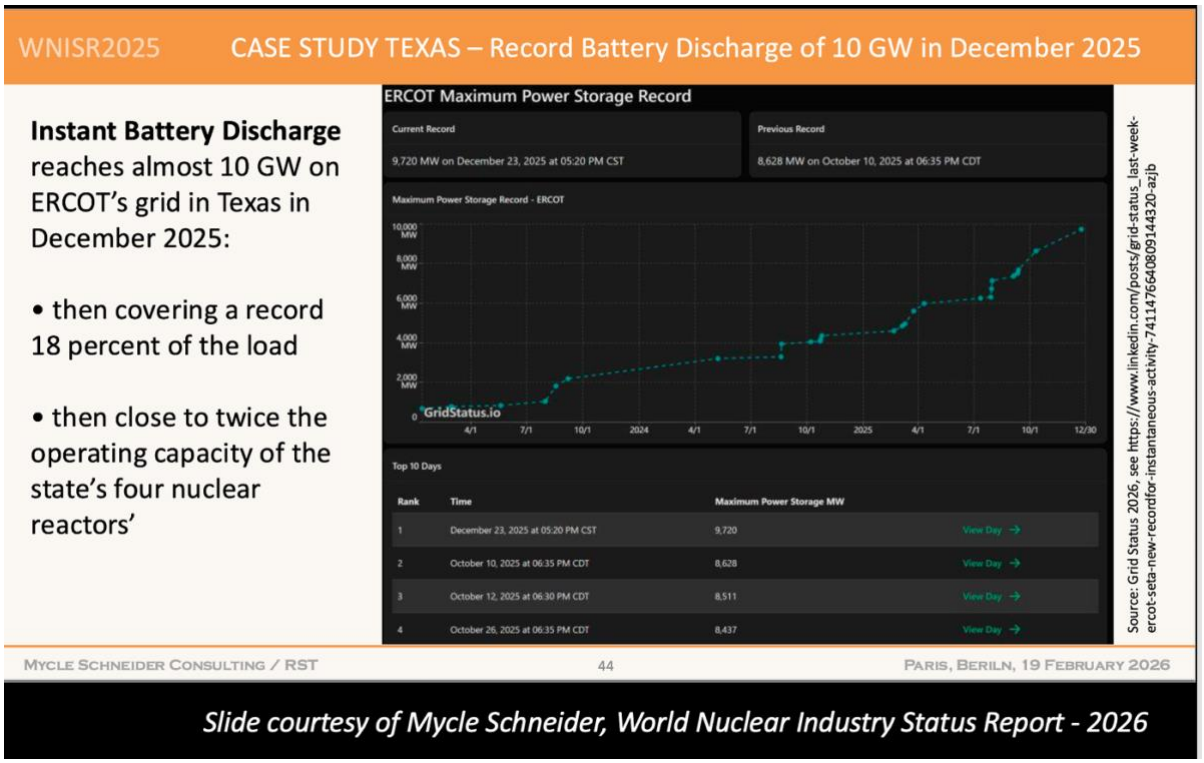
bankrupt over the $9 billion in losses that ensued, while the two in South Carolina were finished and are now operational. However, recent analyses have shown that these reactors – the only new ones built in North America for the last 47 years – are by far the most expensive electricity generating plants ever built in the entire world. They ended up at $47 billion USD, which is $22 billion more than the original estimate. Ratepayers have seen their electricity bills increase by 24% with more increases to come.

See https://energytransition.org/2026/04/the-billion-dollar-boondoggle-how-vogtle-became-the-uss-monument-to-nuclear-folly/ .

While nuclear costs have steadily increasing, the cost for renewables, and the cost for battery storage, has been steadily declining year by year, while capacity has been steadily increasing.

In late December 2025, in Texas, power was drawn from battery storage – as reported by ERCOT (Electric Reliability Council of Texas) – at the rate of almost 10 gigawatts. That's the same size power rating as the projected Wesleyville electrical plant. No one can truthfully say that such renewable/storage alternatives are not feasible, whether on technical or economic grounds.

See https://modoenergy.com/research/en/ercot-battery-buildout-2025-annual-report



IAAC is required to follow the law. The law says that alternatives to a project that are feasible on technical and economic grounds must be assessed. Not "may" be, not "should" be, but "must" be. There is no mention of politics or "policy grounds".

In section 2.8.3, we read that the Agency "will not reassess provincial energy policy or determine the appropriate electricity generation mix for the province," and therefore will not require the proponent to evaluate these technically and economically feasible alternatives. But those are political considerations, not environmental nor economic nor technical considerations. It is not up to the IAAC to make decisions based on politics. The law is the law and must not be eviscerated simply because the province or the utility is unhappy and would prefer not to do the necessary homework.

Radioactivity

CCNR is disappointed that so little of the Draft Guidelines document deals with radionuclides – how they are created, how they are released, how they interact with living things, how the radioactive legacy of the nuclear age is to be dealt with in the context of this proposed facility.

The one thing that sets nuclear power plants apart from all other electrical generating facilities is the fact that they actually create hundreds of varieties of new unstable elements – the radioactive byproducts of the fission process. There is no other industrial enterprise that does that. Most of these materials were never found in nature before 1940.

These newly created radioactive poisons are categorized as fission products, activation products, and transuranic elements. Some portion of them are routinely released into the atmosphere or via liquid effluents during operation, while the bulk of the radioactuve waste materials end up as high-level nuclear waste (irradiated nuclear fuel), intermediate level waste (neutron-activated pipes, plates, vaults, calandrias, thermal shields, biological shields, ion-exchange resins, et cetera) and large volumes of contaminated equipment and soil.

It is doubtful whether it is technically or economically feasible to ever return the site of a large nuclear power station to anything resembling a “green field” status. It is likely to remain a radioactively contaminated site for generations. Yet there is virtually no indication in the Draft Guidelines of the unique challenges posed by the radioactive demolition of several large defunct reactors and the safe containment and management of countless tonnes of radioactive rubble.

No power reactor in Canada has ever undergone the final stage of decommissioning – dismantling, disaggregating and safely packaging the highly radioactive core structures,

none of which can be recycled for commercial use but must be stored permanently as long-lived radioactive waste. All of these radioactve materials will require packaging, transportation and then secure storage for thousands to millions of years. Before transporting there will be cutting, grinding, segmenting, compacting, incinerating, melting, and then trucking the waste packages for many decades over public roads and across bridges, traversing muncipalities to some yet-to-be-determined final restng place. None of this hazardous activity is touched upon in the Draft Guidelines.

Accidents

As the legacy of Three Mile Island, Chernobyl, and Fukushima Daiichi remind us, nuclear power plants are capable of wreaking havoc in the event of an unlikely but not impossible accident resulting in severe core damage (melting of the core) and large releases of radioactive materials. Such an accident can have long-lasting environmental repercussions. Emergency planning is essential. And the Act clearly states that the impcat assessment of a designated project "must" take into account "the effects of malfunctions or accidents that may occur in connection with the designated project".

The existing Draft Guidelines are woefully lacking in addressing accidents. Contrast the existing draft document with the IAAC Draft Guidelines for the Peace River Nuclear Project. Here is a section copied from the Peace River Summary Guidelines document:

> Section 12: Effects of Potential Accidents or Malfunctions
>
> Instructions to Energy Alberta include:
>
> - Identify and describe all realistic accident scenarios, including:
>   - Equipment failures, fires, explosions, chemical leaks, radiological hazards
>   - External hazards: earthquakes, wildfires, ice storms, floods, storms, plane crashes
>   - Human error or cyber security incidents
>   - Malfunction or failure of upstream hydroelectric facilities
>   - Transportation accidents involving hazardous or radioactive materials
>   - Potential effects of climate change
> - Predict how these events could affect:
>   - Public safety

- Air and water quality
- Wildlife and habitats
- Indigenous rights and land use

- Estimate the likelihood and consequences (short and long term) of each event
- Assess the risk to the health and safety of workers and the public over the lifecycle of the project
- Develop and describe mitigation strategies:
  - Emergency response plans (including a description of current emergency response systems)
  - Containment systems
  - Spill control and radiation protection measures
  - Communication protocols with first responders, the public, and Indigenous Nations and communities
  - Long-term monitoring and recovery measures
- Outline financial guarantees to ensure compensation and environmental restoration in the event of a disaster

The Wesleyville plant is more than twice as large as the proposed Peace River plant, and the size of the potentially affected population from a disastrous accident at Wesleyville is very much larger than the corresponding situation in Alberta. •

Conclusion

CCNR believes that the Draft Guidelines for the New Nuclear Wesleyville Project can and should be greatly improved, with a particular emphasis based on a profound rethinking of the special importance of assessing alternatives and focussing more precisely on radioactivity as a uniquely important feature of any juclear generating plant.

This report was prepared by Gordon Edwards, Ph.D.,
President, Canadian Coalition for Nuclear Responsibility,