



**Written submission from
Environment North**

**Mémoire de
Environment North**

In the Matter of

À l'égard de

**Decision on the scope of an environmental
assessment of the proposed Micro Modular
Reactor Project at the Canadian Nuclear
Laboratories Ltd., in Chalk River**

**Décision sur la portée de l'évaluation
environnementale pour le projet de
microréacteur modulaire aux Laboratoires
Nucléaires Canadiens ltée, à Chalk River**

Hearing in writing based on written
submissions

Audience par écrit fondée sur des mémoires

June 2020

Juin 2020



June 1, 2020

This is the submission of Environment North and also a letter in support of the submission by the Canadian Environmental Law Association regarding the scope of the environmental assessment (EA) for the small modular reactor (SMR) at Chalk River.

Since 1972, Environment North has functioned as a regional non-governmental environmental organization.¹ Through research, education and community advocacy we promote sustainable communities and conservation of our resources. Based in Thunder Bay, our goal is to benefit the community by protecting the environment and increasing the public's understanding of the environment.

Environment North is concerned about the stated scope of the Environmental Assessment for the proposal for a small modular reactor (SMR) at Chalk River, Ontario. We have concerns about

1. the review process itself and
2. "the foot in the door" approach, i.e. that this may act as the precedent for future reviews.

Environment North maintains that MMNRs/SMRs are NOT a viable solution for energy needs for Northern communities or remote mining sites. Details can be supplied.

The promotion of MMNRs/SMRs has some aspects of historical promotions. In the 1950s, future nuclear generated electricity was tagged as being "too cheap to meter". Much was left out of the initial accounting in the mid-20 Century: including nuclear waste disposal and transport, decommissioning and eventual abandonment of reactor sites. Selling points of SMRs include that they are "small" and adaptable because of their short lifespan (say 20 to 30 years, a typical lifespan of mining operations). Environment North has questions and concerns about the transport and storage of wastes from SMRs.

Currently, there are no existing sites proven to be safe for present nuclear waste in Canada. Current scoping does not have detailed or accepted solutions for SMRs. For the above reasons and other reasons set out by CELA and Ramana (See this submission), we request a thorough re examination and discussion about the identified issues presented in their letter. We also agree with their request for an extension due to the COVID Pandemic which has resulted in cancellation of meetings to discuss issues. Ample time for public participation and input is essential for consideration of these proposals.

Respectfully
Ms. Dodie LeGassick
Nuclear Lead

Graham Saunders
President - Environment North
