

To: [Consultation \(CNSC/CCSN\)](#)
Subject: small modular reactors
Date: November-20-18 2:37:13 PM
Attachments: [Cnsc letter.docx](#)

Please consider my comments in the attached letter.

Thank you.

John Spears

To the Canadian Nuclear Safety Commission

Re: REGDOC – 1.1.5 Licence Application Guide: Small Modular Reactor Facilities

Please accept these comments on your review of small modular reactors.

I believe your current review process is premature. These proposed reactors will create highly radioactive nuclear waste. Canada currently has no facility capable of permanently storing or disposing of high level nuclear waste, despite the fact that large reactors have been operated by electric utilities in Canada for more than half a century.

Until Canada has approved and constructed a facility capable of permanently handling high level nuclear waste, the CNSC should suspend any proceedings related to small modular reactors. High level radioactive waste, if mishandled, poses a threat to all forms of life for many centuries to come. It makes no sense to consider building and operating new reactors when we have no facilities to deal with the waste that they will inevitably produce.

I am fully aware of the work currently being undertaken by the Nuclear Waste Management Organization. It may come to fruition; it may not. It would be a mistake for the CNSC to assume that the NWMO will succeed. What if it does not? We will be left with an even greater stream of high level waste with no facility to handle it.

Safely handling high level nuclear waste is a matter of public safety. As a guardian of safety, the CNSC should not approve a new generation of reactors without a guarantee that the high level waste can be permanently stored or treated. At the moment, no such guarantee exists. The CNSC is failing in its mandate by proceeding with a licensing process when the proponents cannot say what will happen to the dangerous waste they will produce. The proponents should be told to re-apply when facilities to treat their waste have been constructed and demonstrated their ability to operate safely.

I also believe the CNSC should require small modular reactors to undergo a full environmental assessment.

Thank you for your attention.

John Spears