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To: Consultation (CNSC/CCSN)
Subject: OFWCA Comments on (DRAFT) REGDOC-1.1.5: Licence Application Guide: Small Modular Reactor Facilities

November 20, 2018

Canadian Nuclear Safety Commission
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Old Fort William Cottagers' Association's (Sheenboro, Quebec) comments on (DRAFT) REGDOC-1.1.5: Licence Application Guide: Small Modular Reactor Facilities

To whom it may concern,

On behalf of Old Fort William Cottagers' Association (OFWCA), I wish to thank you for this opportunity to comment on the Draft License Application Guide for Small Modular Reactor Facilities. Our community, the first community downriver from Chalk River in Quebec, and association are greatly concerned about the development of Small Modular Nuclear Reactors (SMRs).

Since the license hearing in Pembroke, Ontario in January 2018 regarding the relicensing of Chalk River Laboratories, we have lost what had remained of our confidence in the CNSC to be objective and to take seriously the concerns, criticisms, and opinions of local communities and citizens. Instead of protecting the environment and the health of Canadians, the CNSC seems to focus its attention on promoting the nuclear industry. This is deeply troubling to us.

We read in the Globe and Mail on November 6, 2018 that the CNSC has "urged the federal government to allow smaller nuclear reactors to avoid lengthy impact assessments, a move that would create an easier and faster path for commercialization of the technology.... The CNSC encourages the government to exempt small modular reactors from the list of designated projects that would receive a full panel review, and warns that lengthy regulatory delays could kill a promising industry."

How could our downriver communities accept that international companies will be experimenting with SMRs, an unproven technology, at Chalk River without a comprehensive review of the safety and environmental risks.

OFWCA is absolutely against this - small modular nuclear reactors must undergo rigorous environmental assessments. Regulation of this technology must also be open and transparent. Safety standards must not be weakened to benefit the nuclear industry. Safety standards are essential for the protection of our environment and citizens.

Further, OFWCA believes that until federal policies regarding the safe management of low- and intermediate-level nuclear waste have been developed in consultation with First Nations and Canadian citizens, no further development of nuclear reactors (small or large) should take place. Small Modular Nuclear Reactors will produce highly radioactive waste and at this time there is no suitable facility in which to store that waste. (CNL's proposed "NSDF" is not at all suitable - the facility is inadequate for long-lived radionuclides and the planned location for the facility is far too close to the Ottawa River). So until there are federal policies and a suitable facility for the radioactive waste which will be produced by these SMRs, OFWCA is against SMRs being tested and developed at Chalk River.

Without open and transparent regulation and rigorous environmental assessment, trust will not be regained.

Sincerely yours,

Johanna Echlin