

To: [Consultation \(CNSC/CCSN\)](#)
Subject: New Clear Free Solutions Response to Comments on CNSC'S Small Modular Reactor Licence Application
Date: November-19-18 11:15:48 AM
Attachments: [New Clear Free Solutions Response to Comments on CNSC'S Small Modular Reactor Licence Application.docx](#)

Please see attached comments from New Clear Free Solutions.

Regards

Chris Rouse

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario, Canada K1P 5S9

via email cnscconsultation.ccsn@canada.ca

November 19, 2018

RE: Response to Comments on CNSC'S Small Modular Reactor Licence Application Guide

To whom it may concern:

This letter is an expression of support for the comments received by the Canadian Environmental Law Association, Concerned Citizens of Manitoba, Greenpeace and Northwatch regarding the proposed licensing of Small Modular Reactors (CNSC RegDoc 1.1.5).

We agree that any discussion of SMRs, including their proposed licensing, must be transparent and information, reports and meetings between stakeholders, industry and the CNSC proactively disclosed. The public and potentially affected communities should have broad access to information which clearly sets out the risks and also the justification for the project.

We are equally concerned that to date, there is no guarantee that SMRs will be subject to impact assessment under Canada's new environmental assessment law, the Impact Assessment Act. SMRs must undergo environmental assessments. We must consider the sustainability of our actions and this can only be done through an environmental assessment, which relies on independent experts and involves the public in the decision-making process.

We also do not support a "flexible" or "graded" regulatory approach as it could result in the watering down of safeguards necessary to protect communities and the surrounding environment. Given the untested and uncharted territory of siting SMRs in remote and Northern communities (according to the SMR Roadmap), the highest degree of regulatory measures should be required. For instance, as the climate changes, the North is experiencing more frequent and more severe fires. This, coupled with the difficulty of reaching remote communities (ie. long distances, lack of roads, seasonal roads only) only further dictates why strict regulatory requirements and oversight is of utmost importance.

We are also alarmed that the CNSC would even consider the licensing of SMRs, given Canada lacks any long-term waste management facility. We are deeply opposed to the continued

production of nuclear waste and the CNSC's assumption that communities in Ontario are willing to accept even more waste, despite the dangers which it brings.

We ask the CNSC rescind this RegDoc. It is much too early to consider licensing when the public has not been consulted and Canada still lacks the capacity for long-term radioactive waste storage.

Sincerely,

Chris Rouse

New Clear Free Solutions