



**Written submission from the
Council of Canadians, Avalon
Chapter**

**Mémoire du
Conseil des Canadiens, chapitre
d'Avalon**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022

March 22, 2022

To: Canadian Nuclear Safety Commission interventions@cnsccsn.gc.ca

Re: Intervention PLNGS Hearing Ref. 2022-H-02

Please consider this email my written intervention to the Canadian Nuclear Safety Commission, regarding the licence renewal of the NB Power Point Lepreau Nuclear Generating Station.

I am a retired university professor and research scientist. My first degree was in physics (including courses in atomic physics) and my doctoral studies were in climatology and climate variability and change. As a student in the 1960s, I was well aware of issues related to nuclear weapons testing, atmospheric fallout, radioactive contaminants, and of course nuclear power. I retain those interests and, as we live in an ever more dangerous world, those interests have developed into deep concerns.

In this instance, I am writing as a citizen of Newfoundland and Labrador and on behalf of the **Avalon Chapter of the Council of Canadians**.

Developments in the energy sector are taking place against the background of a dramatically changing climate. In Atlantic Canada we are experiencing higher air and ocean temperatures and more frequent and intense tropical and mid-latitude cyclonic storms. Of particular concern is the threat of rising sea levels to coastal environments and near-shore infrastructure (R. J. Daigle, Updated Sea-Level Rise and Flooding Estimates for New Brunswick Coastal Sections Based on IPCC 5th Assessment Report, 2020: <https://www2.gnb.ca/content/dam/gnb/Departments/env/pdf/Flooding-Inondations/SeaLevelRiseAndFloodingEstimates2020.pdf>).

As well, we cannot ignore recent geopolitical events that have security implications for our nuclear infrastructure and operations.

A licence extension takes place in the context of operational and external uncertainty. Prudence and the Precautionary Principle argue for a realistically short time horizon. Decisions against extensions for aging nuclear reactors have precedents elsewhere, (R. Cavanagh, 2022, <https://thebulletin.org/2022/03/why-the-retirement-of-a-california-nuclear-plant-should-proceed-as-planned/>).

For these reasons, among others, **we oppose NB Power's request for a 25-year extension to their operating licence for the Point Lepreau Nuclear Generating Station**. Rather, we argue for the current practice of a 5-year licencing interval to continue.

Please acknowledge receipt of this email.

John D. Jacobs PhD.
St. John's NL