



**Written submission from
Stephen Mahler**

**Mémoire de
Stephen Mahler**

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

FROM: Stephen Mahler
Sent by email on March 10, 2022

Subject line: Intervention PLNGS Hearing Ref. 2022-H-02

1. Limiting public input

NB Power's request to renew the licence of PLNGS for 25 years would effectively prevent any public input during the remaining life of the station.

A lengthy renewal at a time when there are so many uncertainties that could affect the station's safety, reliability and financial viability, would show a flagrant disregard for the public interest. It is critical that there be regular, timely opportunities to input the evolving needs and concerns of upcoming generations in New Brunswick.

NB Power's request to renew the licence of PLNGS for 25 years would effectively prevent any public input during the remaining life of the station.

A 25-year licence means that we will have no chance to have our say again until 2047!

The Bay of Fundy is one of the natural wonders of North America. We already know that the Lepreau nuclear plant is killing fish in the Bay due to entrainment from the water intake. A 25-year licence period may decrease the amount of regular assessments of the decline in marine health.

The Lepreau nuclear plant emits radioactive tritium, a carcinogen, into air and water. Canada's current "safe" limits for tritium are many times higher than in other countries.

The Point Lepreau plant is a financial boondoggle. New Brunswickers may decide to close it down before 25 years.

Conclusion: The CNSC must not renew the operating licence for Point Lepreau power station for the requested 25 years. Instead, the CNSC should continue to consider 5-year relicensing periods, and work toward decommissioning.

2. Uncertain times and best management practices

This is a time of uncertainty as we face climate change and rapid technological advancement. The nuclear industry, in particular, is experiencing significant cost increases and lengthy delays in refurbishment and replacement of nuclear facilities. At the same time, the costs of alternate sources of power and energy efficiency are falling.

The Lepreau station has a history of reliability issues:

Electricity production at Lepreau has not met production targets, in the first seven and a half years since a disastrously long and over-budget refurbishment, requiring an additional \$500 Million in capital expenditures.

The most recent unplanned outage, only 11 weeks after a two-month planned maintenance, was 40 days in January and February 2021 during peak demand.

The pace of the reactor's aging and the emerging reliability and costs of operation, need to be regularly shared with the public in a relicensing format, to allow input on decisions about continued operations, in the public interest. Those decisions will include committing to expenditures required for Lepreau, versus investments in alternate sources of power.

Conclusion: In the interest of ensuring flexible, responsive, publicly-sanctioned decision-making for such uncertain times, the CNSC must not renew the operating licence for Point Lepreau power station for the requested 25 years. Instead, the CNSC should continue to consider 5-year relicensing periods, to ensure regular public review allowing for public input to planning as patterns emerge, and before choices are forced.

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Stephen Mahler Thank you