

# NATIONAL COUNCIL OF WOMEN OF CANADA

(established in 1893)

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## **Re: Life Extensions of Nuclear Power Plants, Draft Regulatory Document G-360**

As a Vice President of the National Council of Women of Canada, with responsibility for environment, I am pleased to have the opportunity to comment on Draft Regulatory Document G-369, regarding the regulations around life extensions of nuclear power plants, on behalf of our President Carla Kosak.

National Council of Women of Canada (NCWC), which represents many thousands of Canadians from cities and towns across Canada, through its 19 Local Councils of Women, 5 Provincial Councils of Women and 24 diverse Nationally Organized Societies, has researched nuclear issues and developed strong policies related to public health and safety and environmental protection for over 50 years.

From this strong base we have commented on government legislation, regulations, programs and policies as they relate to nuclear issues - the most recent being our comments on Draft Regulatory Policy P-290, Managing Radioactive Waste ( August 14, 2003); the Elimination of "Insignificant" Nuclear Projects from the Canadian Environmental Assessment Act ( February 3<sup>rd</sup>, 2006); and, the Draft Scoping Document for Ontario Power Generation's Proposal for a Deep Geologic Repository at Kinkardin, Ontario (July 17<sup>th</sup>, 2006.) **In all of these comments we have stressed the need for a precautionary approach that protects the public and the environment over the very long term future.**

In this respect, NCWC finds Draft Regulatory Document G-360 quite weak. Our over-riding concern is that the regulations allow nuclear plant extension applications to avoid an automatic extensive assessment under the Canadian Environmental Assessment Act.

Instead, according to the CNSC back grounder of May /06, an EA "may be required."

This directive seems to be contrary to other information in the back grounder, which states that " *The CNSC expects the licensee to demonstrate that the following objectives are met for any life extension project: 1. The technical scope of the project is adequately determined through a Safety Improvement Plan that takes into account the results of an Environmental Assessment (EA)*" In the Glossary to the Draft Regulation page 15, an environmental assessment is described as " *An assessment of the*

*environmental effects of the project conducted in accordance with the CEAA and its regulations.”*

It is also of concern to NCWC, that an environmental assessment of the project may not be allowed by the CNSC if it meets the **“Exclusionary List requirements.”** As we stated in our comments of February 3<sup>rd</sup>, 2006,

***“ Expansions, restarts and refurbishments of aging nuclear plants are not insignificant. There are many potential dangers involved, to the workers, the public, and the environment.”...” An environmental assessment allows for close scrutiny of the risks involved and acts as a precautionary way to ensure public health and safety, as well as micro and macro-environmental integrity.”***

Further to this, even if the project undergoes an EA, the draft regulation does not guarantee public appraisal of the EA guidelines and EA Screening Report, or the EA process, rather saying that the public **“may”** be involved, as well as *“it is highly likely that life extension applications will be considered in the context of public hearings of the Commission...”* Given that the public is the most affected by the project, in both the long and short term, it is imperative that they be automatically allowed input

All of these problems with the draft appear to underline an unwillingness of the CNSC to consider itself as a vigilant protector of the public interest, but rather an facilitator for nuclear plant life extensions. In our view, this is backed up by CNSC actions over the past year or so, whereby the Point Lepreau, Gentilly 2 life extensions were guided towards approval without EA.s, and the Bruce Plant life extension was granted without an EA- **just prior to the deadline for public comment on this draft regulatory document G-360.**

These three approvals by CNSC have drawn questions and criticisms from knowledgeable environmentalists. For example, the Point Lepreau plant was excluded, using the exclusion list regulation, and it appears Gentilly-2 was allowed to go forward due to economic arguments made by Hydro Quebec. This latter, despite the fact that according to Greenpeace, the plant needed a major retubing, *“ which involves highly radioactive pressure tubes in the reactor core.”*

To conclude, the National Council of Women of Canada urges the Commission to strengthen G-360, so that all significant repairs and life extensions of nuclear plants are subject to Environmental Assessments under the Canadian Environmental Assessment Act and that the public is allowed input at all stages of the process. Only in this way may the public be assured that due diligence is done by the Commission, as the protector of the broader public interest in its health, safety and environment.

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