

April 19, 2005

Secretary, Canadian Nuclear Safety Commission
c/o Louise Levert, Commission Operating Officer,
CNSC, Ottawa, ON, K1P 5S9
Via Email: interventions@cnsccsn.gc.ca

Re: CMD05-H10: EA Guidelines for the Proposed Restart of Reactor Units 1 & 2 at the Bruce A Nuclear Generating Station and Extension of Projected Operating Life through to 2043.

April 19, 2005

Dear President and Members of the Commission,

Founded in 1982, Great Lakes United (GLU) is an international coalition of 170 organizations, labour unions, First Nations and Tribes. Our mission is to protect and restore the Great Lakes and Saint Lawrence River. I am writing today on behalf of member groups who have expressed grave concern that Bruce Power intends to return reactor Units 1 & 2 to service as suggested by CNSC staff initiation of an Environmental Assessment (EA).

Indications are that the proponent, a private consortium, is exploring the multi-billion dollar financial viability of rebuilding these 25-year-old reactors. The EA also calls for 2 more projects: (i) extending the operational life of the Bruce A reactors for an additional 38 years and (ii) the introduction of Slightly Enriched Uranium (SEU) to boost the output of these aging reactors. In our view, this tactic is a misuse of the Canadian Environmental Assessment Act (CEAA) since each project merits a detailed and independent assessment into environmental and safety impacts. We will therefore limit our comments to the rebuilding and proposed restart of the two reactors:

1. The delegating of the Assessment studies to the proponent precludes any expectation of objectivity and is reason alone for the Minister to call for a full Independent Panel Review.
2. Radiation resulting from the resumption of operation of these reactors must be measured cumulatively with that emitted by the refurbishment waste (including pressure tubes, fuel channels, steam generators, etc) for which extra care must also be taken to protect workers and the environment.
3. That CNSC staff has asked Bruce Power to propose the 'representative accidents' that will be considered in the Assessment (Pg.21 of CMD05-H10) is an affront to decades of CNSC staff regulatory experience and an abdication of staff responsibility to identify possible accidents involving CANDU reactors.

4. References (Pg.6, CMD05-H10) to the \$75 million dollar Nuclear Liability Act (NLS) ignore 30 years of inflation, more recent terrorist threats, and the increased rate of reactor wear historically realized.
5. The EA does not allow for consideration of alternatives or need.

Noting that both the proponent and the regulator's staff concede that risk is real, we are requesting you follow the recommendations of the International Joint Commission (IJC) to apply the Precautionary Principle to prevent harm to human health and the environment. Built on shore, as these reactors are, an accident or any continuous release of radiation during operations will contaminate not only Lake Huron but all points downstream - forever jeopardizing the drinking water on which tens of millions depend daily and the ecology of the world's largest freshwater resource.

With this risk in mind, why we are requesting that the Commission refer this project to the Minister of the Environment for an Independent Panel Review under Section 25 of the Canadian Environmental Assessment Act (CEPA).

We are also formally requesting herewith that time be reserved on the Hearing Agenda for our presentation of this submission.

Respectfully Submitted,



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