



Oral presentation

Exposé oral

**Written submission from
Judith Fox Lee**

**Mémoire de
Judith Fox Lee**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Application for a licence to construct one BWRX-300 reactor at the Darlington New Nuclear Project Site (DNNP)

Demande visant à construire 1 réacteur BWRX-300 sur le site du projet de nouvelle centrale nucléaire de Darlington (PNCND)

**Commission Public Hearing
Part-2**

**Audience publique de la Commission
Partie-2**

January 8, 2024

8 janvier 2024

From: Orm Lee
Sent: November 4, 2024 11:59 PM
To: Interventions / Interventions (CNSC/CCSN)
Subject: For the Public Hearing on January 8 2025

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

To Whom It May Concern,

This written intervention is regarding the application by Ontario Power Generation Inc. to the CNSC asking the Commission to consider and decide if constructing the first of four potential BWRX-300 reactors on the Darlington New Nuclear (DNN) site is legal and safe, according to the nuclear regulatory acts and laws. I do not believe it would be legal or safe as proposed, and I recommend that the Commission refuses to issue the Licence to Construct.

My name is Judith Fox Lee. I ask that you include my submission as part of the public record for this hearing. I do not wish to make an in-person intervention.

Here is my intervention-- much more summarized than my previous interventions, because I don't believe that all the serious intervenors' detailed remarks were sufficiently heard or considered by the CNSC. This time I will try to simply present the really big picture items, and hope and pray that some commissioners may start to hear these points even for a split second, and that it may start the growth of new considerations that could eventually lead to a rejection of this industry:

1. The last time I did submit a detailed intervention, written and orally presented, regarding the above ground burial mound so near the Ottawa River at the Chalk River site, I was so disappointed to witness that the entire exercise was a sham. The Commissioners seemed to have their minds made up and were simply going through the motions of appearing to listen and care. The entire exercise is designed to give credibility to a captured regulator which is much more a cheerleader for the nuclear industry than a body which honestly cares about safety of Canadians, our environment and the relative costs and safety of various methods of energy production. Please read on, as I am entirely and utterly serious about my concerns on how the CNSC as it is operating today. Embarrassing and irresponsible. I recommend overall, simply removing the word "Safety" from your title, the "Canadian Nuclear Safety Commission" - - Instead, simply use the title, "Canadian Nuclear Commission" Much, much more accurate, and so much less a contradiction in terms. Here are my further reasons why:

2. As a captured regulator, you cross-examine intervenors much more than you do to consider the applicants and their plans. For example, in the current case, the OPG has only submitted an interim design for the BWRX-300 reactor. Again, as with the above ground waste dump at Chalk River, the entire process feels rushed, and that the Commission is yet so willing to accept interim and incomplete plans. As I mentioned in my intervention that last time, in my tiny rural township, plans for approval of garage extensions must be much more detailed and completely finalized before being submitted for approval. How can the Commission think that being this lax is acceptable. For example, as noted in a recent Globe and Mail article about this application, it has been noted that "to address unresolved issues, CNSC staff proposed that the commission impose three "regulatory hold points" during the reactor's construction at which work would halt until OPG provided sufficient information to satisfy CNSC staff. Ramzi Jammal, the commission's executive vice-president and chief regulatory operations officer, would administer the hold points. Throughout an assessment

running more than 1,000 pages, published by the CNSC this summer, staff repeatedly noted missing information in OPG's submission that they vowed to review once it becomes available." This is a perfect example of what I personally call a 'sham' consideration. The OPG should be required to submit their application and proposal only if and when they have all the details tied down, and not altered during the pre-approved construction process.... This would never be acceptable in civilian life circumstances. Let alone for an industry which handles potentially life-altering nuclides at every stage with strategic dangers.

3. One Commissioner, Jerry Hopwood has stated publicly at the first hearing about the current OPG application, "In many cases, there is a discussion about a topic, and it's noted that the design is not complete. It's not entirely clear to what extent the design has been completed in such a way that the conclusions that support a licence to construct are then justified." The other Commissioners should take his statement and sentiment to heart and reject this current application. Send it back to the drawing board until completed.

4. Given the huge costs and projected overruns, and given the falling costs each year of alternative sources of energy production including solar, wind, hydro, tidal, co-generation, battery storage systems, and many more, Canada should give up its expensive, and unsafe nuclear power generation program. Flat out. Why mess with dangerous, radioactive substances when its clearly no longer necessary to meet our current and expected needs for power. There have been so many well documented nuclear accidents from the largest down to many, many smaller ones, that if this truly was a safety-focussed exercise, it would be run out of town.

5. Finally, the nuclear waste problem has yet to be solved by the industry's own top engineers for over 75 years of the nuclear age. They have NOT solved it. They are simply trying to bury it now, which needs to be done in a much better way than this current application does. It ignores the waste problem, which is a total cop-out. Canadians, if they knew the truth about nuclear waste for the ages, would not agree.

Apologies for the brevity of this submission, but more detailed and researched submissions do not insure more consideration .What i have outlined is what I request the commissioners to much more seriously consider than ever before.The world needs to move in the opposite direction. Reject this application or remove the word "Safety" from your name.

Yours truly,
Judith Fox Lee