



File / dossier : 6.01.07

Date: 2021-05-03

Edocs: 6555625

**Written submission from  
Kelly Clune**

**Mémoire de  
Kelly Clune**

In the Matter of the

À l'égard de

**Darlington New Nuclear Project**

---

**Projet de nouvelle centrale nucléaire de  
Darlington**

---

Application to renew the nuclear power  
reactor site preparation licence for the  
Darlington New Nuclear Project

Demande de renouvellement du permis de  
préparation de l'emplacement d'une centrale  
nucléaire pour le projet de nouvelle centrale  
nucléaire de Darlington

**Commission Public Hearing**

**Audience publique de la Commission**

**June 10, 2021**

**10 juin 2021**

May 3, 2021

Canadian Nuclear Safety Commission  
280 Slater St. Ottawa, ON K1P 5S9

Dear CNSC,

Re: OPG's request for another renewal at Darlington Nuclear Site

The purpose of this letter is to encourage CNSC members to adhere to the expiry date of April 17, 2022 for OPG's Nuclear Power Reactor Site Preparation Licence (PRSL) at Darlington New Nuclear Project (DNNP) Site, and to ask the CNSC to reject OPG's renewal application.

At some point the CNSC must recognize that those associated with pushing the nuclear agenda have a vested interest in consistent contracts which keep public finances flowing into new nuclear experiments, and into the pockets of nuclear lobbyists. Unfortunately, this process also reduces finances for truly sustainable and affordable green energy solutions.

However, the CNSC is not concerned with financial aspects of nuclear projects. Instead, its mandate is to "regulate" nuclear energy, share objective information with the public, and protect the health, safety and security of people and the environment.

Therefore, please acknowledge the following concerns and take action to protect human health and the environment by denying OPG's application to continue operations at Darlington Nuclear Site:

- This is a heavily populated area and operations at this site pose unnecessary risks to human health and the environment;
- Contamination from leaks onto ground and spills into lakes and rivers risk damage to underground water tables and accumulation of contaminants that can alter aquatic life and drinking water, now and into the future;
- Nuclear waste continues to accumulate during operations, with no sustainable plan now, or any consideration of dangers to future generations and the environment from the destruction caused by radioactive waste.

It is questionable whether the CNSC has the ability to be unbiased and to objectively review and oversee nuclear projects, given that close associates and colleagues of the CNSC are now employed by suppliers to OPG.

As you know, OPG has joined in a venture with "Ultra Safe Nuclear Corporation" (USNC) to construct Small Modular Reactor (SMR)'s for commercial use. According to a recent article, this 50/50 partnership between OPG and USNC was formed in mid 2020, yet the project, located at Chalk River, "has been ongoing for a number of years". (<https://www.manitoulin.com/first-of-its-kind-nuclear-project-all-about-creating-a-new-energy-solutio-in-canada/>)

Former President and CEO of CNSC, Mr. Binder, is now a lobbyist for his new employer as a USNC-Power Advisory Board Member. USNC-Power and OPG recently formed another joint venture, referred to as Global First Power (GFP), which aims to implement USNC's plans at Atomic Energy of Canada Limited's (AECL's) Chalk River site, managed by Canadian Nuclear Laboratories' (CNL).

This conglomeration of nuclear proponents has been busy behind the scenes for years ignoring the glaring issue of nuclear waste and other concerns raised by citizens. In fact, nuclear contractors have been strategizing ways to sell their technology well in advance of public awareness or approvals.

The seeds of deception are planted early in the process according to USNC-Power's Vice President of corporate development, Mr. Ken Darlington. He explains, in the above article, how the process works, **"It's about making First Nations and Indigenous peoples part of the process and offering them real opportunity beyond being a beneficiary of the project but potentially having economic benefits as well."**

By selling the science-fiction science of nuclear power to vulnerable communities, people are being groomed to forgo environmental safety for empty "promises" of employment, and other unspecified "economic benefits".

The CNSC must not stand by while nuclear industry stakeholders advertise claims about its technology on the basis of subjective scientific and technical information.

The CNSC's mandate is to protect the public. This requires the CNSC to prevent corporate stakeholders from disseminating reports without objective scientific research and discussion. It requires the CNSC to be unbiased and to share unedited reports with the public in a timely manner, for review, open debate, consideration and input by all interested parties.

Regrettably, the absence of an energy policy in Ontario has allowed their nuclear agenda to precede with impunity. The CNSC needs to accept that our economy, and our survival, depend on the environment.

The public expects the CNSC to protect people and the environment. This requires the CNSC to review and evaluate all aspects of nuclear technology, including emissions associated with uranium extraction and transportation, environmental degradation from mining, daily operations, contamination and spills, and the dangerous mess associated with ever-growing accumulations of radioactive nuclear waste.

The CNSC must not be compromised by special interest lobbyists. History shows that the CNSC consistently provides generous rulings for the nuclear contractor industry. This time it is critical that the CNSC fulfill the mandate to protect people and the environment and deny OPG's renewal application for a PRSL at the Darlington Site. Further, the subliminal nature of the SMR project, under the shadow of this Darlington renewal application, cannot be ignored. This is a dangerous and unproven technology. It is feasible that OPG and its new partner USNC, and/or GFP, under the guise of "operating as usual" at the Darlington Site, will seek an opening to construct a "SMR pilot project" there.

Is it possible for the CNSC to actually deny any OPG application? Now is the time for the CNSC to act on its' mandate and refuse this renewal application.

We citizens of Canada wait with great anticipation to learn if the Commission is able to divert from its' historical pattern of ruling favourably for OPG and finally reject one of OPG's applications.

Kelly Clune