



**Written submission from  
Kelly Clune**

**Mémoire de  
Kelly Clune**

In the Matter of the

À l'égard de

**Ontario Power Generation Inc. -  
Darlington Waste Management Facility**

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**Ontario Power Generation Inc. - Installation  
de gestion des déchets de Darlington**

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Application to Renew the Class IB Waste  
Facility Operating Licence for Ontario Power  
Generation in Darlington, Ontario

Demande de renouvellement du permis  
d'installation de déchets de catégorie IB pour  
Ontario Power Generation à Darlington  
(Ontario)

**Commission Public Hearing**

**Audience publique de la Commission**

**January 26, 2023**

**26 janvier 2023**

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**From:** Kelly Clune  
**Sent:** December 5, 2022 9:09 PM  
**To:** Interventions / Interventions (CNSC/CCSN); Interventions (CNSC/CCSN)  
**Cc:** Prime Minister/Premier Ministre; Premier of Ontario | Premier ministre de l'Ontario; Ministre / Minister (EC); Mike Schreiner-CO; tabunsp-qp@ndp.on.ca; jugmeet.singh@parl.gc.ca; Federal Green Caucus; Charlie - M.P. Angus  
**Subject:** Re: OPG's renewal application for operating license at Darlington Waste Management Facility.

Dear President Velshi and Members of the Canadian Nuclear Safety Commission,

Re: OPG's renewal application for operating license at Darlington Waste Management Facility.

Once again, OPG has before you a renewal application for an operating license at Darlington Waste Management Facility. Although, I have no doubt that the CNSC will rubber stamp OPG's request, I submit the following two comments for consideration:

1. Re: OPG's proposal to construct two nuclear waste dry storage buildings immediately adjacent to Lake Ontario.

Since the plan is to store nuclear waste in buildings beside Lake Ontario, I expect the CNSC will require these buildings to be constructed beyond standard building codes. It is important that these buildings be fortified to ensure that the nuclear waste stored there is barricaded in to reduce potential spills into the ground/lake. Also, additional features to protect the buildings from extreme weather conditions and terrorist attacks would offer further important safeguards to the air, land, water, and living creatures.

2. Re: OPG's request to rename the Darlington Waste Management Facility.

Putting lipstick on a pig doesn't change anything, it's still a pig!

OPG's attempt to justify a name change to the facility is not only ridiculous, but fraudulent. It is greenwashing! It is intended to mislead the public.

OPG claims a name change is necessary because the public has a negative perception of nuclear waste. True, the public understands that nuclear energy is dangerous to people and the environment, and no one wants nuclear waste anywhere near them!

It seems that OPG has already prepared a marketing message for its new name, claiming it is "both true and inspirational" - a name that "demonstrates that nuclear energy is clean energy" with a focus on "safety and protection of the public and the environment, *NSS* demonstrates good stewardship of nuclear by-products, while developing lasting solutions for disposal, and ensuring public peace of mind".

It is deceptive for OPG to claim that nuclear energy is "safe". It is dishonest for OPG to suggest they are "developing lasting solutions to disposal". The truth is, OPG has no disposal solutions for nuclear waste. It is only stored, which is not a solution. Of course, the word "developing" probably allows OPG to claim it is continuing to work on developing those "lasting solutions" to nuclear waste disposal. Again, this is deception, since nuclear waste can remain hazardous to land, air, water and all living things for tens of thousands of years. Therefore, OPG will likely be in the development stage forever.

If OPG is seeking a better public image and public peace of mind, being deceptive and dishonest with the public will not bring about successful results. The public deserve factual and truthful information.

The truth is, OPG operates a nuclear generating facility at Darlington and nuclear wastes are “managed” there. It is what it is.

The truth is, if nuclear waste were as safe as nuclear proponents often claim, there would be no need for OPG to be so secretive about it. It wouldn't be necessary for OPG to greenwash the project.

I disagree with CNSC staff that the name change is merely "*administrative change and has no impact on the activities authorized in the licence or CNSC regulatory oversight of the waste management facility.*" While the name change may not impact CNSC in anyway it would influence public perception, which is why OPG wants to change the name. It is misleading to the public.

Is it not CNSC's role to disseminate information to the public? The name of a facility is important and must clearly indicate what the facility is. This informs people about the operations of the facility, and the fact that nuclear waste is stored there in their community, beside the lake. People have the right to this information.

Further, a name change is an unnecessary “administrative change”. Certainly OPG must have more important things to spend time and money on than changing the name of the facility?!

If a name change were necessary, which it isn't, the people of Ontario should decide on a new name. After all, it is the people of Ontario who have to live with the consequences of the facility, and who would be responsible for financing any name change.

OPG should not be allowed to change the name of the facility!

Awaiting your reply,

K. Clune