



**Written submission from
Christine Drimmie**

**Mémoire de
Christine Drimmie**

In the Matter of the

À l'égard de

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

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

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

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From: Christine Drimmie
Sent: December 5, 2022 11:38 PM
To: Interventions / Interventions (CNSC/CCSN)
Subject: Application for renewal of Licence for the Darlington Waste Management Facility (DWMF)

Dear Senior Tribunal Officer,
Commission Registry Canadian Nuclear Safety Commission

Based on review of OPG's application I wish to raise with the commissioners the following points and questions as a written submission. It is not my intent to make an oral submission:

1. OPG's application states that the function of the DWMF is for the safe processing and storage of used fuel and intermediate level waste from the DNGS refurbishment project. They are moving, packaging, storing two types radioactive waste and maintaining it in a safe condition within these facilities. This is the activity being licensed. Why then, would an organization that claims to follow a practice of openness and transparency in their communications with the public seek to rename the facility in a way that completely obscures this function. Renaming will also make it more difficult for future citizens and observers of the management and licencing of the facility to track decisions related to it. The proposed new name "Nuclear Sustainability Services - Darlington" only serves to obscure from public awareness, the actual activities being carried out under the licence within the facility. The facility has a good safety record and so why is OPG afraid to have the public know what they are doing? In fact, to be more consistent with CNSC and federal radioactive waste policy the facility should likely be called a "radioactive waste storage facility". The shift to calling it a structure rather than a facility also seems unnecessary. **Therefore, the renaming of the facility should not be permitted as it seems to be largely a move to hide from the public what is happening at this facility.** The renaming of the corporate division also weakens the clarity of accountability for radioactive waste management to an outsider trying to figure out who is in charge. The link to OPG's sustainability plan is tenuous at best.
2. Storage is characterized as "interim" without any definite time limit. 2043 is proffered as the date at which waste *may* begin to move. The submission contains no indication of future planning for the physical facilities and activities that will be needed to support the repackaging and removal of the radioactive waste to a permanent disposal site. The cancellation of the DGR planned for Low and Intermediate level waste at Kincardine does not bode well for the on-time completion of the proposed used fuel DGR. The lack of a finalized updated federal policy on radioactive waste means that we really don't know what direction will be. As a Durham resident, I have no faith that the waste will ever be moved, certainly not in my lifetime. **If OPG does believe removal will occur, when will they begin planning the process and structures for it?**
3. Given the uncertain future of the waste, **why does the CNSC continue to allow OPG to create these storage facilities directly on the Lake Ontario shoreline, next to the drinking water source of millions of Ontarians and US residents?** Politics being what they are today, I don't think we can count on the so-called "institutional controls" that currently keep it safe lasting indefinitely.
4. Please ask OPG and or the Province of Ontario to **explain how the host Region and municipalities are being compensated for the existence of these facilities in their community as compared to any other industrial activity?** What is the assessed value of each storage building? On what basis are these facilities assessed? How

much property tax and proxy property is paid to the city, region and Province for these storage facilities? **As a resident who has KI pills in my kitchen cupboard, I would like to know whether the burden our community bears for storing this material, which is the result of energy generation that benefits the entire province, is worth it, at least financially?** I seek this transparency from OPG, as a shareholder (it is Ontario crown agency and I am an Ontario resident) and energy ratepayer. If our community is expected to support the ongoing nuclear operations and creation of waste I would like to know exactly how it is benefiting in tax terms. The tax benefits of the good jobs created are terrific but they accrue only to the federal and provincial coffers through corporate and income taxes. This does not help a municipality provide services.

5. OPG's submission indicates that this application doesn't trigger the duty to consult even the Indigenous community but they are in regular contact. They claim to be in regular contact with the municipalities as well. **How often in the past 10 years, OPG has made a presentation to Durham Regional Council or Whitby Council on waste management issues?**...the Durham Nuclear Health Committee is not a substitute for Regional Council or local councils - no Councillors sit on that committee. This is about accountability to our elected officials.
6. **When will the planning for the waste management facilities for the new Darlington SMR begin? Where will it be? Will that facility simply be rolled into this group of "structures" and never "trigger any consultation"?**

In the interests of public transparency and accountability, I challenge the Commissioners to seek clear public responses to these questions but based on experience, I suspect they will be sloughed off as "out of scope", to the benefit of those who are experts on the rules. Despite this, I appreciate the opportunity to comment.

Christine Drimmie