

CMD 23-M36.12A

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Supplementary Information

Renseignements supplémentaires

Presentation from the Nuclear Transparency Project

Présentation du Projet de transparence nucléaire

Regulatory Oversight Report for Canadian Nuclear Power Generating Sites: 2022 and Mid-term update for Ontario Power Generation's Pickering Nuclear Generating Station Rapport de surveillance réglementaire des sites de centrales nucléaires au Canada : 2022 et Rapport de mi-parcours d'Ontario Power Generation pour la centrale nucléaire de Pickering

Commission Meeting

Réunion de la Commission

December 13 and 14, 2023

13 et 14 décembre 2023





Submissions from the Nuclear Transparency Project

Re: 2022 Regulatory Oversight Report for Nuclear Power Generating Facility

Pippa Feinstein, JD LLM

NTP Coordinator

CNSC Public Meeting – December 13, 2023



presentation roadmap

- About NTP
- Part One: Opportunity to include more information and context in the ROR
- <u>Part Two</u>: The need for CNSC oversight over new methods of data disclosure by licensees
- Part Three: Procedural aspects of the ROR
- <u>Part Four</u>: Concerns over the Pickering Nuclear Generating Station's midterm licence update



<u>Part One</u>: Opportunity to include more information and context in the ROR

- Missed opportunity:
 - CNSC staff discussions in this ROR do not reflect the amount of environmental data that several licensees in this category release
 - RORs for Uranium Mines and Mills and Uranium and Nuclear Substance Processing Facilities illustrate how this can be better done
- More context for discussions in ROR sometimes required
 - E.g. the significance of tables and descriptions of maintenance work is difficult to understand

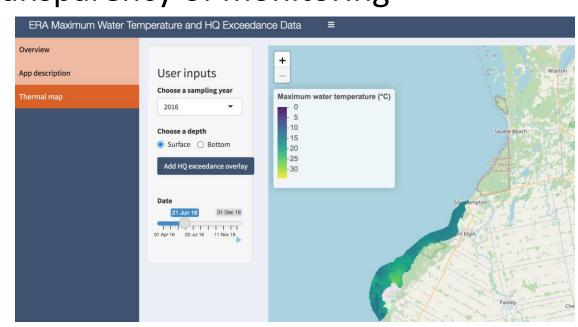


Part Two: The need for CNSC oversight over new methods of data disclosure by licensees

• As formats for data disclosure change with the emergence of new technologies (e.g. GIS apps), transparency of monitoring

methodologies is crucial







Part Three: Procedural aspects of the ROR

- Grateful for more time to prepare for review before ROR released
- Request resumption of oral submissions by intervenors during ROR meetings
- Request review of funding criteria for Participant Funding Program



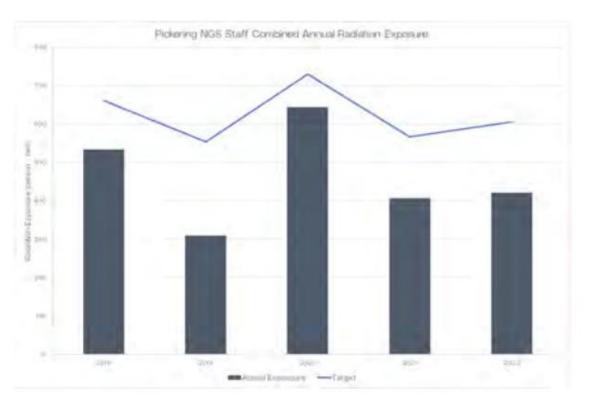
Part Four: Concerns over the Pickering Nuclear Generating Station's midterm licence update

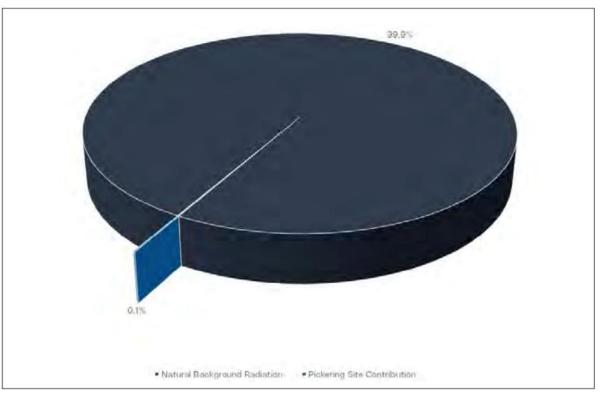
- Context: mid-term licence updates for benefit of public due to longer licence terms
- NTP concerned over poor quality of information in these updates:
 - Illegible graphs
 - Graphs displaying data with no sources or with no context



Part Four: Concerns over the Pickering Nuclear Generating Station's mid-term licence update (cont'd)

• Examples from OPG CMD:





RADIOACTIVE DOSE RELATIVE TO NATURAL BACKGROUND RADIATION 2022



Part Four: Concerns over the Pickering Nuclear Generating Station's midterm licence update (cont'd)

- More information and data should be shared
- Need more time for mid-term licence reviews (6 − 12 months)
- Mid-term licence reviews should not be tacked onto RORs
 - Should be separate meeting held in community



Thank you.