



**Written submission from
Christine Drimmie**

**Mémoire de
Christine Drimmie**

In the Matter of

À l'égard d'

Ontario Power Generation

Ontario Power Generation

**Ontario Power Generation – Application to
change the licensing basis for the Pickering
Waste Management Facility**

**Ontario Power Generation – Demande
visant à modifier le fondement
d'autorisation de l'installation de
gestion des déchets de Pickering**

Public Hearing – Hearing in writing based on
written submissions

Audience publique – Audience fondée sur
des mémoires

June 2024

Juin 2024

June 6, 2024

Dear Senior Tribunal Officer,
Commission Registry,
Canadian Nuclear Safety Commission (CNSC)
Email: interventions@cnsccsn.gc.ca

Please find below my comments on Ontario Power Generation's (OPG) application to change the licensing basis for the operation of the Pickering Waste Management Facility (PWMF).

CNSC staff has recommended that the Commission:

Amend the PWMF licensing basis to authorize OPG to process and store a maximum of 100 DSCs containing a minimum of 6-year cooled fuel at PWMF.

My understanding from the documents provided by OPG is that the change requested from storing 10-year cooled fuel in dry storage containers (DSCs) to storing 6 year-cooled fuel, is driven by operational needs. Their confidence in making this change is based on studies done in 1998 with findings that showed negligible effects on the relevant Safety and Control Areas.

Given these findings, I have several questions to OPG and the CNSC:

1. Why wait all these years to make this change? Why was the licence condition held unchanged at 10 years since 1998 despite the finding that 6 years was "safe"? What was the original basis for the 10-year cooling requirement and what if anything has changed to make 6 years acceptable now?

I speculate this request must be linked to the Province's announced plans to refurbish Pickering Units 5 to 8. Clearly that would require defueling all four reactors after the service extension to 2026 (which itself is still subject to approval). If the larger refurbishment is approved, then defueling would become "urgent" in the effort to move the project along to meet growing electricity demand. What project is the request to transfer 6 year-cooled fuel to DSCs actually supporting? Perhaps I missed this in information in the lengthy supporting documents.

2. While this CNSC decision is described as a small change to the licence conditions for a single plant, requiring only a written hearing, it has potentially broader implications. Will 6 years in irradiated fuel bays become the new standard for all of OPG's plants? What is the impact of that change at other sites like Darlington and Bruce? Will the construction of additional used fuel storage buildings suddenly be required? How much space is available at each site to accommodate additional buildings into the future? Not one used fuel bundle has yet moved offsite from any Ontario nuclear plant to long-term "disposal" and the timeline for readiness of a Deep Geological Repository (DGR) is far from assured and increasingly distant.

Refurbishment to extend the life of any of the nuclear plants means more used fuel will be generated. Host municipalities and Indigenous communities have a vested interest in decisions relating to the treatment of the fuel in the interim and long term. An obvious question is how much will be stored and how long the “interim” storage will continue at the host sites. The communities affected deserve a clear answer, not one that dodges the question by diverting it to the NWMO where they will receive vague assurances about “Canada’s plan” for the DGR to be operational in the mid-2040’s. In the context of Pickering, when is the first date that used fuel waste will leave the site? How many years will it take to remove it all?

3. Does an approval of this change establish a precedent for future licences and other facilities? If so, it is another example of the fragmented decision-making that is, in my view, a key flaw of the CNSC regulatory process. This decision potentially sets the stage for new storage demands in other host communities that may have not have been consulted or realized the consequences of this “minor” change at PNGS. If OPG is granted the requested change for the duration of this PNGS licence, will it automatically be sought by the generators as the new norm in any future licensing decisions? What is the impact at the PNGS site if refurbishment proceeds? How many new storage buildings would be required and when? Will the CNSC require a broader consultation to examine the consequences of this new licence condition for host communities, particularly in view of the slow progress on development of a DGR?
4. How is it that a decision to change the licence condition can be made shortly after this hearing when OPG must provide an addendum on the results of the initial trialing of the DSCs containing minimum 6-year cooled fuel, perhaps not until September 30, 2024? It would seem more reasonable that the decision would only allow the amendment to the licencing basis contingent on:
 - a. the results of the tests of loading and observing a number of DSCs for 6 months that demonstrate safe handling and conditions for those trial DSCs;
 - b. completion of a satisfactory reverse loading procedure for the DSCs; and
 - c. a limitation specifying that this change applies only to the current licence period and will not be automatically roll over into future licences without a broader discussion with all affected communities (e.g., municipalities, Indigenous communities and rights holders).

With respect to local public consultation on this matter, I listened to the presentation by Mr. Aggarwal, VP, Nuclear Sustainability Services at OPG to the Durham Nuclear Health Committee on April 21, 2024. While he spoke about the change to put 6-year cooled fuel in DSCs, he did not frame it as something on which OPG was seeking DNHC or public input. It was presented more as a fait accompli than an upcoming decision. While committee members might have understood that a hearing was taking place on this change, certainly a member of the public who had tuned into the meeting would not

have gathered that information. If the DNHC is considered a key channel to Regional Council and to engage the broader Durham public, matters such as the opportunity (or invitation) to provide comments should be more explicit. I also saw no reference to the hearing or the opportunity to comment in the Neighbours Winter 2024 newsletter. Is this adequate public consultation by OPG?

Thank you for your consideration. If the Commission can seek clear, understandable answers to these questions for the public, it would be appreciated.

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