



**Written submission from  
Susan O'Donnell**

**Mémoire de  
Susan O'Donnell**

In the Matter of the

À l'égard d'

**Ontario Power Generation Inc.**

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Applicability of the Darlington New Nuclear Project environmental assessment and plant parameter envelope to selected reactor technology

Applicabilité de l'évaluation environnementale et de l'enveloppe des paramètres de la centrale à la technologie de réacteur sélectionnée pour le projet de nouvelle centrale nucléaire de Darlington

**Commission Public Hearing**

**Audience publique de la Commission**

**January 2024**

**Janvier 2024**

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**From:** Susan O'Donnell  
**Sent:** November 17, 2023 5:10 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** Darlington New Nuclear Project environmental assessment and plant parameter envelope

Friday, November 17, 2023

Commissioners,

I submit these brief comments on whether the Darlington New Nuclear Project environmental assessment and plant parameter envelope should be applied to the selected reactor technology.

Although I live in New Brunswick, I'm intervening in this Ontario project because I'm concerned about the lack of independent scrutiny of proposed new nuclear reactors in Canada. You may be aware that attempts were unsuccessful to have the first New Brunswick small reactor undergo Impact Assessment, despite the fact that it is a novel design that deserves serious scrutiny.

The BWRX-300 is also a novel technology – effectively an experiment – with many unknowns at this stage. Many intervenors in this hearing will raise the specific technical concerns with this project. An environmental assessment would not only examine these concerns but also help to raise public awareness of this project and trust in the regulatory process.

The optics are very poor on OPG's claim that a generic environmental assessment approved years ago could be magically re-configured to apply to a novel nuclear technology that was not envisioned years ago. Frankly, if their application is approved, it will appear to be an abdication of duty by the CNSC that will further erode its credibility and the trust the public has in its ability to ensure the safe and secure development of new nuclear technologies.

Thank you for considering this intervention. I will continue to follow the development of this project through the regulatory stages but will not be making an oral intervention at this point.

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