



Supplementary Information

Presentation from Christine Drimmie

In the Matter of the

Ontario Power Generation Inc.

Application for a licence to construct one BWRX-300 reactor at the Darlington New Nuclear Project Site (DNNP)

Commission Public Hearing Part-2

January 8-10 and 13-14, 2025

Renseignements supplémentaires

Présentation de Christine Drimmie

À l'égard d'

Ontario Power Generation Inc.

Demande visant à construire 1 réacteur BWRX-300 sur le site du projet de nouvelle centrale nucléaire de Darlington (PNCND)

Audience publique de la Commission Partie-2

8-10 et 13-14 janvier 2025



COMMENTS RE: OPG LICENCE TO CONSTRUCT APPLICATION

Related to CMD 24 H3.11 by C. Drimmie
January 2025

KEY QUESTIONS/ISSUES

- Changed community, different project, different time, but no new EA, no big questions asked
- Fragmented licencing process does not take a long-term view of community impacts
- No meaningful community discussion of life cycle impacts of building 4 SMRs
- Is this a pattern/precedent for other SMR hosting situations, agreements?
- Construction opportunities
- Upfront facts about fate of used fuel and onsite waste storage
- Evidence of OPG's Qualification for Decommissioning and Dismantling

NO NEW EA, FRAGMENTED LICENCING PROCESS

- Now, a much larger community, different project, new social and economic conditions, but no new EA
- EA review was narrow and technical, not meaningful or engaging for the current community
- No BIG questions asked about the project.
 - Is this the right nuclear project NOW given Ontario's energy needs per recent IESO demand forecast?
 - Does the current community support it?
- CNSC process seems a poor fit with UNDRIP requirements of free, prior and informed consent, Indigenous knowledge approach, seven generations considerations.

COMMUNITY IMPACTS OF CONSTRUCTING THE SMR

- With no new EA process, how/when will current community hear about the long-term impacts of a decision to construct?
- At this stage, OPG stresses the positive economic impacts of technology development, construction and operational phases of the project.
- CNSC process deals with less positive impacts of the facility life cycle much later.
- Residents deserve facts, straight answers about the **net and shifting economic impact** over the 100 year life cycle – who benefits and when?
 - Taxes paid to municipalities compared to the Province
 - Ongoing need for emergency preparedness and burden to monitor and participate
 - Impact of eventual closure on local economy
- Will this process set the desired example of host community relationships to support broader SMR deployment?

CONSTRUCTION OPPORTUNITIES

- Green Standards : How will construction emissions be reduced, offset?
- Are co-benefits possible? Will cooling water be used for district heating rather being dumped in the lake?
- Will isotope production be an option?
- Will solar opportunities be exploited on large structures or parking areas?
- Can a natural solution replace shoreline hardening?

USED FUEL & RADIOACTIVE (RA) WASTE

- Be clear and candid now about:
 - The accumulating quantity of used fuel and RA waste storage needs (wet, dry, refurbishment, interim, final)
 - The amount of time RA waste is likely to be on site including the wastes left from dismantling the plant
 - The anticipated earliest date any used fuel is likely to be moved from the site
 - Plan B if the waste cannot be removed because there is no licensed facility
- These are the consequences of granting a licence to construct and should be answerable now, before approving a new facility.

DECOMMISSIONING AND DISMANTLING

- The logical outcome of a decision to construct is an eventual requirement to decommission and dismantle.
- What is the evidence that OPG is competent and qualified to fully implement either of these processes?
- Is the community aware of the duration and outcome of these processes? This information also should be provided to the public now, in clear terms.
- Legal agreements with host municipalities and Indigenous rights holders signed before construction begins should ensure their say in the long-term fate of the site (among other commitments).

Thank you/Merci