



**Supplementary Information
from the Regional
Municipality of Durham**

**Renseignements supplémentaires
de la Municipalité régionale de
Durham**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

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

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

**Commission Public Hearing
Part-2**

**Audience publique de la Commission
Partie-2**

January 8-10 and 13-14, 2025

8-10 et 13-14 janvier 2025

Supplemental Information to the Commission from the Regional Municipality of Durham
Ontario Power Generation Inc. - Application for a licence to construct one BWRX-300 reactor
for its Darlington New Nuclear Project (Part 2)

Friday, January 10, 2025

As highlighted in Durham Region's presentation, OPG provides funding through agreements with the Health Protection Division for the Potassium Iodide (KI) Program (up to \$260,000 annually¹) and the Emergency Management Division (up to \$987,000 annually²), however, many critical functions that contribute to the Region's emergency readiness for nuclear emergencies are delivered by employees and divisions outside of these work areas and are unfunded. This includes the cost associated with hundreds of staff participating in annual training and exercises as well as the major exercises at each Darlington and Pickering every three years. While plans are in place to ensure compliance with the Provincial Nuclear Emergency Response Plan (PNERP), the Region has concerns about our capacity to operate multiple evacuation centres and reception centres in the unlikely event of a nuclear emergency.

During the questioning period, Randy Reid, Director, Nuclear, Radiological and Scientific Response Programs, Emergency Management Ontario (EMO), indicated that the province is undertaking improvements to the Emergency Management and Civil Protection Act and the Provincial Nuclear Emergency Response Plan. This legislation and plan assign significant responsibilities to municipalities without commensurate funding. While Durham Region supports the enhancement of emergency management in Ontario, we anticipate that these amendments will add additional financial impacts to municipalities. Modernized emergency management legislation requires a modernized funding structure.

In 2024, EMO introduced a funding stream of up to \$50,000 annually for nuclear host communities. To clarify, EMO characterized this as a transfer payment, but it is a grant program with restrictions on what the funding can be used for and how the funding is released. The funding is also not reliable, often with delays in the program. While the Region is calling for additional funding of host communities, this limited funding does little to remedy the millions of dollars in annual expenses borne by Durham Region taxpayers as a result of being a nuclear host community.

Municipalities lack the resources and capacity to continually negotiate with industry as our legislated and mandated responsibilities expand over the lifecycle of nuclear facilities. While direct negotiations with industry partners can work, the current system places an unsustainable burden on host communities, resulting in inconsistent support for municipalities as Mayor Foster (Municipality of Clarington) emphasized during his delegation before the Commission on January 9. We need systematic reform that shifts this responsibility away from resource-constrained municipalities.

That's why we're advocating for a comprehensive review of the financial arrangements between nuclear operators, the province, and host communities resulting in changes that would remove the financial burden from municipalities and ensure future host communities have sustainable funding

¹ Per MOU between OPG and Durham Region Health Department, 2022 - 2026

² Per MOU between OPG and Durham Region Emergency Management Office, 2019-2024

frameworks from the start. This would ensure that municipalities are adequately resourced to maintain robust emergency response programs and enhance our ability to respond effectively to a nuclear incident.

We would also like to take this opportunity to provide the Commission with additional information regarding questions posed to the Region:

Should a non-nuclear emergency occur on-site related to construction activities under the Licence to Construct for the Darlington New Nuclear Project, Durham Region's emergency services, including the Durham Region Police Department (DRPS) and Region of Durham Paramedic Services (RDPS), are prepared to respond as required.

With respect to the question regarding environmental monitoring, Durham Region hosts air quality monitoring stations and shares monitoring and modelling data related to water quality with OPG. A comprehensive water sampling protocol is in place, with collections occurring twice per day for OPG testing. These samples are picked up by OPG at least monthly, while a single daily sample is combined into a weekly composite for submission to the Ontario Ministry of Labour. In the event of a radioactive liquid emission (tritium release), plans are in place for enhanced monitoring and implementation of precautionary measures, up to and including the restriction of human consumption of tap water as required.

With respect to the question regarding public health impacts, Durham Region has participated in consultations and webinars hosted by OPG, as well as received presentations through the Durham Nuclear Health Committee. Based on the information presented in the studies in support of the Darlington New Nuclear Project, such as the Environmental Assessment (2009) and Environmental Impact Study Review (2023), Durham Region has not been informed of any anticipated impacts. Durham Region will continue to review EA follow up activities OPG has in place to verify predictions of environmental effects identified in the EA, to ensure mitigation of any potential public health impacts.

We appreciate the opportunity to provide supplemental information. If there are any additional questions about Durham Region's intervention, please contact Caitlin Rochon, Manager, Corporate Initiatives, caitlin.rochon@durham.ca.