



**Written submission from
Mary Ludwig**

**Mémoire de
Mary Ludwig**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

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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 2025

Janvier 2025

I stand in opposition to any further expansion of nuclear power generation for the following reasons:

The BWRX - 300 is unproven, and there are still none in operation.

Adding new reactors is far too costly and predictably have large cost-overruns during construction. Nuclear is still the most expensive way to generate electricity.

The time taken for completing construction and getting new reactors online is far too long to offer any solution to the changing climate.

Radioactive waste is the main product of nuclear power generation, and all reactors produce it. The proposed and very contentious DGRs proposed to manage it are a best practices guess, and involve long distance transportation of radioactive wastes. A very bad management choice.

Regulatory bodies responsible for giving the go ahead on projects such as this one, include members with intimate connections and past experience with the nuclear industry. A strong bias in favour of industry proposals does not result in fair representation of public concerns.

Mining of the uranium in Canada has resulted in worker illness and death, and environmental contamination due to inadequate separation of tailings from natural systems - water and soil. Mining and refining the uranium has impacted communities like Elliot Lake and Port Hope, where remediation is slow and continuing decades after contamination in residential areas.

Watching the current process of siting a proposed DGR for radioactive waste by NWMO, we have witnessed manipulation of information about fission and the characteristics of waste products, financial incentives in the millions of dollars - bribery, and careful exclusion of discussion around the risks of every aspect of the Project, and dodging direct questions from people expressing opposition and/or suggesting alternative ways of handling the waste. It appears that the industry, which created the NWMO, has an agenda that will proceed regardless of the wishes of many thousands of Canadians. And the industry involvement with government has created a strong pro-nuclear bias that results in local MPs being unreceptive to constituent concerns and preferences.

We have seen that decommissioning nuclear power plants takes many decades. It's an enormous burden on taxpayers, and once again exposes the problem of what to do with radioactive debris that is toxic for thousands of years. Adding increasing numbers of new reactors is compounding the existing risks and expense to Canadians.

There appears to be some backroom discussion of reprocessing waste for some SMR designs. I don't know if that applies to the design being considered at these existing nuclear power plant sites. Some reprocessing sites in the US have the honour of being some of the most contaminated environment on the planet. Plus reprocessing for plutonium opens the door to an expanded market for that commodity, with increasing security risks and the buildup of well-armed security forces. That presents some ominous possible scenarios.

Further to expanding this industry - the peaceful use of atomic energy is required by the military industry to further develop and enhance nuclear armaments. If Canada is poised to be on the cutting edge of technology in a global market, as well as making our resources available to global markets for nuclear fuel, then this country is further enmeshed in an arms economy. Agreements to use what we offer for peaceful projects are poor protection. We've seen that in the past.

Finally, there is a social impact from advancing this technology. Communities involved in the site selection for a DGR have been divided, and morale is fragile. Indigenous communities are once again being pressured to accept the risk of destruction of their lands and disruptions in lifestyle. You cannot talk about adding new reactors without considering the end point of radioactive spent fuel, and debris from decommissioning.

And an accident in the ongoing operation of plants in Southern Ontario would expose millions of people, possible contamination of the Great Lakes, and damage to valuable and vital agricultural operations.

I am resolutely against further expansion of facilities already operating. It seems reasonable to maintain what already exists until its defined date for decommissioning. And rather than drawing on more public funds to keep installing what amounts to old technology, invest in truly renewable means of power generation, that do not carry anywhere near the risks and burdens to citizens that nuclear does.

Sincerely,
Mary Ludwig