



CMD 25-H2.64

Date: 2025-05-08

**Written Submission from
Linda Gasser**

**Mémoire de
Linda Gasser**

In the matter of the

À l'égard d'

Ontario Power Generation Inc.

Application to renew power reactor
operating licence for the Darlington
Nuclear Generating Station

Ontario Power Generation Inc.

Demande concernant le renouvellement
du permis d'exploitation d'un réacteur de
puissance pour la centrale nucléaire de
Darlington

**Commission Public Hearing
Part-2**

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

June 24-26, 2025

24-26 juin 2025

interventions@cnscccsn.gc.ca.

May 8, 2025.

Canadian Nuclear Safety Commission
280 Slater St
PO Box 1046 Stn B
Ottawa ON K1P 5S9

Re: Reference 2025-H-02 Darlington Application for a 30-year license renewal

I have been a Durham Region resident since 1988, living in Clarington from 1988 to 2010 and living in Whitby from 2011 to the present day.

I am an Ontario electricity ratepayer and as an Ontario tax payer an indirect shareholder in Ontario's OPG owned nuclear generating stations and want a say at regular licensing hearings that should occur at least every five years. This is required to earn public trust and to explain/adequately describe to those directly affected by OPG's and the CNSC's decisions as well as to have opportunities to review and understand the risks, costs and benefits, if any.

Below I describe some concerns about a 30-year operating license.

1. 30 years is too long a period to go without public licensing hearings – full stop. It's more than generational and so much can change economically, fiscally, technologically, politically between the time the license applications are submitted through to the time they would be approved through to expiry.
2. OPG/Ontario government already have a habit of not shutting down plants/reactors which are well beyond their design life e.g. Pickering and/or when they say they would. Those are decisions that can put public safety at risk similar to a too long license.
3. Periodic CNSC inspections and Regulatory Oversight Reports do not provide sufficient nor the same level of review and oversight that occur during a license application/review process nor are there the same public information disclosure requirements.
4. Ontario already has a huge provincial debt. Ontario's capacity to build new, and operate existing, plants is not static nor predictable over periods of economic uncertainty and are likely to be more challenging as economic and political conditions change. OPG and the Province MUST be REQUIRED to demonstrate at regular intervals during frequent licensing hearings that they have the capacity to operate in a way that meets all conditions AND considers public safety.

Nuclear generation stations are very expensive to build, refurbish, maintain and/or operate and Ontario has plans beyond new build at Darlington. Licensing hearings for Darlington would help ensure that requirements are met in a timely manner and evaluate whether or not there would

be merit to continue to operate Darlington even after the 4 “small” modular reactors began operating, should that occur within the expected time frame(s) or a new Candu design is developed.

5. OPG/Ontario just today announced construction of four “small” modular reactors on the same site as Darlington’s refurbished reactors. This is untested technology. New reactors using untested technology should NOT be built on the same site as Darlington’s existing reactors.
6. The Toronto Star reported on March 25, 2025 that the next generation of Candu design is also being considered. Surely there’s an expectation that the new design would be superior to the existing design, thus the economic viability of operating Darlington refurbished reactors has to be evaluated during licensing hearings which should occur every five years.
7. Ontario already subsidizes electricity ratepayers, in part because of the stranded nuclear debt. The true cost of electricity is likely to become far more expensive as nuclear energy generation is expanded and may again require huge subsidies. The economics of Darlington have to be evaluated during licensing hearings.
8. Financial health of OPG must be considered during public processes, together with the ability of Ontario as the shareholder during public licensing hearings that should occur at least every five years.
9. As with most nuclear projects initial estimates tend to be rosy and lower than final costs e.g. original Darlington build. Public sector projects in Ontario have a terrible track record with cost overruns and/or missed target dates and/or lawsuits project consortia etc. These have the ability to impact funds available to operate Darlington safely over a long period.
10. There will be competition for qualified AND experienced staff at OPG, the CNSC, at sub-contracting/consulting firms etc. That increases the risks of increasing costs and/or errors and/or oversights.
11. The Darlington site already is, and will be even more crowded. Four existing reactors PLUS construction of 4 “small” modular reactors which may not be that small after all PLUS the ongoing interim waste storage on the site.
12. Durham Region’s population has increased significantly since Darlington first built. In the 2021 Census, Durham Region had a population of 696,992. According to Durham Region’s official plan approved by Ontario’s Minister of Municipal Affairs in 2024, Durham’s population is expected to reach around 1.3 million by 2051.
13. Clarington, host to the Darlington site is projected to grow and has built and planned to build many thousands of homes many of which will be south of Highway 2 and quite close to the

Darlington site.

14. There's a rail line going through the site. That's a huge potential security threat and accident risk.
15. The Darlington site is very close to Highway 401 – Ontario's busiest highway corridor. There are future plans to extend Go Commuter rail transit to Bowmanville. Risks of operating a nuclear plant so close to essential transportation infrastructure should be evaluated via public licensing hearings at least every five years given existing concerns and risks, not all of which are currently predictable or even foreseeable.
16. Globally, security threats of multiple types are increasing as are acts of terrorism. There should not be major project construction (as for SMRs) on sites where existing nuclear facilities and public infrastructure already exists so as to avoid additional risks.
17. I recently learned that during an inspection it was found that Darlington's audible PA systems were not working and that this to be remedied by December 2026. Prior to the inspection did no one periodically test this PA system and notice it wasn't working? Is there no back up system? When something this elementary breaks down and only caught during inspections does not inspire confidence in the operator.
18. When governments/crown corporations/regulators know they will not be held publicly accountable by the public and qualified properly funded intervenors during license applications, they can get complacent or worse. That can lead to increased risks to public safety.
19. This is Ontario Emergency Preparedness Week. The Ontario website provides resources for various types of emergencies but NO separate guidance document is identifiable for nuclear emergencies, which is unconscionable given Ontario's current and planned nuclear plants and the billions of dollars Ontario intends to spend on nuclear, yet, they cannot find a way to make it clear that nuclear emergencies are one very important type of emergency with which the public should be familiar. <https://www.ontario.ca/page/emergency-preparedness-week>

Materials for all audiences:

The following materials are intended for all audiences:

- [brochure about how to prepare for an emergency](#)
- [brochure about how to prepare your pet for emergencies](#)
- [flyer about emergency preparedness for individuals living in high-rise buildings](#)
- [flyer about heat-related illnesses](#)
- [flyer about how to prepare for a power outage](#)
- [flyers about emergency preparedness for severe weather](#)
- [guide about emergency preparedness for people with disabilities](#)
- [guide about emergency preparedness for seniors](#)

One has to first be aware that there is such a thing as a Provincial Nuclear Emergency Response Plan to look for it at: <https://www.ontario.ca/document/provincial-nuclear-emergency-response-plan-pnerp-master-plan>

In Durham Region's "At the Ready" brochure, there is an insert alerting people living within 10 kms about KI pills and a diagram describing the Pickering and Darlington stations. KI Pill distribution should be expanded to everyone within 50 kms of a nuclear generating station. This has been a standing request by citizens and NGOs and has not been required to date but should be considered at EVERY opportunity including a license renewal hearing, which should occur at five-year intervals.

To conclude, if you expect the public have confidence in OPG and their ability to operate Darlington at least according to the requirements of the CNSC, and if you want the public to have confidence in the CNSC at a time when there are serious concerns about the public service at all levels of government, then licensing hearings every five years is the best way that OPC and the CNSC could attempt to earn public confidence. Absent public hearings, OPG and CNSC risk losing any social license there might be for operating nuclear reactors in Ontario and that may include current host community councils.

Having attended many CNSC hearings over the years, along with OPG "information" events as well as attending Durham Nuclear Health Committee meetings over the past decade, my observation/opinion is that the perceived economic benefits of nuclear stations operating in Durham is the main driver of what support there might be for nuclear outside of those directly/indirectly employed by the industry.

Those of us paying the freight and bearing the risk, in my case in Whitby sandwiched between Darlington and Pickering stations, deserve the highest level of ONGOING transparency and accountability from OPG and from the CNSC. One way this can be achieved is by imposing license terms of no longer than five years.

Thank you for your attention.

Linda Gasser