



CMD 25-H2.66

Date: 2025-05-08

**Written Submission from  
Mary Lou Harley**

**Mémoire de  
Mary Lou Harley**

In the matter of the

À l'égard d'

**Ontario Power Generation Inc.**

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

**Ontario Power Generation Inc.**

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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

Submission to the Canadian Nuclear Safety Commission on  
Darlington Nuclear Generating Station Licence Renewal  
CMD(s) 25-H2

Mary Lou Harley, PhD  
May 8, 2025

There is no justification for a 30-year operating licence as requested by OPG and recommended by CNSC staff for Darlington Nuclear Generating Station. Please retain the current practice of a 10-year licence period for operation of nuclear stations.

The age of the existing four reactors at Darlington. their recent or on-going refurbishments, their sections not being refurbished; the intended addition of experimental reactors to the Darlington site; and the realistic limitations to assuring the functionality and safety of each reactor over a long period all stand against long duration licencing

There are grave concerns about technological optimism and unsupportable assumption of the ability to project safe and reliable operation of four refurbished reactors and continued functionality of areas of the nuclear plants not refurbished. Such optimism in the safety cases, risk assessments, security concerns, and the adequacy of detail in emergency planning does not support long duration licencing.

Point Lepreau Nuclear Generating Station stands as an example of an attempt to get a longer operating licence (25-years) supported in 2022 by CNSC staff but the CNSC panel granted a 10-year licence. The series of problems at Pt. Lepreau nuclear plant during the following three years highlight the need for licence duration to be no longer than the current 10-year period.

Thank you for this opportunity to comment. Please reconsider the time period available for the next phase of public comments so that the proponent's response to this phase is received *before* those public hearings begin.