



**Written Submission from
Wendy O'Connor**

**Mémoire de
Wendy O'Connor**

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

Ref: 2025-H-02

Submission regarding Darlington Nuclear Generating Station Application for 30-year Operating Relicensing

Wendy O'Connor

To the CNSC,

I live in northern Ontario and am a volunteer with We the Nuclear Free North, an alliance of Indigenous and non-Indigenous people and groups who oppose nuclear waste transportation and burial in northern Ontario.

My attention has been brought to the subject of nuclear generated power by my concerns regarding the end-product of the nuclear fuel cycle: the highly radioactive waste containing over 220 radionuclides with varying radioactive characteristics, toxicities, and half-lives.

I oppose the granting of a 30-year operating licence to the Darlington Nuclear Generating Station, for many reasons, two of which I will outline here.

#1: Responsibility, effectiveness and transparency are reduced on a 30-year operating licence cycle

The concept of social safety has equal import to that of physical safety as it impacts the lives of Canadians. There is increasing suspicion – much of it well founded – that big business is coming to “call the shots” in government and social decisions. The worldwide nuclear industry is wealthy not only in dollars but in its powers to persuade governments and produce a barrage of advertising. Citizens with concerns or objections to nuclear power generation, or to management plans for nuclear fuel waste, often feel they have become unwilling but determined participants in a David and Goliath scenario.

Citizens with considered objections, concerns or preferences should feel optimally supported by the processes through which vital decisions are made by their country. Otherwise, public trust will be lost and the processes themselves will inevitably become meaningless and vulnerable to breakdown. With current events in the Western World, we all know democracy is under threat – but let it not be so in the way our government serves the Canadian people.

With these factors in play, it is untimely and unwise to reduce opportunities for robust and meaningful public input, such as those opportunities inherent in operating licence renewal processes for nuclear facilities. The granting of a 30-year operating licence for a nuclear generating station would have the effect of reducing such opportunities by two thirds, compared to the more usual 10-year (or less) operating licence cycle.

I note that the Periodic Safety Review (PSR), required approximately every 10 years by the current Darlington NGS operating licence, is expected to continue at 10-year intervals (ref. pg. 5, *Darlington Nuclear Generating Station Power Reactor Operating Licence Renewal Application*). However, neither the PSR process, nor Regulatory Oversight Reports (RORs), nor mid-term licence updating offer equivalent opportunities for public input/intervention, as compared to timely operating licence renewal hearings.

I contend also that responsible decision-making on the part of regulators requires and benefits from more frequent exposure to a wide range of perspectives, and to expertise outside of the Canadian Nuclear Safety Commission (CNSC). Much can change in 10 years in terms of institutional knowledge, public requirements and opinions, demographics and population growth, energy usage projections, and environmental considerations, among many other factors. A 30-year licensing cycle, aside from reducing public engagement, will fail to assimilate new conditions and data with efficiency, leading to compromises in social and physical safety.

#2: Site considerations and new technologies render an extended operating licence untimely

The Darlington Nuclear Generating Station is already a crowded site, surrounded by an ever-growing population. Combined with these challenges is the completion of the Refurbishment Project expected in Q3 2026, nine months into the new licensing period (ref: pg. v, *OPG Written Submission in support of Darlington Nuclear Generating Station Power Reactor Operating Licence Renewal*) and then continuing operation of four refurbished CANDU reactors – a technologically nuanced and novel undertaking, even if the operational basics are unchanged.

One more challenge particular to the upcoming licensing period is the planned addition of three “small modular reactors” (SMRs) on the site. With all due care, there remains an inevitable learning curve to operating new equipment, and the carrying out of what are likely to be evolving safety protocols.

With the crowded site, growing local population, almost-complete refurbishment and subsequent operation of refurbished (but undeniably old) reactors, and addition of substantial new technology/equipment, this is not the time to reduce oversight by both the CNSC and the public.

My request/recommendation:

I request that a maximum 10-year operating licence be granted to OPG for the Darlington Nuclear Generating Station.

Best regards,

A handwritten signature in black ink, appearing to read 'H. O'Connell', with a stylized flourish at the end.

APPENDIX - Referenced documents:

Darlington Nuclear Generating Station Power Reactor Operating Licence Renewal Application

OPG Written Submission in support of Darlington Nuclear Generating Station Power Reactor Operating Licence Renewal