



CMD 26-H7.43A

Date: 2026-08-19

Supplementary Information

Presentation from the Nuclear Transparency Project

In the matter of

Ontario Power Generation

Application to refurbish Pickering Nuclear
Generating Station and to renew licences
for the Pickering Nuclear Generating
Station and Waste Management Facility

Commission Public Hearing Part 2

October 2026

Renseignements supplémentaires

Présentation du Projet de transparence nucléaire

À l'égard de

Ontario Power Generation

Demande concernant la réfection de la
centrale nucléaire de Pickering et le
renouvellement de ses permis pour la
centrale et l'installation de gestion des
déchets

Audience publique de la Commission Partie 2

Octobre 2026



Submissions from the Nuclear Transparency Project

Re: Ontario Power Generation's application to renew its operating licence for the Pickering Nuclear Generating Station, Pickering Waste Management Facility, and to refurbish Pickering – B reactors

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NTP Coordinator

CNSC Public Hearing – October 2026



Presentation roadmap

1. About NTP and our interest in OPG's application
2. The need for consistency between consecutive regulatory reviews for the Pickering site and potential refurbishment
3. Persisting information and data gaps in available hearing materials
4. Concerns over the proposed new deep water intake
5. Concerns over groundwater contamination and releases to the lake
6. NTP submissions on the requested 10-year licence term



About NTP and our interest in OPG's application

- The Nuclear Transparency Project (or NTP) is a Canadian-registered not-for-profit organization dedicated to supporting open, informed, and equitable public discourse on nuclear technologies. NTP advocates for robust public access to data and other types of information. We also seek to provide accessible analysis of the data and information to which we have access: whether it is already being publicly reported or else obtained by our organization. We are committed to interdisciplinary, cross-sectoral, and equitable collaborations and dialogue between Canadian regulators, Indigenous Peoples and organizations, industry, civil society, members of host and potential host communities, as well as academics in a variety of fields.
- NTP's interest in the current matter concerns the need for regulatory consistency and transparency between reviews of the Pickering site and plans for its future as well as the quality of information on the record in this current proceeding



The need for consistency between regulatory reviews for the Pickering site

- 2009 Environmental Assessment under *CEAA, 1992*
- CNSC licence renewals in 2013, 2018, 2024
- OPG's 2017 and 2022 Predictive Effects Assessment (PEA)
- OPG's 2025 Predictive Environmental Risk Assessment (PERA)
 - No reference to past regulatory reviews
 - Concerns over significant information deficits, especially relating to proposed deep water intake and local aquatic ecology as well as groundwater contamination and releases



Persisting information and data gaps in available hearing materials

- Trends in Pickering site's ecology remain unclear, lack detail
- Lack of quantitative data on the record, generally
- Use of outdated data in Environmental Risk Assessments (ERAs)
- Need for more direct fish monitoring to understand fish presence and species-specific impingement conditions
- Inconsistent sediment data for tritium
- dismantling and demolition assessments will only be conducted in 2050
- Decommissioning plans still only “conceptual”
- No refurbishment follow-up monitoring plans available for public review



Concerns over proposed new “deep water intake”

- Insufficient descriptions of local aquatic ecology that may be affected
- Insufficient Darlington and Pickering impingement and entrainment data for comparison
- Insufficient detail concerning the design of the deep water intake
- CNSC staff and DFO reviews are incomplete, findings not available for public understanding or comment



Concerns over groundwater contamination, releases to the lake

- Significant localized groundwater contamination below Pickering reactors
- Concerns over changing (increasingly high) ecological benchmarks against which groundwater data is compared
- Concerns over releasing diluted contaminated groundwater to the lake
- Historical connection between groundwater contamination and maintenance issues
 - Relationship remains unclear between existing maintenance backlogs and planned refurbishment works



NTP submissions on the requested 10-year licence term

- Licence renewal hearings are the only legally guaranteed (legislated) mechanism for public engagement
 - Future of Regulatory Oversight Report proceedings are uncertain
 - Little standardization between, and poor quality of submissions during, licensees' mid-term licence updates
- Longer licence terms will frustrate the public's understanding of, and ability to comment during, future CNSC proceedings to consider the Pickering site



Thank you.