



CMD 25-H2.70

Date: 2025-05-08

**Written Submission from the  
National Council of Women of  
Canada and the Provincial Council  
of Women of Ontario**

**Mémoire du  
Conseil national des femmes du  
Canada et du Provincial Council of  
Women of Ontario**

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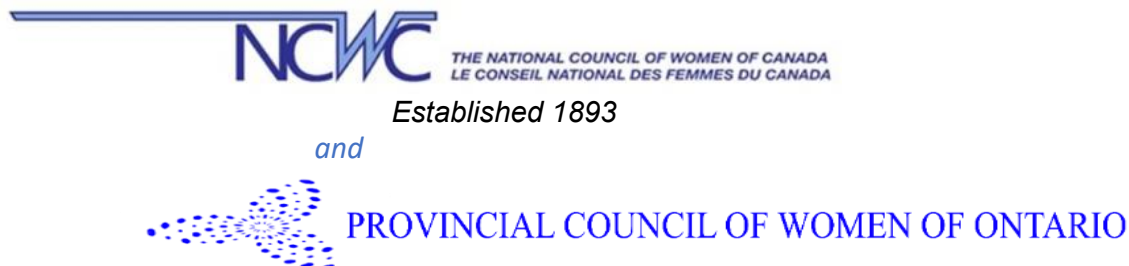
Demande concernant le renouvellement  
du permis d'exploitation d'un réacteur de  
puissance pour la centrale nucléaire de  
Darlington

**Commission Public Hearing  
Part-2**

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

June 24-26, 2025

24-26 juin 2025



Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission

[interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

Ref.2025-H-02

2025-05-08

**Request:** to intervene on behalf of the National Council of Women of Canada and the Provincial Council of Women of Ontario at the June 24<sup>th</sup>-26<sup>th</sup> 2025 CNSC hearing regarding our opposition to Ontario Power Generation's application to renew the power reactor operating licence for the Darlington Nuclear Generating Station for 30 years.

**Presenter:** Gracia Janes National Council of Women of Canada (NCWC) Environment Convenor -2022-2025 and Provincial Council of Women of Ontario (PCWO) Environmental advisor 2007-2025.

**Background:** The National Council of Women of Canada (NCWC) and the Provincial Council of Women of Ontario are member-funded, non- partisan, non -sectarian organizations, which have been working to advance the status of women and improve and enhance the lives of their families and of their communities across Canada . for 132 years.

Within this strong mandate , our essential goal as it relates to all components of the nuclear life cycle , is to alert Federal and Provincial governments, Commissions and their regulatory bodies , of the need to use the "*precautionary principle*", when dealing with threats to the public's well being , and to recommend protective change.

To support this work, National and Provincial Councils of Women have researched, and developed strong precautionary policies 1., and then presented position papers, and requests for action to protect the public to a wide variety of nuclear oversight bodies , and Commissions. 2.

## Public Concerns

NCWC and PCWO concerns regarding the danger of nuclear in all its life phases, echo and reinforce the value of information and evidence at previous hearings by many knowledgeable groups and individuals , at CNSC and other nuclear related hearings and meetings over the past 100+ years .

In Darlington's , case, these include some of the following issues:

- Very large current radioactive emissions from 4 existing 33 year old refurbished nuclear reactors ( Dr. Gordon Edwards)
- Construction of new rather large Modular BWRX-300 nuclear reactors (SMRs)
- Multiplicity of processes on site and release of radiation
- Rural nature of the area and potential accidents on roads to the site
- Even more radioactive emissions over farm crop lands
- Lack of procedures for monitoring fallout from releases. (CELA)
- Heavy construction blasting and a railroad nearby
- Accessibility for first Emergency responders on a multiple- use site
- Reduction of funds and efforts to improve electricity supply with renewables
- No plan to phase out nuclear and plan for renewables and energy storage
- Lack of opportunity for valuable public input , just CNSC staff , over a 30 year extended period
- No planned independent scientific experience and information as advised by the Seaborne Commission in 1998 .
- No funding for independent studies

## Conclusion

It is obvious to NCWC and PCWO, that given all the risks of even one nuclear installation at Darlington, much less 8 , the general public, independent experts, First Nations and particularly local residents , have good reason to be extremely concerned if the Commission approves OPGs 30 year licence. And, the CNSC staff , recommended foreclosure of public and independent expert input to operational and further licencing hearings, with only internal staff safety reviews, is completely unacceptable . Finally, if approved, the 30 year licence, 10 year reviews and staff - controlled oversight, are non -precautionary, and will set a precedent

It is a shame that CNSC staff have chosen a path that runs completely contrary to the Seaborn Commission's 1998 Report which strongly recommended that *NWMO should include independent scientists to help guide NWMO in future* and also stated that *"Canada's new waste management nuclear Policy needs to be underpinned by the precautionary principle and feature strong regulatory measures.* And also the public were respected at former public CNSC hearings. For example, at the 2018 Pickering Nuclear station life extension Chair Binder allowed public participants to question expert witnesses , and in a very precautionary way, warned staff to always consider *"the worst case scenario"*.

To conclude, the National and Provincial Councils of Women, urge the Commission to refuse the staff recommendation for a 30 year licence and set an initial 5 year limit, with a licensing hearing ensuring full public input and financial help .

## References

### 1. NCWC Policies

- 74.7 A Reduction in the Widespread Placement of Nuclear Electric Generating Plants
- 76.2 Nuclear Pollution
- 80.9 Nuclear Power
- 82.14 EM Nuclear Proliferation and Sale of Candu and Fuel
- 92.14 Halt the Promotion of Nuclear Technology as Safe Energy
- 97.5 Nuclear Weapons - Abolition 2000
- 97.11 PU Nuclear/Energy Future
- 03.2 PU Danger of Nuclear Weapons Readiness
- 08.3 PU Nuclear Power Phase-Out
- 10.2 PU Nuclear Power: Inclusion of Radioactive Emissions and Waste in the National Pollutant Release Inventory
- 11.1 PU Need for Realistic Insurance for Nuclear Incidents
- 18.04 PU Long-Term Stewardship of Nuclear Waste
- 23.06 Ban on Reprocessing of Nuclear Fuel Waste
- 24.08 The Transportation of Nuclear Waste

### 2. PCWO/NCWC Sample Presentations, Interventions and Position Papers

- 1. NCWC/PCWO Participants Seaborne Commission Hearings - 1998
- 2. PCWO Consultant, Ontario Energy Board Hearing re Ontario Power Authority(OPA) Integrated Power Supply Plan (IPSP) -2007/08
- 3. PCWO Intervenor CNSC hearing Bruce Power Transfer of nuclear steam generators from Kincardine to Stuttgart Germany for recycling -2010
- 4. PCWO Intervenor Joint Panel Review hearing Intermediate and Low Nuclear Waste Dump at Bruce site 2013-2014
- 5. PCWO Intervenor CNSC hearing Pickering Nuclear Plant Life Extension-2018
- 6. NCWC Intervenor -CNSC hearing Saskatoon U Slow Poke reactor dismantlement on site- 2019  
PCWO/NCWC Intervenor Chalk River CNL Nuclear Waste Dump 2022-2023