



**CMD 25-H2.74A**

Date: 2025-06-10

## **Supplementary Information**

### **Presentation from the Nuclear Transparency Project**

In the matter of the

#### **Ontario Power Generation Inc.**

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

#### **Commission Public Hearing Part-2**

June 24-26, 2025

## **Renseignements supplémentaires**

### **Présentation du Projet de transparence nucléaire**

À l'égard d'

#### **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

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

24-26 juin 2025



# Submissions from the Nuclear Transparency Project

Re: Ontario Power Generation's application to renew its  
operating licence for the Darlington Nuclear Generating  
Station

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CNSC Public Hearing – June 25, 2025



# presentation roadmap

1. About NTP and our interest in OPG's application
2. The *Nuclear Safety and Control Act* and 30-year licenses
3. Commission hearings in context: historical and ecological
4. The cost of longer licence terms



# about NTP and our interest in OPG's application

The Nuclear Transparency Project (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 and helps to produce accessible analysis of publicly available information, all with a view to supporting greater transparency in the Canadian nuclear sector. NTP is comprised of a multi-disciplinary group of experts who work to examine the economic, ecological, and social facets and impacts of Canadian nuclear energy production. We are committed to interdisciplinary, cross-sectoral, and equitable collaborations and dialogue between regulators, industry, Indigenous nations and communities, civil society, members of host and potential host communities, and academics from a variety of disciplines.

- A 30-year licence would constitute a significant impediment to open, informed, and equitable public discourse on nuclear technologies



## the *Nuclear Safety and Control Act* and 30-year licenses

- NSCA clearly envisions licence-related hearings as primary mechanism for supported public engagement
- Commissioners have discretion under the Act, but always paired with a duty to the public
- Less frequent relicensing hearings would effectively (and improperly) delegate Commissioners' duties to CNSC staff



## Commission hearings in context: historical and emerging concerns

- Historical legacy of secrecy in the sector demands strong commitment to transparency
- Growth in Canadian nuclear sector should not coincide with weakening meaningful opportunities for public engagement
- If Canada seeks to be a global leader in nuclear energy, it should seek a similar status for its nuclear regulation (incl. supported public engagement)
- Longer licence term will frustrate the public's understanding and ability to comment on specific licence (and LCH) terms that address emerging issues of regulatory interest such as public access to real-time, machine-readable, and disaggregated data



## Commission hearings in context: ecological and emerging concerns

- Ecological perspective required of regulators  
e.g. 30 years is even longer for many non-human species who have shorter generational cycles
- Local ecosystem in considerable flux: growing urban population and climate change
- Longer licence term will frustrate the public's understanding and ability to comment on specific licence (and LCH) terms that determine allowable impacts of the DNGS on a changing environment



## the cost of longer licence terms

- Commissioners' familiarity with facilities and publics' concerns
- Intervenors' familiarity with facilities and Commissioners' concerns
- Civil society's institutional knowledge
- Educative aspect of Indigenous intervenors' concerns
- Adverse effects of all these losses on public knowledge, discourse, and engagement on nuclear issues



Thank you.