



CMD 25-H101.6

Date: 2025-05-06

**Written Submission from the  
Coalition for Responsible Energy  
Development in New Brunswick  
(CRED-NB)**

**Mémoire de la  
Coalition for Responsible Energy  
Development in New Brunswick  
(CRED-NB)**

In the matter of

À l'égard d'

**Ontario Power Generation Inc.**

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Application to amend the Pickering Waste Management Facility to authorize construction and operation of the Pickering component storage structure

**Ontario Power Generation Inc.**

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Demande de modification du permis de l'installation de gestion des déchets de Pickering pour autoriser la construction et l'exploitation de la structure de stockage des composants de Pickering

**Public Hearing - Hearing in writing based  
on written submissions**

**Audience Publique - Audience par écrit  
fondée sur des mémoires**

July 2025

Juillet 2025

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**From:** Ann McAllister  
**Sent:** Tuesday, May 6, 2025 8:08 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** Comments on Ontario Power Generation's application to amend the waste facility operating license for the Pickering Waste Management Facility, Reference Ref. 2025-H-101.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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My understanding is that OPG hasn't applied for an amendment to its license for permission to refurbish the Pickering reactors, yet OPG is applying to amend its license to add storage for the radioactive wastes from refurbishment to its license. To apply to store wastes from a refurbishment that hasn't yet been approved erodes public trust in the licensing process.

Constructing a new waste storage facility is a major undertaking with forever implications for human health and environmental safety. A hearing entirely in writing for such a project is completely inadequate. The public must be able to have its say in a full public review with hearing.

The safety analysis for the proposed waste storage facility at Pickering has been based on the Darlington and Bruce Nuclear Stations' **facilities**. Instead, the safety analysis must be based on the actual design for the Pickering facility.

The highly radioactive wastes from the Pickering refurbishment will require isolation from humans and the biosphere for the very long term. The decision to approve and license the design of the storage facility must be made by the Commissioners, not the CNSC staff. To allow the CNSC staff to assign this role to themselves is an abrogation of responsibility.

OPG must submit a detailed characterization of the refurbishment wastes destined for the storage facility as well as its actual design before it applies to amend its license to include waste storage.

OPG must also provide its criteria for the wastes the proposed facility will accept.

The inevitable consequences of refurbishing the Pickering reactors and removing and storing the highly radioactive wastes will be to increase the radioactive doses to which workers and the public will be exposed.

The best plan for managing the radioactive wastes from the Pickering reactors would be to decommission and dismantle them and store **and monitor** the radioactive demolition rubble in attack-resistant above-ground vaults pulled back from the water's edge.

Ultimately, the only way to solve the problem of radioactive waste is to stop making any more of it. It's past time to stop refurbishing old reactors and building new ones. We have cleaner, safer, and less expensive alternatives for producing electricity.

Respectfully submitted,

Ann McAllister, Chair

Coalition for Responsible Energy Development in NB (CRED-NB)

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