



CMD 25-H101.7

Date: 2025-05-06

**Written Submission from
Juan Pedro Unger**

**Mémoire de
Juan Pedro Unger**

In the matter of

À l'égard d'

Ontario Power Generation Inc.

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

Ontario Power Generation Inc.

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

From: J. P. Unger
Sent: Tuesday, May 6, 2025 9:07 PM
To: Interventions / Interventions (CNSC/CCSN)
Cc: mayor_chow@toronto.ca; juanita.nathan@parl.gc.ca; Alexandre.Boulerice@parl.gc.ca; Michael.Barrett@parl.gc.ca; Yves-Francois.Blanchet@parl.gc.ca; elizabeth.may@parl.gc.ca; mstiles-qp@ndp.on.ca; jfraser.mpp.co@liberal.ola.org; mschreiner@ola.org; thecurrent@cbc.ca; ontariotoday@cbc.ca; McClearn, Matthew
Subject: Comments on proposal for Pickering Nuclear Waste Management Facility - OPG waste facility operating license amendment application - Ref. 2025-H-101

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

Re: Comments on Pickering Nuclear Waste Management Facility - Ontario Power Generation waste facility operating license amendment application - Ref. 2025-H-101

Dear Madams, Sirs,

The following brief comments express a few of the concerns over a proposal for a significant change to the operation of a nuclear waste facility in Pickering and very close to the city of Toronto, of grave concern in and of itself, and to the way it is being handled by the Canadian Nuclear Safety Commission (CNSC).

These are my main concerns, being a science writer and policy analyst, although **my understanding is that there are other concerns from nuclear experts** whose comments apparently **we will never actually hear due to the CNSC's chosen process:**

- Holding a **"public hearing in writing"** is a **blatant contradiction in terms, and a clear attempt at hiding** or keeping the public from actually hearing any serious concerns and criticisms that may arise from major potentially impactful nuclear proposals.

- **This proposal** for highly radioactive refurbishment wastes **should be directly tied to, if not part of, the** anticipated licensing application process for the **proposed refurbishment of nuclear reactors at the increasingly obsolete Pickering nuclear power plant.**

- **A license** for running an expanded nuclear waste operation **without having first details or even a semblance of waste acceptance criteria or independent scrutiny** is in effect handing a **huge blank cheque** for something with such long term and public health risks.

- **Where is the credible environmental assessment**, and where is the presumably required Ontario Environmental Bill of Rights public comments posting or other meaningful consultation?

- My understanding is that **the CNSC is considering having staff, instead of a panel of commissioners and public hearings, be the decision-makers for further matters related to such a facility.** Why such a change would be irresponsible and a betrayal of citizens' expectations of transparency and accountability, should be as obvious as it is unacceptable.

All of the above, for **something with such long-lasting public safety implications being slid quietly by through a "hearing in writing" during a period of public focus on electoral and political turmoil, reeks of corruption and dishonesty.**

This adds yet another big red flag to the CNSC's track record of over 20 years of seemingly unquestioned rubber-stamping of the multi-billionaire nuclear industry's every wish, and I believe **confirms the opinion of many former nuclear professionals and very**

knowledgeable critics that the CNSC is an industry-captured body.

We need top-notch careful, expert management of nuclear waste, one which benefits from and can withstand the test of expert public scrutiny and accountability, not blank cheques or cutting corners. We need better radioactive waste management, and truly independent, thorough and accountable regulation and oversight.

I urge the CNSC and those on copy to please press for a dismissal of this licensing application until unknowns, questions and concerns are publicly aired and fully addressed, and initiate a deep reform of the CNSC to make it a truly reliable, independent and accountable regulator of the nuclear industry.

Sincerely,

Juan Pedro (J. P.) Unger