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**Written Submission from the
Regional Municipality of Durham**

**Mémoire de la
Municipalité régionale de Durham**

In the matter of

À l'égard de

Ontario Power Generation

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

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

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

October 2026

Octobre 2026



The Regional Municipality of Durham

Submission regarding Ontario Power Generation's application to refurbish the Pickering Nuclear Generating Station and to renew licences for the Pickering Nuclear Generating Station and Waste Management Facility

August 2026

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Glossary of Acronyms

AAZ	Automatic Action Zone
CNSC	Canadian Nuclear Safety Commission
DPZ	Detailed Planning Zone
DNHC	Durham Nuclear Health Committee
DRPS	Durham Regional Police Service
ITER	International Thermo-nuclear Energy Reactor
KI	Potassium Iodide
MOU	Memorandum of Understanding
OPG	Ontario Power Generation
SMR	Small Modular Reactor

1. Message from the Regional Chair

Dear President Tremblay and Independent Members of the Canadian Nuclear Safety Commission,

On behalf of Durham Region, I am pleased to show support for Ontario Power Generation (OPG) in its application to refurbish units 5 through 8 of the Pickering Nuclear Generating Station (Pickering 'B'), and to renew operating licences for both the generating station and Pickering Waste Management Facility.

Nuclear has always been a vital part of Durham's story, and Pickering Nuclear Generating Station holds a special place in Canada's energy history. When its first units came online in the early 1970s, Pickering became one of the first large-scale commercial CANDU stations in the country and helped establish Canada as a global leader in nuclear technology.

For Durham Region, this legacy is not only historic; it is deeply local. Generations of skilled workers, businesses, researchers, engineers and public-sector partners have helped build and sustain the expertise that makes Durham one of Canada's most important nuclear jurisdictions.

The proposed refurbishment signals continued confidence in Pickering, supports high-quality local employment, strengthens the regional supply chain, and reinforces Durham's role in delivering clean, reliable electricity for Ontario and Canada.

It is also good news for the dedicated staff who work at the station and for the many families, suppliers and communities connected to this facility. Refurbishment provides a path to extend the benefits of this important asset while recognizing the skill, professionalism and commitment of the people who operate and support it every day.

We take great pride in being the Clean Energy Capital of Canada. This comes with considerable responsibility to protect the well-being of our residents and the environment, while also supporting the jobs, investment and innovation that are tied to the nuclear sector.

Sincerely,

John Henry

Regional Chair and Chief Executive Officer

The Regional Municipality of Durham

2. Acknowledgement

The Region of Durham exists on lands that the Michi Saagiig Anishinaabeg inhabited for thousands of years before European colonization. These lands are the traditional and treaty territories of the Nations covered under the Williams Treaties, including the Mississaugas of Scugog Island First Nation, Alderville First Nation, Hiawatha First Nation, Curve Lake First Nation, and the Chippewa Nations of Georgina Island, Beausoleil and Rama.

We honour, recognize, and respect Indigenous Peoples as rights holders and stewards of the lands and waters on which we have the privilege to live. In our efforts toward reconciliation, we continue to build and strengthen relationships with First Nations, as well as the large Métis communities and growing Inuit communities here in Durham. We commit to learning from Indigenous values and knowledge, building opportunities for collaboration, and recognizing that we are all connected.

3. Introduction

Durham Region has been at the forefront of nuclear innovation since the 1960s. The nuclear facilities, supply chain, research and development capacity, and academic expertise found within our borders make Durham Region Canada's premier nuclear jurisdiction.

Durham Region is an experienced and informed nuclear host community. We are home to Pickering Nuclear Generating Station, Darlington Nuclear Generating Station, the Port Granby Project, the Darlington New Nuclear Project, and a growing network of supporting energy infrastructure. Major new transmission investments are also being planned in and around Durham, including Ontario's first high-voltage underwater transmission line from the Darlington area to Toronto, which is intended to deliver up to 900 megawatts of clean, reliable electricity to support housing, transit, critical municipal operations and economic growth. Just east of Durham, OPG is also exploring the potential for new nuclear generation at the Wesleyville site in Port Hope, further reinforcing the strategic importance of this broader clean energy corridor. Together, these assets and opportunities give the Region a direct and practical interest in nuclear operations, refurbishment, decommissioning, emergency planning, environmental protection, transmission planning and long-term community well-being.

Regional Council has expressed its support for refurbishments, the International Thermo-nuclear Energy Reactor (ITER) Project,¹ Canada's SMR Action Plan, and re-licensing applications for the existing stations to the CNSC through Regional Council resolutions and Regional submissions. While the Region remains ineligible for CNSC's intervenor funding and has long argued that the provincial property tax policy for nuclear generating stations unfairly disadvantages property taxpayers in host municipalities, it is

¹ In the 1990s, the site of the Darlington New Nuclear Project was the site selected for Canada's bid on the ITER project. The ITER bid was won by France.

important for the Region to participate in this hearing process and submit this intervention to demonstrate our continued commitment to the sector.

Municipalities provide and deliver essential programs and services to meet the needs of their residents and local businesses. As a regional municipality, Durham has responsibilities to protect the well-being of our residents and the environment and to sustain our local economy.

Globally, our future depends on decarbonizing our communities and economy. In January 2020, Regional Council declared a climate change emergency. To act on this direction, the Region is implementing programs to reduce emissions, build climate resiliency, and is striving to be a carbon-neutral community. Durham Region has been recognized as a leader in municipal efforts to address climate change and we understand that nuclear energy will play a pivotal role in Canada's transition.

4. Durham Region and OPG's Partnership

Durham Region has a strong relationship with OPG. This includes regular meetings between staff to facilitate detailed conversations about projects and identify opportunities for partnership, presentations to staff, and facility tours.

Recently, staff from the Durham Region Health Department, Emergency Management Division, and Community Growth and Economic Development Department attended an OPG educational workshop on the Pickering Refurbishment Project, which supported a shared understanding of the project and its implications for Regional responsibilities.

Additionally, the Region partners with OPG on the following initiatives:

Community Engagement

Durham Region appreciates the activities undertaken by OPG to raise awareness of the nuclear sector within the community over the years including the Neighbours Newsletter, information centres, community advisory committees and media campaigns. Durham Region and OPG have partnered for a variety of community engagement activities including emergency preparedness week events and to develop a nuclear emergency preparedness public awareness strategy.

Emergency Management

For decades, the Region has played a leading role in nuclear emergency planning and continues to have significant responsibilities under the Provincial Nuclear Emergency Response Plan (PNERP). Through these responsibilities, the Region has developed a high level of expertise in nuclear emergency preparedness and response. Durham Region works closely with OPG, provincial partners, and local emergency services to ensure that appropriate plans, training, exercises, and coordination mechanisms are in place to respond to any emergency that may affect the community. OPG provides funding to the Region's Emergency Management Division through a Memorandum of

Understanding (MOU) to support specific nuclear emergency management planning, training, and preparedness activities. This partnership helps ensure the Region maintains the capabilities and resources necessary to fulfill its responsibilities and protect public safety.

Potassium Iodide (KI) Pill Distribution Program

Since 2014, Durham Region has been working in partnership with OPG on a potassium iodide (KI) distribution program that includes distributing new tablets, collecting tablets nearing expiration, developing and disseminating KI educational materials and raising awareness within the community about the availability of KI. KI tablets are distributed to all homes and businesses within the 10-kilometre Detailed Planning Zone (DPZ) surrounding Pickering and Darlington Nuclear Generating Stations and KI tablets are available free to anyone living up to 50 kilometres from either nuclear generating station by ordering them online at www.preparetobesafe.ca. OPG provides funding for this program through a separate MOU.

Durham Nuclear Health Committee

The Durham Nuclear Health Committee (DNHC) was established in 1995 at the direction of the province as a committee of Durham Regional Council, chaired by the Region's Commissioner and Medical Officer of Health. It has historically provided a forum for discussing potential radiation, environmental and human health impacts associated with nuclear operations in Durham. The Region continues to administer the DNHC, while OPG staff participate by providing technical information, educational presentations and updates on environmental monitoring.

Policing

The Durham Regional Police Service (DRPS) has an excellent working relationship with both the Emergency Preparedness and Security program and the Emergency Services Unit within OPG. To maintain a strong working relationship, DRPS participates in security and emergency services training and exercise activities in OPG's Emergency Management Program. This includes natural, technological and human-induced (criminal) emergencies or disasters. DRPS also participates in annual "Force on Force" security exercises and training opportunities in the roles of participant, observer and evaluator. The DRPS and OPG have an MOU for Off-Site Response that provides the framework for police response.

Air and Water Quality Monitoring

Durham Region has a partnership with OPG to host air quality monitoring stations on Regional property. Durham and OPG also work together to monitor Lake Ontario as a drinking water source by collecting and analyzing samples at all Lake Ontario based water supply plants for byproducts of the nuclear generating process. We work together to share monitoring and modelling data relating to water quality.

Regional Land Use Planning

Pursuant to Bill 23, as of January 1, 2025, the Region of Durham is defined by the province as an upper-tier municipality without planning responsibilities. This does not mean the elimination of the upper-tier planning function; however, Durham's eight area municipalities have assumed approval authority for all Planning Act decisions, except as prescribed by the Ontario Ministry of Municipal Affairs and Housing. Durham continues to have interests in land use matters that affect Regional infrastructure, emergency management, public health, environmental protection, economic development and long-term community well-being.

Envision Durham, the new Durham Regional Official Plan adopted by Regional Council in May 2023, has now become part of the Area Municipal Official Plans of Durham's eight local area municipalities. Each area municipality may repeal or amend it and is responsible for the portions of the Regional Official Plan that apply within its municipality. Envision Durham recognized the history and long-term opportunities related to nuclear power generation in Durham and identified a Regional interest in planning and regulatory processes for new and refurbished nuclear development, as well as the decommissioning and long-term future use of the Pickering Nuclear Generating Station lands. While the Region's formal planning approval role has changed, these interests remain relevant to the Region's responsibilities as a nuclear host community.

Durham also continues to have a direct interest in how land use decisions align with nuclear emergency preparedness. The Regional Official Plan included policies and mapping related to the Automatic Action Zone (AAZ) surrounding both the Darlington and Pickering Nuclear Generating Stations. For Pickering Nuclear Generating Station, the AAZ includes lands between Whites Road and Duffins Creek, from the Lake Ontario shoreline to Highway 401, including extensive existing residential areas. Future planning and development decisions in these areas should continue to consider emergency preparedness, risk mitigation and compatibility with the continued safe operation and future evolution of nuclear facilities.

Although the Region no longer has the same statutory planning approval role, early coordination with Durham Region remains important where nuclear projects, transmission infrastructure, decommissioning activities or future site redevelopment may affect Regional services, infrastructure, emergency management responsibilities, transportation networks, environmental interests, financial impacts to the Region and/or economic development opportunities. The Region encourages OPG, CNSC staff, provincial ministries and area municipalities to continue engaging Regional staff early and regularly on land use matters connected to nuclear facilities and related infrastructure.

5. Regional Participation in Nuclear Policy and Regulatory Affairs

Durham Region's participation in nuclear policy and regulatory affairs is grounded in its role as an experienced and informed nuclear host community. Decisions about nuclear operations, refurbishment, waste management, decommissioning, emergency preparedness and future energy infrastructure have direct implications for Durham's residents, businesses, municipal services and finances, lands, economy and long-term community well-being.

In February 2026, Regional Council approved an update to [Empowering the Community: Durham Region's Nuclear Sector Strategy](#) to reflect significant shifts and new initiatives in the nuclear sector. The updated strategy continues to recognize both the opportunities and responsibilities associated with being a nuclear host community and reinforces the Region's commitments to building public understanding, strengthening partnerships, supporting economic opportunities, preparing for future sector changes, and advocating for policies that protect community interests across the full life cycle of nuclear facilities.

Durham Region's approach to nuclear policy and regulatory affairs is also informed by its commitment to reconciliation and relationship-building with First Nations, Inuit, and Métis people and communities. The Region has established a bilateral agreement and continues to advance a Community Economic Development Initiative (CEDI) partnership with the Mississaugas of Scugog Island First Nation (MSIFN), strengthening government-to-government relationships and identifying opportunities for collaboration. These commitments inform how the Region understands its responsibilities as a nuclear host community, including the need to uphold and consider Indigenous rights, interests, knowledge and perspectives in long-term decisions affecting lands, waters, infrastructure and community well-being.

As outlined in the strategy, the Region is committed to playing an active role in nuclear regulatory processes and policy development across all levels of government to protect the interests of our community. The Region approaches these issues with future generations in mind. Decisions made today about refurbishment, waste management, decommissioning, site reuse and infrastructure planning will shape Durham's communities for decades. The Region will continue to advocate for policies that prioritize safety, environmental protection, fiscal fairness, socio-economic well-being and meaningful host-community participation throughout the full life cycle of nuclear facilities.

Participation in regulatory and policy processes is essential, but it requires significant staff time, technical review, interdepartmental coordination and Council reporting. As nuclear activity in Durham and the broader clean energy corridor grows, the Region anticipates continued and potentially increasing involvement in CNSC hearings and provincial and federal policy processes. This level of participation is necessary to

represent host-community interests, but it places a real and ongoing burden on municipal resources.

Durham Region recommends that the CNSC, OPG and senior levels of government work with nuclear host communities to establish fair, predictable and transparent funding or cost-recovery arrangements that support meaningful municipal participation in regulatory, policy and project-specific processes.

This approach is consistent with the Nuclear Communities Global Partnership [declaration](#), which calls on national and regional governments to actively listen to local communities, engage in early dialogue, provide resources for participation, and establish partnerships throughout planning and decision-making stages, as well as throughout development, operations, closure and decommissioning phases of nuclear projects. Durham Region supports this direction and encourages the CNSC, OPG and senior levels of government to apply these principles in a practical way with host communities.

6. Durham Region: the Clean Energy Capital of Canada

Support for Pickering Refurbishment

Durham Region is proud to be known as the Clean Energy Capital of Canada. As an experienced and informed nuclear host community, the Region supports the refurbishment and continued safe operation of Pickering Nuclear Generating Station and recognizes the station's important role in Ontario's clean electricity system, Canada's nuclear history and Durham's local economy.

OPG's current application represents an important next step in the long-term future of the Pickering site. The Region understands that the application includes refurbishment of Pickering 'B' Units 5 to 8 and operating licence renewals for both the station and Pickering Waste Management Facility. Durham's support is grounded in the expectation that safety, environmental protection, emergency preparedness, transparent communication and meaningful host-community engagement will remain central throughout refurbishment, continued operation, waste management and future decommissioning activities.

With the first refurbished unit expected to begin return to service by the end of 2029, the project would begin restoring Pickering's renewed clean electricity capacity to Ontario's grid at a time when demand is expected to grow due to electrification, housing growth, transit expansion and industrial development.

Environmental Protection, Lake Ontario and Indigenous Engagement

The Region understands that OPG's preferred option includes construction of a deep-water intake system to provide lower-temperature cooling water, improve station efficiency and reduce impacts to fish, fish habitats and the aquatic environment. The Region views the deep-water intake system as an important component of the

refurbishment project and expects OPG to provide continued transparency regarding its design, construction, operation and monitoring, including how potential impacts to fish, fish habitats and water quality will be avoided, mitigated and monitored. The Region encourages OPG to include current and water quality monitoring instrumentation at the intake to improve understanding of Lake Ontario water quality dynamics and support emergency response measures.

At the first phase of the CNSC hearing, OPG advised that it may be reconsidering whether the deep-water intake system will proceed as part of the refurbishment project. This is a matter of interest to the Region given the anticipated environmental, operational and community benefits associated with the intake system, as well as the significance of Lake Ontario to Indigenous rights and interests, drinking water protection, aquatic ecosystems and regional emergency preparedness.

The Region recognizes that engagement with Indigenous communities regarding the proposed intake infrastructure is ongoing and may include matters related to Indigenous rights and interests, protection of Lake Ontario, fish and fish habitats, cumulative effects, environmental monitoring, and the integration of Indigenous knowledge and stewardship perspectives.

Waste Management and Long-Term Site Planning

Durham Region acknowledges that OPG has safely managed used fuel and radioactive materials at the Pickering Waste Management Facility for more than three decades and understands that the application includes continued processing and interim onsite storage of used fuel and reactor components, including additional dry storage capacity and component storage infrastructure. The Region also recognizes OPG's ongoing efforts to explore beneficial reuse and repurposing of by-products where safe and appropriate.

At the same time, the Region has long-standing concerns regarding the continued multi-decade accumulation and storage of nuclear waste within host communities. While onsite interim storage is currently necessary, it was intended to be temporary and should not become a default long-term solution in the absence of timely national progress on permanent disposal pathways.

Durham Region continues to urge the Nuclear Waste Management Organization, federal and provincial governments, and sector partners to advance long-term waste management solutions, including timely progress on the deep geological repository for used nuclear fuel and continued planning for a separate disposal pathway for intermediate-level radioactive waste. These decisions are essential to support decommissioning, future site reuse and long-term host-community confidence.

The future of the Pickering site must also be considered in a comprehensive way. While Pickering 'B' refurbishment would extend the life and benefits of the operating units, the Region remains interested in the future of the Pickering A units and the long-term reuse

of lands as they become available. Durham continues to encourage OPG to advance planning for beneficial site reuse, including opportunities related to medical isotope production and processing, research, innovation and other low-carbon energy uses.

Regulatory Oversight and Public Safety

Durham Region is not positioned to undertake a technical assessment of OPG's application. An independent technical review can play an important role in supporting informed municipal and community participation. While Durham Region is not eligible for CNSC participant funding, the Canadian Association of Nuclear Host Communities was able to obtain participant funding to commission an independent technical review. Although this funding was provided to a national host-community organization rather than individual municipalities, it helped ensure that host community perspectives were informed by independent expertise. This example demonstrates the value of accessible funding mechanisms that support meaningful participation in regulatory processes and access to specialized technical advice where needed.

The Region continues to rely on the CNSC's independent regulatory review and oversight to determine whether OPG has demonstrated fitness for service, continued operational safety and adequate provisions to protect workers, the public and the environment. The Region supports continued robust regulatory oversight throughout refurbishment, extended operation, waste management and future decommissioning activities.

Economic Development and Host-Community Benefits

The scale of nuclear investment underway in Ontario presents a major economic opportunity for Durham Region. With refurbishment activity, new nuclear development, medical isotope production, waste innovation, transmission expansion and Small Modular Reactor deployment advancing across the sector, Durham believes that more of this economic activity should translate into permanent local investment, supplier growth and high-value careers within the region. Many Durham residents continue to commute outside the region for employment. As Canada's premier nuclear jurisdiction, Durham is well positioned to attract more nuclear technology development, manufacturing, research, training and supply chain activity. The Region's goal is to ensure that the communities that have hosted and supported the nuclear sector for decades also benefit directly from its next generation of growth. Durham Region is actively seeking to attract nuclear supply chain companies, technology firms, manufacturers, training providers and research partners to establish or expand operations in Durham. These investments would support local job creation, strengthen Ontario's clean energy economy, and help ensure that the communities hosting major nuclear infrastructure also share directly in the sector's long-term growth.

Durham Region is well positioned as a critical hub for workforce development as well as research and development in engineering, construction, logistics, radiochemical

processing, and waste management services. In collaboration with academic institutions like Ontario Tech University, Durham College, and Trent University, the Region is in the process of developing a Workforce Development Strategy and Action Plan to ensure labour force readiness with respect to professional and technical talent, as well as skilled trades to support refurbishment activities and future nuclear projects across the region.

Durham Region looks forward to continuing its partnership with OPG to support the safe refurbishment of Pickering Nuclear Generating Station, advance long-term planning for the Pickering site, and ensure that the economic, employment and innovation benefits of nuclear investment are realized in the host community.