

February 19, 2026

CD# W-CORR-00531-02086 P

Ms. C. Salmon

Commission Registrar
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario, K1P 5S9

Dear Ms. Salmon

**Western Waste Management Facility Licence Renewal Supplemental
Submission – Preliminary Assessment of Impacts**

The purpose of this letter is to submit to the CNSC OPG's Western Waste Management Facility (WWMF) Preliminary Assessment of Impacts as committed in the WWMF Licence Renewal Application (reference 1).

Attachment 1 provides the supplemental report of the WWMF Preliminary Assessment of Impacts based on the review of the WWMF Predictive Environmental Risk Assessment (PERA). In conclusion, based on the WWMF Preliminary Assessment of Impacts, there are no novel impacts on established and/or asserted Aboriginal and/or treaty rights.

Should you require any further information, please contact Mohammadreza Baghbanan, Senior Manager Regulatory Affairs at mohammadreza.baghbanan@opg.com.

Ms. Salmon

OPG Proprietary

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Sincerely,



Kapil Aggarwal
Vice President Nuclear Sustainability Strategies and Services
Ontario Power Generation Inc.

Attach

cc: K. Ross
S. Watt
T. Kalindjian
N. Chan
forms-formulaires@cnscccsn.gc.ca

Reference: 1. OPG Letter, K. Aggarwal to C.Salmon, "Renewal Application for Western Waste Management Facility Waste Facility Operating Licence – Attachment 2", December 18, 2025 W-CORR-00531-02073.

ATTACHMENT 1

OPG letter, K. Aggarwal to C. Salmon, "Western Waste Management Facility Licence Renewal Supplemental Submission – Preliminary Assessment of Impacts"

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OPG's Preliminary Assessment of Impacts – Supporting the WWMF Licence Renewal Application

Prepared By:	Andrea Goold
Checked By:	Ian Jacobsen

Preliminary Assessment of Impacts – Supporting WWMF Licence Renewal

OPG has undertaken further assessment to determine whether the requested expansion activities included in the Western Waste Management Facility (WWMF), Waste Facility Operating Licence (WFOL) renewal application, submitted to the Canadian Nuclear Safety Commission (CNSC) December 18, 2025, may give rise to novel impacts on established and/or asserted Aboriginal and/or treaty rights.

This expands on Section 1.6.2 Preliminary Assessment of Impacts of the renewal application that detailed a Predictive Environmental Risk Assessment (PERA) Addendum would be completed to consider potential impacts from expansion activities. In undertaking this further assessment, OPG considered potential impacts on Aboriginal and/or Treaty rights that may result from:

- Contaminants (radiological and conventional) and physical stressors from site preparation, construction, and operation of Used Fuel Dry Storage Buildings 9 and 10 (UFDSB 9/10).
- Interim storage for waste streams generated from isotope production, including isotopes produced by third-party vendors, such as those associated with the production of Lutetium-177 (Lu-177).

With respect to expansion activities included in the application, OPG's assessment that these activities are not anticipated to give rise to novel impacts on established and/or asserted Aboriginal and/or treaty rights is based on:

- The location of these expansion activities is within a previously developed area of the WWMF site, a site that is already heavily disturbed and within the Bruce Site exclusion area not accessible to the public.
- Potential impacts to the environment from site preparation and construction activities for UFDSB 9/10 will be mitigated through implementation of an environmental management plan, outlining procedures related to air (dust) and water management, noise control, and soil management.
- Potential impacts to surface water quality from construction activities for UFDSB 9/10 will be mitigated through stormwater management plans and spill management protocols for site preparation, construction and post development.
- Predicted radiological doses from future operations of UFDSB 9/10 are below terrestrial and aquatic dose benchmarks and many orders of magnitude below the regulatory public dose limit.

- No new interactions from UFDSB 9/10 are expected to pose a risk to human health or the environment based on the identified expansion activities.
- Interim storage of waste from isotope production is an activity already encompassed by the existing WFOL. There was no need for further assessment in the PERA Addendum, and no novel impacts are anticipated as this waste will continue to be stored in currently approved waste containers, within existing storage structures, and managed in accordance with the existing WWMF Waste Acceptance Criteria (WAC).

OPG has also shared the WWMF licence renewal application with Saugeen Ojibway Nation (SON), Métis Nation of Ontario Georgian Bay Traditional Territory Consultation Committee (MNO GBTTCC), and Historic Saugeen Métis (HSM) for their review and comments to inform OPG's understanding of how the activities in the renewal application may potentially impact established and/or asserted Aboriginal and/or treaty rights and how to address those potential impacts through avoidance, mitigation, and accommodation measures, as appropriate. Initial comments received to date have not identified any impacts to established and/or asserted Aboriginal and/or treaty rights from the proposed activities in the renewal application. OPG will continue sharing information with SON, MNO GBTTCC, and HSM on the WWMF licence renewal, including sharing a copy of the PERA, once finalized.

OPG remains committed to continuing engagement with SON on the WWMF licence renewal process. To ensure SON has sufficient capacity for review and engagement opportunities, OPG continues to extend offers to discuss providing capacity budgets.

**Summary of Regulatory Commitments, Regulatory Obligations and Regulatory
Management Actions Made/Concurrence Requested**

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Submission Title: **Western Waste Management Facility Licence Renewal Supplemental
Submission – Preliminary Assessment of Impacts**

Regulatory Commitments (REGC):

No.	Description	Date to be Completed
	None	

Regulatory Management Action (REGM):

No.	Description	Date to be Completed
	None	

Regulatory Obligation Action (REGO):

No.	Description	Date to be Completed
	None	

**Concurrence
Requested:** None

Impact Statement

For Ontario Power Generation Distribution Only

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Title: **Western Waste Management Facility Licence Renewal Supplemental Submission – Preliminary Assessment of Impacts**

Action Item No.: N/A

SCI: N/A

Summary: This letter provides the supplemental submission of WWMF's Preliminary Assessment of Impacts as committed in the WWMF Licence Renewal Application (reference 1).

Regulatory Commitments (REGC), Regulatory Obligation (REGO), and Regulatory Management Actions (REGM):

Commitment	Responsibility	Department	Date
None			

Impact: MGMT

Description	Responsibility	Department	Date
None			

Submission Prepared by: Sethara Kandasamy