



**Written submission from
Canadian Association of Nuclear
Host Communities**

**Mémoire des
Canadian Association of Nuclear
Host Communities**

In the Matter of the

À l'égard de

Darlington New Nuclear Project

**Projet de nouvelle centrale nucléaire de
Darlington**

Application to renew the nuclear power
reactor site preparation licence for the
Darlington New Nuclear Project

Demande de renouvellement du permis de
préparation de l'emplacement d'une centrale
nucléaire pour le projet de nouvelle centrale
nucléaire de Darlington

Commission Public Hearing

Audience publique de la Commission

June 10, 2021

10 juin 2021



CANADIAN ASSOCIATION OF
NUCLEAR HOST COMMUNITIES

www.canhc.ca

May 3, 2021

CNSC Commission

C/O Louise Levert, Senior Tribunal Officer, Commission Secretariat

280 Slater St., P.O. Box 1046, Station B

Ottawa, ON K1P 5S9

Dear Commission Members,

Thank you for giving the Canadian Association of Nuclear Host Communities (CANHC) the opportunity to provide a written intervention for **Ontario Power Generation's (OPG) Application for Renewal of OPG's Darlington New Nuclear Project (DNNP) Nuclear Power Reactor Site Preparation Licence (PRSL)**.

We are please to see that OPG has reviewed its previous submissions and studies, and updated them to current standards, and with updated data. Attached is our consultant's review of the information provided by OPG, and CNSC Staff. Based on the attached, CANHC would like to provide the following comments to the Commission.

As OPG begins site preparation work on site, and advances details based on a selected nuclear technology, CANHC expects the OPG will undertake environmental monitoring, and health and safety measures to ensure that site works are safe and any effects are mitigated. As well as monitoring effects from site works, CANHC expects that OPG will continue to monitor rising water levels on Lake Ontario and made adjustments to grading and flood and erosion protection as necessary.

In addition to monitoring human health and safety, and the environment, CANHC expects that there will be transparent communication and consultation with local infrastructure authorities, including the Regional Municipality of Durham, and the Municipality of Clarington. Any changes to infrastructure which ties in to other infrastructure systems can affect traffic patterns, or increase strain on utilities. To ensure that all systems are able to accommodate the necessary site requirements, it is important that all road and utility authorities are consulted.

OPG has an Emergency Preparedness Plan which includes plans and procedures with local and provincial level emergency services groups. As there are agreements in place for the Clarington Fire Services (CFS) to act as immediate response, it is essential that OPG keep CFS, as well as other local and provincial groups informed of any site and access changes on site throughout site preparation activities.



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Over the past few years the area around OPG's Darlington Nuclear site has undergone significant infrastructure changes. With these changes, there has been vegetation clearing in the vicinity. Additional clearing on the proposed DNNP site will increase the loss of bird, butterfly, and animal habitat. CANHC asks that OPG consult with CANHC's host communities, the Regional Municipality of Durham, and the Municipality of Clarington, further on having vegetation planted to maintain some bird, butterfly and animal habitat and also to act as a visual barrier.

Based on our consultant's conclusions, as well as OPG's assurance of the above, and continued consultation with local host communities on its plans, CANHC is happy to support OPG's licence renewal application.

We look forward to seeing more information as this project evolves.

Regards,

Sincerely,

Adrian Foster, Chair
Canadian Association of Nuclear Host Communities

HARDY STEVENSON AND ASSOCIATES

May 3, 2021

Mayor Adrian Foster
Chair, Canadian Association of Nuclear Host Communities
C/O The Municipality of Clarington
40 Temperance Street
Bowmanville, ON L1C 3A6

Re: CANHC CNSC Intervention for OPG Application for Renewal of OPG's Darlington New Nuclear Project (DNNP) Nuclear Power Reactor Site Preparation Licence (PRSL)

Please find included in this memo a review of Ontario Power Generation's (OPG) application to the Canadian Nuclear Safety Commission (CNSC) for renewal of their Darlington Nuclear site preparation licence. OPG has updated its studies from 2009 and found very few gaps and/or changes to the previous site conditions, and therefore finds that the previous conclusions are still applicable. In general, I believe that OPG has done its due diligence to analyze the potential impacts of their works on human health and the environment, and agree with their findings that these works will not have any effects that cannot be mitigated safely.

As this application is for a renewal of site preparation, and since the new nuclear technology has not yet been determined, a full safety and environment assessment has not, and cannot be undertaken. There will be an additional application for a licence once a technology has been decided. At that point, the Canadian Association of Nuclear Host Communities (CANHC) will have, in addition to human health and safety, and environmental considerations, an interest in any changes to the socio-economic effects of this expansion, including ongoing employment estimates, traffic and road impacts, other infrastructure impacts, and any changes to host community agreements.

Below are some comments on hearing documentation provided by both OPG, and CNSC Staff.

Site Evaluation

Included in OPG's CNSC application, and published on their website, OPG undertook studies to evaluate several geological, environmental, meteorological, and human hazards that could contribute to the site

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being unsafe for the DNNP. The assessments resulted in OPG concluding, and seconded by CNSC staff, that there are no increased adverse effects. Therefore, OPG has concluded that the Darlington Nuclear site remains a suitable location for a nuclear facility. OPG has also noted that it will continue to monitor any changes, including rising water levels, to ensure that their site, and the surrounding community, remains safe.

Safety and Control Areas

Without having picked a technology, the design and site preparation of the area is focused on clearing and grading the site, ensuring that there is access to the site, establishing general site infrastructure, and constructing flood and erosion protection measures. OPG notes that these general works will be done safely, while establishing mitigations measures to ensure the works are protective of human health and the environment.

Site preparation activities include road works, and other infrastructure and utility installation. CANHC should ensure that OPG undertakes proper communication and consultation with the road and infrastructure authority (e.g. the Municipality of Clarington, and the Regional Municipality of Durham) when designing and implementing any changes to onsite infrastructure that could affect offsite utilities and infrastructure.

OPG has also indicated that only minor modifications are needed for their emergency preparedness plans. These plans include communication and interaction with different fire and emergency services from local response teams, and levels of government, including immediate response via Clarington Fire Services. Therefore, CANHC should ensure that OPG keeps teams aware of any changes on site, including potential access changes.

Environmental Assessment

OPG has updated its studies from 2009-2012 and found few gaps and/or changes in regulations, as well as previous site conditions, and therefore has indicated that the previous conclusions are still applicable. These studies explored different environmental aspects, including aquatic, terrestrial, air, and human health effects.

Being located directly on Lake Ontario, there is always a lot of public scrutiny on any affects to the shoreline, water quality, and other aquatic effects. While there may be some effects to this environment due to erosion protection, and cooling and discharge infrastructure (when these are determined), we expect that OPG will ensure effects are mitigated to acceptable levels. OPG will also monitor these environments during and after site works to ensure that effects are within predicted levels.

Terrestrial effects include clearing of vegetation, which will affect bird nesting and migration, butterfly migration, and other animal habitat. CANHC may wish to consult with OPG further on having vegetation planted as a visual barrier, and also to maintain some bird, butterfly, and animal habitat, while also ensuring that this vegetation does not affect OPG's safety near the fence line.

Engagement and Consultation

OPG continues to engage with public and government stakeholders at various meetings, while providing public access to OPG studies and documents on their website, and updates via social media.

CANHC should ensure that it, and the host communities associated with the Darlington Nuclear Site, remain engaged and consulted as plans are developed for the DNNP.

Changes to the Licence and Licence Conditions Handbook

The CNSC has proposed changes to OPG's licence and licence conditions handbook based on OPG's renewal application. However, these changes are mostly administrative in nature, or updated to meet current CNSC standards and regulations. There have been no substantial changes to any required human health and safety, environmental, or oversight requirements.

Thank you for allowing me to review this information on your behalf. Based on the provided information, I do not see any substantial issues to human health and the environment related to the proposed site works, and believe that CANHC should support OPG's CNSC application. Please note that, while I have reviewed the information that OPG provided in their documents, I have not reviewed the data or methodologies, and rely upon OPG's expertise in the formation of their conclusions.

Kind regards,

A handwritten signature in black ink, appearing to read 'LW-Smith', written in a cursive style.

Lauren Wingham-Smith, P. Eng.