



Oral presentation

Exposé oral

**Written submission from the
Canadian Nuclear Association**

**Mémoire de
l'Association nucléaire canadienne**

In the Matter of the

À l'égard de

**Ontario Power Generation Inc. -
Darlington Waste Management Facility**

**Ontario Power Generation Inc. - Installation
de gestion des déchets de Darlington**

Application to Renew the Class IB Waste
Facility Operating Licence for Ontario Power
Generation in Darlington, Ontario

Demande de renouvellement du permis
d'installation de déchets de catégorie IB pour
Ontario Power Generation à Darlington
(Ontario)

Commission Public Hearing

Audience publique de la Commission

January 26, 2023

26 janvier 2023

December 5, 2022

Canadian Nuclear Safety Commission
c/o Louise Levert, Secretariat
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Subject: Canadian Nuclear Association Intervention in support of Ontario Power Generation's application to renew its Darlington Waste Management Facility operating licence

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 76,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life cycle of the nuclear industry including the safe management of nuclear waste and as such are supportive of OPG's application to renew its Darlington Waste Management Facility operating licence.

Like all forms of energy, nuclear energy creates by-products which in our industry are often referred to as nuclear waste. The Canadian nuclear industry is a cradle to grave industry and that the proper decommissioning, disposal of nuclear material and the ultimate return of nuclear facilities to state where they are available for alternative use is a responsibility our industry takes seriously and is a top priority.

"Nuclear waste" is a phrase with negative associations in the public mind; and the term is inaccurate when describing all the nuclear materials our industry handles, including materials that are clean, recyclable, and valuable – from copper and steel to heavy water – and important medical isotopes. OPG has changed the name of the Nuclear Waste Management Division (NWMD) to Nuclear Sustainability Services (NSS) to better reflect this reality. The new name is better aligned with OPG's long term goals and its Climate Change Plan. The NSS demonstrates that nuclear is clean energy, vital to net-zero climate action. With a focus on safety and protection of people and the environment, NSS demonstrates good stewardship of nuclear by-products, while developing lasting solutions for disposal, and ensuring public peace of mind.



OPG is committed to innovative and responsible solutions for managing radioactive materials safely, efficiently and cost effectively, and making investments for the continued safe operation of Nuclear Sustainable Services-Darlington (NSS-D). NSS safely accepts, transports, processes, and stores nuclear by-products, while embracing the three Rs – reduce, reuse, and recycle. A new five-year strategic plan for NSS emphasizes minimizing waste volumes at source and reducing volumes for interim storage and permanent disposal –to reduce costs and to reduce OPG’s environmental footprint.

NSS-D accommodates High Level Waste (HLW, irradiated or used fuel) produced by DNGS reactor operation and Intermediate Level Waste (ILW) from the Darlington Refurbishment Project at DNGS Units 1 to 4. OPG’s Licence renewal application for contains the information that demonstrates that OPG is qualified to carry on the licensed activities for the NSS-D. The application demonstrated that OPG has met CNSC requirements in all fourteen Safety and Control Areas and will continue to make the protection of workers, the public, the environment and the maintenance of national security and measures required to implement international obligations to which Canada has agreed, a top priority.

OPG has built a healthy nuclear safety culture that includes the NSS-D. OPG routinely monitors the health of its Nuclear Safety Culture through Nuclear Safety Culture Monitoring Panels which are based on nuclear industry best practices. A nuclear safety culture assessment was conducted in 2018. This assessment was based on a review of SCRs and other documents, an extensive survey sent to all NWMD personnel, along with interviews and field observations. The assessment found that NWMD including NSS-D has a strong and healthy nuclear safety culture.

The high level of safety at the NSS-D can be demonstrated through safety analysis, radiation safety and conventional safety. There has been no lost time accident or medically treated injury in the 14-years that NSS-D has operated. OPG maintains an ISO 14001 standard at all its sites including NSS-D as well as conducting an Environmental Risk Assessment every five years. OPG has established comprehensive environmental monitoring programs for the Darlington site (including NSS-D) and the results of monitoring and public dose assessments continue to demonstrate that dose to the public from the operation of the Darlington site is a very small fraction of the public dose limit. Non-radiological emissions remain negligible.

Like all members of Canada’s nuclear industry, OPG is committed to Indigenous engagement and reconciliation. OPG has a comprehensive Indigenous Relations Policy which includes the NSS-D. In addition to ongoing engagement regarding waste operations, OPG had specific engaged with local Indigenous communities with respect to the NSS-D licence application including meetings and site tours.



OPG also maintains a comprehensive Public Information and Disclosure program including posting reports on nuclear waste operations on a quarterly basis. In the current licence period for the NSS-D (November 2012 to July 2021) OPG distributed 18 Darlington newsletters to a combined 250, 000 households, had over 52,000 users visit OPG's Waste of DGR websites, attended 24 Durham Nuclear Health Committee meetings, 47 Community Advisory Council meetings and conducted 61 tours of the NSS-D.

It is the CNA's view that OPG has clearly demonstrated that it is qualified to carry on the licensed activities for the NSS-D and will continue to prioritize the protection of workers, the public and the environment. The CNA is pleased to recommend that the Commission renew OPG's operating licence for the Darlington Waste Management Facility for the requested 10-year period.

Sincerely,



Steve Coupland
Director, Regulatory and Environmental Affairs
Canadian Nuclear Association

