



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

**Mémoire de la  
Municipalité régionale de Durham**

In the Matter of the

À l'égard de

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

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

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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**



Sent by Email

December 5, 2022

**The Regional  
Municipality of  
Durham**

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Chair

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**John Henry**  
Regional Chair and  
CEO

Denis Saumure  
Secretariat  
Canadian Nuclear Safety Commission (CNSC)  
260 Slater Street., P. O. Box 1046  
Ottawa, ON K1P 5S9  
[cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)

**Re: Request to Intervene in Writing**

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Dear Mr. Saumure,

We appreciate the opportunity to provide this written intervention to the Canadian Nuclear Safety Commission (CNSC) in support of the Ontario Power Generation (OPG) – Darlington Waste Management Facility (DWMF) relicensing. As stated in the CNSC CMD 23-H9 (October 27, 2022) the current DWMF Class 1B facility licence was issued in 2013 for a ten year term.

The facility, which provides close to twenty per cent of Ontario's electricity, is located in the Municipality of Clarington within the boundaries of the Regional Municipality of Durham and is within the traditional and treaty territory of the Michi Saagiig and Chippewa Nations covered by the Williams Treaties.

The licence enables OPG to carry out the safe and responsible management of used fuel as well as the storage of intermediate-level waste associated with the Darlington Refurbishment Project. Activities take place at the Darlington site in licensed processing or storage buildings, of which there are currently one processing building, two Used Fuel Dry Storage buildings, and one Retube Waste Storage Building. OPG has met all applicable Environmental Assessment Follow-up Program requirements (as of 2016) for the facility licence.

We understand that the current licence provides for the planned construction of two additional dry fuel storage structures to support continued operations of the station. As construction has not yet been initiated, OPG has requested that this authorization be carried over to the next licence term, and that the storage capacity and design be amended to store 1,200 Dry Storage Containers or DSCs, (an increase of 200 DSCs), enabling adequate capacity to 2043.

If you require this information in an accessible format, please contact [accessibility@durham.ca](mailto:accessibility@durham.ca) at 1-800-372-1102 ext. 2009.

OPG stated that it will incorporate changes to the design of future storage buildings. We support the CNSC staff recommendation that the existing licence condition 15.2 be retained and that the licence condition 15.1 be modified to include the submission of a preliminary safety analysis report and require formal acceptance from the Commission or a person authorized by the commission.

OPG has a robust public and community engagement program, and shares information with the local community in a variety of means. Operations of the NSS-Darlington division are highlighted through OPG's discussions at a wide variety of community forums, including in the OPG Neighbours Newsletter, through their online platform and at community-based events, such as the annual OPG Open House. In addition, OPG has a key participatory role on the Durham Nuclear Health Committee, which includes providing quarterly operational, health and safety updates and other items of note. Regular updates from OPG's Nuclear Sustainability Services division (formerly known as the Nuclear Waste Management division) are received, as well as CNSC's annual Regulatory Oversight Report review of OPG operations and performance.

As the nuclear industry is the largest employment sector in our community, the Regional Municipality of Durham in 2021 approved Durham's Nuclear Sector Strategy 2022-2032 in support of our collective clean energy future. The Strategy will help the Region advance four of its strategic priorities including Environmental Sustainability, Community Vitality, Economic Prosperity and Service Excellence.

By enabling the Region to navigate and capitalize of its unique position as the Clean Energy Capital of Canada, the strategy will play an important role in the Region meeting its goal of achieving Net Zero carbon emissions by 2050. With the OPG Darlington Refurbishment project enabling the continued operations of the Darlington station to 2050 and the resulting positive impact of the project related to carbon emissions, OPG is considered a valuable community partner that will assist the Region in meeting net zero carbon emissions. Continued operation of the Darlington station is expected to reduce greenhouse gas emissions by an estimated 297 megatonnes, the equivalent of removing 2 million cars per year from Ontario's roads.

OPG's nuclear operations continue to have a positive net impact on economic growth, attraction and investment in the Region of Durham. As a result of the current operations of Darlington and Pickering nuclear facilities, as well as the Darlington refurbishment project, which will generate an average of 14,200 jobs per year, and the Darlington New Nuclear Project, the Region has become a global centre of nuclear expertise, with a strong cluster of nuclear energy-supporting organizations and institutions.

In conclusion, the Region of Durham appreciates the opportunity to support OPG's licence application and also appreciates the opportunity participate in the relicensing process alongside the public, Indigenous rights holders and communities, and stakeholders. The proven past performance of Ontario Power Generation – Nuclear, along with CNSC staff conclusions that OPG has continued to meet all regulatory requirements, provides reassurance that the protection of the environment, the health and safety of persons and the security of relevant facilities will continue to be maintained throughout the licence period, with CNSC regulatory oversight in place. Furthermore, OPG's excellent performance in the current licence term, including throughout the COVID-19 pandemic, are to be commended.

Yours truly,

Original signed by

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John Henry  
Regional Chair and CEO

cc: Steve Gregoris, Chief Nuclear Officer, Ontario Power Generation  
Mayor Adrian Foster, Municipality of Clarington  
Mayor Kevin Ashe, City of Pickering