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Supplementary Information

Renseignements supplémentaires

Presentation from the Nuclear Transparency Project Présentation du Nuclear Transparency Project

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





Submissions from the Nuclear Transparency Project

Re: Ontario Power Generation Inc. Application for renewal of their Class IB Waste Facility Operating Licence for the Darlington Waste Management Facility

Pippa Feinstein, JD LLM

NTP Coordinator

CNSC Public Hearing – January 26, 2023



presentation roadmap

- About NTP
- Recommendation 1: OPG's use of sustainability language
- Recommendations 2-4, 8-16: environmental monitoring activities, results, and public communications
- Recommendation 5: concerns over requested licence length
- Recommendations 6-7: procedural matters



Recommendation 1: OPG's use of sustainability language

- Duty to avoid euphemisms, transparency required recognition of wastes
- Section 9(b) of the *Nuclear Safety and Control Act* notes the CNSC's objects (i.e. purposes) include

"to disseminate objective scientific, technical and regulatory information to the public concerning the activities of the Commission and the effects, on the environment and on the health and safety of persons, or the development, production, possession and use of nuclear energy and the production, possession, and use of nuclear substances]".



Recommendations 2-4: improving data quality and public access to data

- Recommendation 2: sharing disaggregated data in machine-readable formats
- Recommendation 3: more transparency required for how OPG determines groundwater monitoring schedules
- Recommendation 4: more detailed event reporting



Recommendations 8 - 12: improving data quality and public access to data (groundwater)

- Recommendations 8 10: regular inclusion of Standard Deviation,
 Regression Analyses, and Normalized Means in public reports
- \bullet Recommendations 11 12: increasing monitoring parameters for groundwater sampling



Recommendations 13 – 16: improving data quality and public access to data (surface water)

- Recommendation 13: considering cations in receiving lake water
- Recommendations 14 15: increasing monitoring parameters for surface water sampling
- Recommendation 16: sampling improvements for local ponds and lake sediment



Recommendations 5: requested licence length

- Hearings and Transparency
- Hearings and public participation
- Civil society opposition to longer licence terms
- Changes to the Darlington site over the next decade



Recommendations 6-7: procedural matters

- Recommendation 6: recognizing multiple related Darlington licences*
- Recommendation 7: intervention timeframes*

* additional note re: PFP effective scoping for public hearings



Thank you.