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**Written submission from
Brad Blaney**

**Mémoire de
Brad Blaney**

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

From: Brad Blaney
Sent: December 5, 2022 11:53 PM
To: Interventions / Interventions (CNSC/CCSN)
Cc: Kelly Clune
Subject: OPG/Darlington nuclear waste renewal application Intervention;

Dear sir/madame

I agree with the CNSC that OPG does not, and never did require the CNSC blessing to change the name of any OPG facility.

I believe the CNSC is correct only to advise OPG that the renewal application must be fully and accurately completed so it may be duly processed by CNSC.

The name on the sign above the site is, otherwise, inconsequential to the CNSC mandate which is to oversee the site operations and the regulate the operator (in this case OPG)

However, OPG has significantly overstepped its reach by turning a routine renewal into an opportunity to ask the CNSC for its “implied validation” of a new operating name.

OPG should never have referred their marketing departments “rationale for the site name change” as it has nothing to do with the CNSC considerations as relates to the site renewal application.

The fact that CNSC declares that information provided to them by OPG regarding the name change is an “administration matter” is not enough.

To remedy this the CNSC must force OPG to complete and resubmit the entire application process again; this time without the irrelevant, subjective, narrative about “why their new name” for the site is best for citizens of Ontario and or the nuclear waste storage business..

Failure to do so will give OPG a “win-‘win” outcome because OPG will be able to state that it provided the its “basis” for the name change rationale to the CNSC, (even though it was never required for the site renewal application) and by the CNSC not challenging the OPG narrative it could be seen from objective observers that the CNSC also shares the OPG rationale;

Unfortunately, the CNSC cannot legally provide such commentary since it has no mandate to give this consent to OPG, implied or otherwise.

OPG has put the CNSC credibility as regulator at great risk.

The application must be rescinded and refiled.

Govern yourselves accordingly

Brad Blaney