



**Written submission from
Sarah Gabrielle Baron**

**Mémoire de
Sarah Gabrielle Baron**

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

Sarah Gabrielle Baron B.A. B.Ed.

Att'n Rumina Velshi, President, Canadian Nuclear Safety Commission
Interventions@cnsccsn.gc.ca

December 3, 2022

Dear Canadian Nuclear Safety Commission and President Rumina Velshi:

Please accept this letter of intervention, regarding Ontario Power Generation's application to renew their operating license for the Darlington Waste Management Facility.

With this letter I am urging a complete moratorium on expansion of nuclear power in Ontario, with specific reasoning detailed, below.

Overall, the following examples show that the Ontario Power Generating conglomerate, and CNSC, act with industry-led profit as their prime objective, and actively suppress community concerns regarding health and safety.

1. Renaming

Ontario Power Generation wants to change the name of the Darlington Waste Management Facility to "Nuclear Sustainability Services Darlington"

Greenwashing at the level is indicative of even further misinformation to come.

Nuclear waste can and must be clearly labeled at all levels.

This sort of greenwashing can be considered criminal and has been going on since at least 2015, when Crown control of Canada's nuclear plans, materials and blueprints was abrogated and given to SNC-Lavalin and USA nuclear weapons producer accomplices under the misnomer "Canadian National Energy Association."

How can the public know where to find information about nuclear waste in their community if the obfuscation starts at the original stage?

2. Faulty logic and blatant abuse of rhetorical tools for the purpose of misleading the public and suppressing access to information on safety by OPG

The following OPG quote is critiqued using logic and critical thinking based in human and natural safety, in ***italics and bold***.

"...“Nuclear waste” is a phrase with negative associations in the public perception;.."

As it should be! It is shocking that at the outset of this document OPG so openly declared war on truth and its intention to obfuscate and shroud this truth!

"...and the term is inaccurate when describing all the nuclear materials OPG handles, including materials that are clean, recyclable, and valuable – from copper and steel

When giving off radiation, these materials must not be considered recyclable or safe....see Port Hope for what happens when legacy waste issues are willfully ignored / suppressed by industry and Crown

"...to heavy water..."

For the OPG to include heavy water as "clean" or "recyclable" is dangerous to a criminal level. Heavy water contains materials that can be used in the production of nuclear weapons. Heavy water contains materials that when, not if but when, released into the environment are carcinogenic and mutative for thousands of years. Heavy water must always be governed by the Crown for the Canadian and world's protection.

"...and to important medical isotopes. Nuclear Sustainability Services is a name that is both true..."

This new proposed name is not true, it is deliberately obfuscating and based in lying to the public.

"...and inspirational..."

Inspirational to what ends? That plutonium or deuterium or tritium extraction of existing waste, and therefore the generation of untold new forms of radioactive waste, is somehow advantageous to the long-term health of humanity or local ecosystems? Or is it inspirational to private corporations like OPG who stand to gain financially from government handouts of millions and billions of taxpayer donations?

"...aligned with OPG's Climate Change Plan..."

Which erroneously posits that Canada can afford to ignore retrofits and renewables as the fastest way to meet our Paris greenhouse gas reduction goals

"...In both name and deed, NSS demonstrates.."

This body and name change and future-planned sorting/recycling facility do not exist yet. To employ rhetoric that works in present tense is clearly manipulative.

"...that nuclear energy is clean energy..."

There is no safe amount of radionuclide creation, as there is no sure safe way to ensure these elements stay out of our environment for their million-year lifetime. Just because the CNSC, NRCan and Health Canada refuse to study the impacts of bioaccumulation of radionuclides does not mean these impacts don't exist. Hear no evil, see no evil is not a scientific way to protect Canadian interests.

"... and vital to net-zero climate action..."

This bald-faced lie flies in the face of all best known science and economics on the matter. Retrofits, renewables, and smart-grids that allow for small scale energy resiliency and self sufficiency are the path to climate-change-ready communities. These solutions take the power and money out of large-scale producer pockets.

Therein lies the true push for new nuclear development: these for-profit companies made no plans to financially care for our nuclear legacy waste, and can only stay financially viable through the false narrative of next-gen nuclear profitability and attendant government handouts.

"...With a focus on safety..."

As evidenced how? By hiding the existence of nuclear waste at the Darlington facility via first a name change, then goodness-knows what other levels of obfuscation and sleight of hand?

"...and protection of public and the environment..."

Given the above, the public should be alarmed, not placated, as to OPG and CNSC and Crown ability to protect us and our ecosystems.

"...NSS demonstrates good stewardship of nuclear by-products, while developing lasting solutions for disposal,

Again, the switch to present tense before approval should be strongly disallowed.

Only the Crown with transparent public oversight (as per Seaborne Commission recommendations) should control decisions over nuclear by-products, as these pose both ecological and world peace and nuclear armament potentialities.

For-profit corporations must NOT be granted further leniency on control of nuclear products or by-products.

"...and ensuring public peace of mind."

If the industry is approved for this greenwashing by the CNSC, the CNSC will yet again expose itself as corporate-captured.

(CMD 23-H9.1, page 3)

3. CNSC exposed as corporate-captured

"CNSC staff find that this change is administrative and has no impact on the activities authorized in the license or CNSC regulatory oversight of the waste management facility." CMD 23-H9, see pages 7 and 77

This change is far more than administrative. Obfuscation at the naming level has a trickle down effect at all stages of the information pipeline.

4. Inadequate storage of HLW at Darlington

- a) dry storage buildings are built to standard building code, but do not have sufficient fortifications to protect the wastes in the case of extreme weather or terrorist attacks,
- b) dry storage buildings are constructed VERY close to Lake Ontario. In this application, Ontario Power Generation is proposing to build two additional storage buildings IMMEDIATELY ADJACENT TO LAKE ONTARIO!

Overall, this OPG application highlights that a for-profit industry should not be in charge of decisions regarding Canada's nuclear materials, and the Canadian Nuclear Safety Commission is complacent and complicit to these for-profit interests, to the point of potentially criminal negligence in their duty to protect Canadian health and safety interests.

This OPG petition and inevitable CNSC rubber stamp is just a drop in the bucket of evidence that a moratorium is required on all new nuclear expansion in Canada.

Therefore, a moratorium on all new nuclear development is warranted.

CC

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