



Comments on OPG's EIS and PPE Review Reports

April 4, 2023



Canadian Nuclear Safety Commission
Commission canadienne de sûreté nucléaire

Canada



Presentation Objective

To provide an overview of comments made on two reports submitted to the CNSC as part of OPG's DNNP Licence to Construct application:

- Updated Plant Parameter Envelope Report
- Environmental Impact Statement Review Report

Provide information on:

- Comments from the Canadian Nuclear Safety Commission
- Comments submitted by PFP participants, Indigenous Nations and Communities, the public and stakeholders
- Comment themes

CNSC Comments



CNSC Staff Comments by
Theme



CNSC Review of the EIS Review Report



Participant Funding Available

- Reports posted on the *Let's Talk Nuclear Safety* consultation platform.
- Participant Funding made available to facilitate review

November 2022



CNSC Staff Review Period

- CNSC staff continue review of PPE and EIS reports, with comments received
- CNSC staff document its review in Commission Member Documents

May 2023



Public Hearing

- Public Hearing scheduled in the community, focused on applicability of the BWRX-300 reactor to the Environmental Assessment

January 2024

October 2022

Documents Submitted

- OPG submits both the Plant Parameter Envelope and Environmental Impact Statement Review reports to CNSC



March 2023

Consultation Deadline

- Deadline for PFP and Public comments
- CNSC staff will compile, and review comments received from Indigenous Nations and Communities, PFP recipients, and members of the public
- Comments sent to OPG with an expected response by May 2023



September 2023

CNSC Staff Review Published

- CNSC Staff Commission Member Documents published and available for Public Comment
- Stage 2 of Participant Funding will be available





CNSC Comments on EIS Review (1)

- CNSC staff provided initial comments to OPG on March 1, 2023
 - Detailed comments on several aspects of OPG’s EIS review across various themes:
 - Design and Analysis
 - Effluents and Releases
 - Environmental Effects and Risk Assessments
 - Groundwater
 - Radiological Dose and Wastes

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| Design and Analysis | 12 |
| Effluents and Releases | 6 |
| Environmental Effects and Risk Assessments | 6 |
| Groundwater | 6 |
| Radiological Dose | 4 |
| Wastes | 2 |
| Monitoring of Parameters | 2 |
| General Comments | 1 |



CNSC Comments on EIS Review (2)

- **Theme: Design & Analysis**

- Staff requested OPG clarify its analyses on a number of assessed design parameters applicable to BWRX-300
 - For example: Snow and ice loads, wind speeds, effects of climate change
- Staff identified some areas where the quality of provided data required more analysis or information
 - For example: soil analysis and meteorological data



CNSC Comments on EIS Review (3)

- **Theme: Effluents and Releases**
 - Staff requested OPG clarify its estimates of radiological airborne effluents from BWRX-300 normal operation
 - Estimates for liquid effluents in accident conditions require clarity
 - Staff requested OPG clarify whether the release point height of BWRX-300 affects environmental modelling



CNSC Comments on EIS Review (4)

- **Theme: Environmental Effects and Risk Assessments**
 - Staff requested OPG provide information on components having residual effects on the environment with further studies to be completed
 - Effects of construction on bank swallow habitat; dust and particulates on the surface water and terrestrial environments
 - OPG requested to clarify how it determined significance of effects and selection of mitigating measures



CNSC Comments on EIS Review (5)

- **Theme: Groundwater**

- Staff requested OPG clarify whether updated groundwater data collected since the original EIS is included in its analyses
- OPG requested to clarify technical aspects of the groundwater model based on updated monitoring data and reports
- Staff requested OPG clarify its conclusions from modelling performed for soil dewatering for excavation



CNSC Comments on EIS Review (6)

- **Theme: Radiological Dose and Wastes**
 - Staff requested OPG clarify assumptions made in its assessment of dose consequences from airborne releases (normal operations)
 - Staff requested OPG provide information about exclusion zones previously provided in the 2009 EIS
 - Staff requested OPG provide information on radioisotope activity levels in radiological wastes and how handling equipment can mitigate environmental effects



CNSC Comments on EIS Review (7)

OPG has identified five additional residual adverse effects requiring additional studies; however, OPG had not provided the timeline, methodology, or conclusions of any of these studies

- OPG identified several areas requiring further study, based on the smaller BWRX-300 reactor footprint:
 - Bat and bank swallow habitats,
 - Aquatic and terrestrial environments (e.g., on-site ponds, thicket, plants, mammals, etc.)
- OPG was requested to provide details on these studies

**Comments from PFP participants,
Indigenous Nations and Communities,
the public and stakeholders**





Comments from Indigenous Nations and Communities

- CNSC staff meet regularly with Indigenous Nations and Communities
- Initial questions received so far from regular meetings similar themes
 - Initial comments received about various topics, across several themes:
 - Environmental Effects and Risk Assessments
 - Radiological Dose
 - Waste Management and Decommissioning
 - Emergency Preparedness and Response



Comments from PFP Submissions

General Comments



Design and Analysis



Environmental Effects and Risk Assessments



Waste Management and Decommissioning



Emergency Management



General Comments

- ✓ Land-Use Planning, Indigenous Nations Relationships, Timelines, Document Availability

Design and Analysis

- ✓ Severe Accident Management, Analysis of PPE Parameters, Climate Change Considerations

Environmental Effects & Risk Assessments

- ✓ Species at Risk, Mitigation Measures, Effects on Environment, Climate Change

Waste Management and Decommissioning

- ✓ Practices, Irradiated Fuel Management, Waste Inventory and Storage

Emergency Management

- ✓ Exclusion Zones, Response, Planning, and Availability of Information

THANK YOU



Questions?



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