

May 3, 2021

Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
280 Slater St. PO Box 1046  
Ottawa, Ontario K1P 5S9

**Subject: Canadian Nuclear Association Intervention in support of Ontario Power Generation's application to renew its Site Preparation Licence to support the Darlington New Nuclear Project.**

The Canadian Nuclear Association (CNA) has over 120 members representing over 76,000 Canadians employed directly or indirectly in generating clean electricity, researching and producing nuclear medicine, exploring and mining uranium and promoting Canada's worldwide leadership in science and technology innovation. As such our members have a strong interest in new nuclear developments.

Nuclear energy is a safe, reliable, and non-emitting source of electricity that plays a vital role in helping Ontario and Canada meet its climate change goals. Ontario's nuclear fleet was the major factor in allowing Ontario to move away from coal fired generation, leading to the single largest reduction in GHG emissions in North America. Greater electrification is key to continuing to reduce GHG emissions but only if that generation comes from non-emitting sources. The Darlington New Nuclear Project (DNNP) is an essential element of that Ontario's ability to continue to reduce emissions.

Notwithstanding the importance of non-emitting electricity, it must be generated in a manner that protects workers, the public and the environment. As the Commission knows, the Canadian nuclear industry operates on a safety first principle as demonstrated by Ontario Power Generation's (OPG) strong safety and operational performance over the past 50 years.

In 2012, after the acceptance of a thorough environmental assessment, led by a Joint Panel Review involving extensive public consultation, including 17 days of public hearings, the CNSC granted OPG a site preparation licence to allow activities to support future nuclear generation.



The current licence expires on August 17, 2022 and OPG is requesting a 10-year renewal of the licence with no request to expand the scope of the licence.

OPG has renewed planning for potential new nuclear power development at the Darlington site. OPG has not yet selected a technology but it is committed to ensuring that the technology chosen is within the bounds of the licensing basis for the accepted Environmental Assessment.

This commitment will be clearly shown through a detailed demonstration at the subsequent construction licensing process.

The Joint Panel review concluded that the DNNP would likely not cause significant adverse environmental effects provided OPG implements the mitigation measures proposed, commitments made during the hearing as well as the Joint Review Panel recommendations. Since 2012, OPG has been maintaining the Site Preparation Licence and progressing long lead regulatory commitments. OPG has submitted annual reports to the CNSC and a mid-term licence report in 2018 providing the status and progress of commitments made during the Joint Panel Review. OPG has demonstrated clear progress on these commitments and that they are “on track” for completion.

As part of its Site Preparation Licence renewal application, OPG undertook an extensive review to confirm the Darlington site continued to meet the conditions in the original licence. These steps included:

- A review of the management system that governs site preparation activities.
- A compliance review of the original application materials against REGDOC 1.1.1 requirements and guidance and addressing gaps.
- A review of current codes, standards and practices referenced in the licensing basis and those associated with REGDOC 1.1.1
- A review of applicable baseline data associated with the site.
- An evaluation of natural external hazards and external non-malevolent human induced hazards impact on the proposed facility and potential impact on people and the environment.
- A review of potential security threats.

Further to these reviews and in support of its application, OPG prepared and submitted detailed Licence Renewal Activity Reports and a Site Selection Threat and Risk Assessment.

The findings documented in the above reports and the licence renewal activity reports were reviewed and documented in an Aggregated Assessment report which is publicly available on OPG's website. The Aggregated Assessment Report clearly demonstrates that the existing licensing basis remains valid for the next licencing period with some mitigating actions added to the OPG Commitment Report.

The CNA believes that the best indicator of future performance is past performance and to that end, we would highlight that OPG has an extremely strong record of safe nuclear operations at both its existing nuclear generating and waste management facilities. Both Darlington and Pickering generating stations have been recently recognized by the World Association of Nuclear Operators for exemplary performance in safety and operations and any future activities at the Darlington site would be conducted under OPG's existing world class health and safety standards. The existing DNNP commitments to radiation protection remain in place and OPG's health and safety program will apply to all OPG personal and contractor support.

Like all CNA members, OPG values the relationships it has with Indigenous communities, the public and stakeholders. OPG emphasizes open and ongoing communications and operates active engagement programs with the public and stakeholders in all the communities where it has facilities. OPG's community relations and public information program has been recognized as a strength by national and international utility peers and OPG benchmarks its program against other industries to ensure continuous improvement.

Since the original licence was granted in 2012, OPG has continued to inform the public and stakeholders about the status of DNNP by augmenting its existing Darlington Generating Station program. Increased activities include information mail outs, posting updates on OPG's website, and using social media platforms. In addition, briefings have been held with key stakeholders, elected officials, and community committees and the public.

OPG acknowledges and respects the Aboriginal and Treaty rights of Indigenous communities and has engaged with the identified Indigenous communities in the vicinity of the DNNP. Indigenous engagement has been extensive beginning in 2006 and throughout the joint Panel Review and initial licensing process. Engagement has continued throughout the current licence period including detailed briefings and focused meetings on issues such as, environmental monitoring and protection of the environment and the need for ongoing, respectful, meaningful engagement and consultation.

As part of the preparation for this licence renewal OPG reached out to Indigenous communities, public and stakeholders to ensure they were aware of OPGs intention to renew the licence. Since the application was submitted. OPG has undertaken a comprehensive outreach and communications program to ensure that they are well informed about the status of commitments made under the EA, activities that have taken place on the site, studies undertaken in support of the licence renewal application and OPG's vision for the future of the site. OPG will continue communication and engagement activities throughout the stages of the project.

As previously noted, the DNNP site evaluation has been reviewed against the applicable regulatory requirements, codes, standards, and practices as well as baseline data and the DNNP site remains suitable for a new nuclear generating facility. Combined with OPG's proven track record as a safe, reliable, and responsible licensee, the CNA strongly supports OPGs application for a 10-year renewal for its Site Preparation Licence for the Darlington New Nuclear project.

Please feel free to contact me directly should you have questions or require additional information.

Sincerely,



**John Gorman**  
President and CEO  
Canadian Nuclear Association