



**Written submission from the
North American Young Generation in
Nuclear (NAYGN) - Durham Chapter**

**Mémoire de
North American Young Generation in
Nuclear (NAYGN) - Durham Chapter**

In the Matter of

À l'égard de

**Financial guarantee proposed by Ontario
Power Generation (OPG) for its Darlington
New Nuclear Project**

**Garantie financière proposée par Ontario
Power Generation (OPG) pour son projet de
nouvelle centrale nucléaire de Darlington**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

May 2022

Mai 2022

28-April-22

Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: cncs.interventions.ccsn@canada.ca

Re: Financial guarantee proposed by Ontario Power Generation (OPG) for the Darlington New Nuclear Project

Dear President and Commission Members,

Thank you for giving us the opportunity to intervene in this matter. NAYGN Durham is submitting this intervention in favor of CNSC accepting the proposed revision of OPG's financial guarantee for the DNNP site preparation as outlined in [\[CMD 22-H103.1\]](#).

NAYGN Durham Introduction:

North American Young Generation in Nuclear (NAYGN) Durham is a local chapter to the Durham Region which started its journey in 2008. The chapter organizes various social, professional development and community events such as nuclear conferences, industry tours, technical seminars, and lunch & learn informative sessions in the region. The chapter has approximately 1000 members, most of whom work for the nuclear industry in Darlington and Pickering area.

Darlington New Nuclear Project (DNNP)

Ontario Power Generation is preparing the Darlington Nuclear Site for the future construction and operation of a new nuclear generating station. As a part of the Power Reactor Site Preparation Licence by the Canadian Nuclear Safety Commission, OPG is required to meet the CNSC Financial Guarantee (FG) requirement associated with the site preparation activities in accordance with Licence Condition G.5 of the DNNP Power Reactor Site Preparation Licence (PRSL) PRSL 18.00/2031.

The proposed FG to cover decommissioning costs is zero dollars for 2022 and 2023 and \$451,000 (CAD) for 2024. CNSC, as outlined in [\[CMD22-H103\]](#), concluded that "*OPG's proposed FG is acceptable and adequate for the decommissioning of the DNNP for site preparation activities and is consistent with CNSC Regulatory Guide G-206*".

OPG's Darlington New Nuclear Project is leading the way in the advancement of Small Modular Reactor (SMR) technology in Canada – the future of nuclear power generation. SMRs, like existing nuclear reactors, are designed to provide reliable, low-carbon electricity, but with a much smaller land footprint. Low-carbon energy from SMRs is a key pillar in OPG's Climate Change Plan which will assist OPG's efforts to become a net-zero carbon company by 2040 and Ontario's aim to become a net-zero economy by 2050.

This is an important project for OPG, the nuclear industry, and the Durham region, with far-reaching impacts on helping reach net-zero carbon and boosting the economy. NAYGN Durham is fully in support

of CNSC accepting OPG's financial guarantee proposal given it is an important requirement as this is an essential part of the license.

Financial Guarantees

Financial guarantees (FG), meant to cover decommissioning costs to safely return the site to brownfield conditions as OPG proceeds towards the future stages of DNNP, is an important licence condition. The FG ensures that the licensee will be able to cover the costs associated with the decommissioning activities to terminate licensed site preparation activities per the PRSL 18.00/2031 in accordance with CSA N294-09 standard, and in line with CNSC regulatory guides G206, and G-219.

OPG has continued to demonstrate a commitment to protect health, safety, security and the environment through the DNNP project as evidenced by the DNNP Commitment Report and the site preparation preliminary decommissioning plan (PDP).

NAYGN Durham has reviewed following two categories to endorse OPG's financial guarantee proposal for DNNP.

OPG's Financial Foothold

Below key points highlight OPG's financial performance over last two years, and scope for future growth.

1. In 2020, OPG delivered \$1,361 million, and in 2021, delivered \$1,325 million in net income to the share holder, the province of Ontario.
2. Darlington's refurbishment project is currently on track and on budget. This is one of the most complex on-going projects in Canadian nuclear industry. Once completed, Darlington will be a source of stable income to the company and the province for foreseeable future.
3. OPG has invested on multiple other fronts, provincially, nationally, and internationally. OPG has various forward-looking partnerships in key businesses including hydrogen production, selling nuclear isotopes, collaborating with international entities on SMRs, and adding various energy generation stations into its energy portfolio achieving diversification of assets.

OPG's Commitment to Environment

OPG has a comprehensive environmental policy, adhering to ISO 14001 Environmental Management System standard, which show the company's commitment towards minimizing the impact on environment and achieving environmental performance excellence. In 2021, OPG won the following awards along with various others:

1. Sustainable Electricity Award
2. Centre of Excellence Net Zero by 2050 Awards

OPG's Niagara Operations was recently certified Gold by the Wildlife Habitat Council (WHC) once again. The three-year designation recognizes the outstanding environmental and biodiversity work continuing to take place at OPG's Niagara sites, which include the Sir Adam Beck and DeCew hydroelectric generating stations (GS), as well as Sir Adam Beck Pump GS.

OPG has conformed to its environmental commitments, as proven with safe and reliable operation of Pickering and Darlington Nuclear Generating stations, hydro, and gas powered thermal generating stations. Additionally, OPG safely decommissioned its coal fired generating facilities, restoring the project site to as found conditions in lieu of its commitment to minimizing its footprint.

Conclusion:

NAYGN Durham believes that OPG is in a strong financial position to provide necessary financial guarantees for its DNNP.

As such, NAYGN Durham chapter supports CNSC accepting the proposed revision of OPG's financial guarantee for the DNNP site preparation as outlined in [\[CMD 22-H103.1\]](#).

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