



**Written submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du
Conseil canadien des travailleurs du
nucléaire**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Applicability of the Darlington New Nuclear Project environmental assessment and plant parameter envelope to selected reactor technology

Applicabilité de l'évaluation environnementale et de l'enveloppe des paramètres de la centrale à la technologie de réacteur sélectionnée pour le projet de nouvelle centrale nucléaire de Darlington

Commission Public Hearing

Audience publique de la Commission

January 2024

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Canadian Nuclear Workers' Council

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November 20, 2023

Members of the Commission

c/o Tribunal Officer, Commission Registry
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Reference. 2024-H-02

CNWC submission regarding the applicability of the DNNP Environmental Assessment and Plant Parameter Envelope to the GE Hitachi BWRX-300 Reactor

Dear President Berube and Members of the Commission

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the Public Hearing scheduled for the week of January 22, 2024 regarding the application from Ontario Power Generation (OPG) for a licence to construct a reactor facility for its Darlington New Nuclear Project (DNNP). This submission is specific to the applicability of the DNNP environmental assessment (EA), environmental impact statement (EIS) and plant parameter envelope (PPE) to OPG's selected reactor technology, the General Electric Hitachi BWRX-300 Reactor.

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as a council of Unions with Members employed in Canada's nuclear industry. Unions affiliated with the CNWC represent Workers across Canada's nuclear industry, including: uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning. In addition, District Labour Councils in a number of nuclear host communities are CNWC Affiliates.

The Women and Men employed at the Darlington Nuclear Power Plant, the Darlington Waste Management Facility and the Darlington Refurbishment Project are represented by

the Power Workers' Union, the Society of United Professionals, Members of the Provincial Building and Construction Trades Council of Ontario (Ontario Building Trades) or the Society of Professional Engineers and Associates. Those Unions will also be representing the people employed at the DNNP through its evolution. Those Unions, as well as the Durham Region Labour Council, are all CNWC Affiliates.

To help ensure the perspectives of our Affiliates are heard the CNWC prepares policy papers and a regular newsletter, posts relevant information on our website <https://cnwc-cctn.ca> and social media, and holds a conference annually in the various communities hosting Canada's nuclear facilities. The 2023 CNWC conference was held at the Darlington Nuclear Information Centre where OPG provided a presentation on the DNNP.

Safeguarding the health and safety of Workers is paramount for all CNWC Affiliates. This has led to consistently high standards of occupational health and safety and environmental stewardship across Canada's nuclear industry. Canada's nuclear workers are very well trained, highly skilled and have the confidence to ask questions or raise concerns.

The CNWC is a regular participant in this regulatory process. We've been fully engaged in the DNNP since the beginning. We participated in OPG's community consultation sessions on the DNNP Environmental Impact Statement (EIS), in 2011 we made written and oral submissions to the Joint Review Panel (JRP) and in 2021 we participated in the CNSC public hearing on OPG's application to renew the DNNP Power Reactor Site Preparation Licence (PRSL).

In preparation for this submission we reviewed the submissions from OPG, CMD 24-H2.1 and CNSC Staff, CMD 24-H2.

OPG's submission

We support the findings in OPG's submission, CMD 24-H2.1, specifically:

- The eight BWRX-300 parameters that were not within the PPE were assessed and it was determined that they do not impact the conclusion of the EIS.
- The BWRX-300 is not fundamentally different from other reactor technologies assessed under the DNNP Environmental Assessment.
- Due to the smaller footprint and physical size of the BWRX-300 the effects on the environment are generally less than those examined in the EIS.
- The 2009 EIS remains valid for the deployment of the BWRX-300 at the DNNP site.
- The DNNP will not result in any significant adverse environmental effects, provided the required mitigation measures are implemented.

CNSC Staff's Assessment of Pickering

We are in full support CNSC Staff's assessment and conclusions, specifically:

- The majority of the parameters assessed in the EIS review are within the scope of the impacts assessed and accepted in the EA.
- OPG has adequately assessed the eight parameters outside the bounding scenario in the EA and that the mitigation measures identified in the EA are adequate to ensure there are no residual adverse environmental effects from the deployment of four BWRX-300 reactors.
- OPG has adequately assessed changes to baseline environmental conditions for environmental components assessed in the EA.
- There will be no significant residual adverse environmental effects from the deployment of four BWRX-300 reactors provided OPG implements the required mitigation measures identified in the EA.
- OPG's selection of the BWRX-300 reactor technology is bounded by the EA, and the EA remains applicable.

We concur with CNSC Staff's recommendation that the Commission determine that the BWRX-300 technology selected by OPG is within the bounds of the JRP EA.

Concluding Remarks

The deployment of four (4) BWRX-300 small modular reactors will not provide the 4,800 MW allowed by the DNNP EA or the magnitude of employment opportunities and local economic benefit estimated in the EA, however we agree the 2009 EIS remains valid for OPG's selected technology.

The CNWC recommends the Commission determine the BWRX-300 technology selected by OPG is within the bounds of the JRP EA.

The CNWC intends to participate fully in the second part of the CNSC public hearing on OPG's application for a licence to construct a reactor facility for its DNNP.

Thank-you for the opportunity to participate in this important public process and thank-you to CNSC Staff for a thorough submission.

Respectfully submitted,



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