



**Written submission from the
Canadian Nuclear Association**

**Mémoire de l'Association
nucléaire canadienne**

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

Janvier 2024

CNAREG-102176849-563

November 20, 2023

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St.
PO Box 1046 Stn B
Ottawa ON K1P 5S9

Subject: Public hearing on applicability of the Darlington New Nuclear Project environmental assessment and plant parameter envelope to selected reactor technology

Dear Recipient,

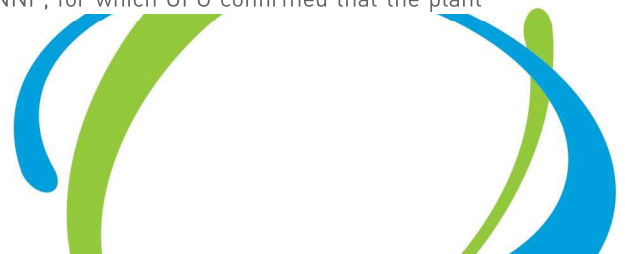
Ontario Power Generation (OPG) is one of CNA members' which has approximately 100 members, representing over 76,000 Canadians employed directly or indirectly in exploring and mining, uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. With respect to electricity generation, today, nuclear energy produces approximately 20% of Canada's non-emitting electricity, including 30% of New Brunswick's and approximately 63% of Ontario's for which 20% of it originates from the Darlington Nuclear Generating Station (DNGS), 14% of Ontario's overall electricity from a single site.

CNA is proud of the contribution of our members, including OPG to the Canadian industrial, societal, and technological landscape and respective communities. Beyond the invaluable past contributions of our members, today, both OPG and CNA share a view of long-term growth in the nuclear industry, which is foreseen to provide long term energy security and clean energy to Canada, technological advances beneficial to all Canadians and sharing of such advances with like-minded countries.

Committed to the aforementioned, OPG initiated the Darlington New Nuclear Project (DNNP) in December 2021, based on the General Electric Hitachi BWRX-300 reactor for deployment at the DNNP site of 4 new nuclear reactors generating approximately 4,800 megawatts of electricity for the Ontario grid.

The DNNP, with a power plant footprint smaller than the size of a football field, underwent an environmental assessment (EA) to identify, predict and evaluate potential environmental effects, and likely significance or lack thereof, a process common to a large array of projects. The Joint Review Panel (JRP) for the DNNP, an independent body mandated by the Minister of the Environment and the President of the CNSC, submitted OPG's EA to both the minister of the Environment and Minister of Natural Resources which determined that the DNNP project is compatible with the protection of the environment and impacts.

DNNP, just like any new nuclear projects, is subject to multiple steps to demonstrate compliance and due diligence with legal and regulatory frameworks and interested parties' expectations. The DNNP EA underwent the scrutiny of Aboriginal groups, federal, provincial and local governments, environmental groups and individuals, and as a complement and continuation OPG further followed up with an assessment of the BWRX-300 reactor envelope plant parameters. CNA is therefore pleased to continue its support of the DNNP, for which OPG confirmed that the plant



parameters were consistent with the EA (190 of 198 parameters) and the remaining 8 parameters with no impact on the conclusions.

While CNA is proud of OPG's advances and achievements and compatibility of the BWRX-300 envelope parameters with Canadian environmental commitments and interested parties, we would like to remind that our member's success is only one success among many future successes. Indeed, the BWRX-300 will continue undergoing environmental scrutiny during construction, commissioning, operation, decommissioning and release since the safety and compatibility of traditional activities within the vicinity of licensed facilities is confirmed on a regular basis through multiple community based environmental monitoring and regulatory oversight.

The CNA reiterates its support whether it is with respect to OPG's due diligence, or the outcomes of the environmental assessment against the plant parameter envelope and asks the Commission to consider positively the continued validity of the 198 parameters.

Please feel free to contact me at mirmirans@cna.ca, or (613) 710-0810, should you have questions or require additional information.

Sincerely,

Sorouche Mirmiran, P.Eng
Director, Regulatory Affairs CNA

