



**Written submission from the
Clarington Board of Trade**

**Mémoire du Clarington
Board of Trade**

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

November 14, 2023

CD# NK054-CORR-00531-10849

Mr. Denis Saumure
Commission Registrar

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Saumure:

Notice of Participation at CNSC Public Hearing 2024-H-02 and Written Submission in support of the DNNP Hearing on Applicability of the Darlington New Nuclear Project Environmental Assessment and Plant Parameter Envelop to the Selected Reactor Technology.

On behalf of the Board of Directors and the membership of the Clarington Board of Trade (CBOT), we submit this letter in support of Ontario Power Generation (OPG), and the submission for the DNNP hearing on Applicability of the Darlington New Nuclear Project Environmental Assessment and Plant Parameter Envelop to the Selected BWRX-300 Reactor Technology.

The Clarington Board of Trade is a Not-For-Profit business organization focused on the retention and sustainability of the business community within the Clarington borders. We represent over 350 business members and community organizations. As a key member of our business community OPG continues to partner with CBOT and our members on opportunities for inclusion and to educate our business community and developing workforce for New Nuclear at the Darlington Site.

CBOT is excited to see the New Nuclear Project move forward as the BWRX-300 has been chosen for development at the Darlington Site. This new technology will provide our local business's opportunities to explore and provide products and services to this large project.

CBOT and OPG partner on several initiatives each year to educate and find opportunities for business and youth engagement along with awareness of the New Nuclear Project. Current, informative and transparent information is shared through our Student Employee Summits, Energy Summits, regular networking, and member newsletters.

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The Clarington Board of Trade's activity with the New Nuclear file dates to 2009 supporting the original New Build regulatory process in 2011 with our submission of support to the Joint Review Panel regarding Darlington New Nuclear Project Environmental Assessment (EA).

Recently OPG has provided comprehensive updates about the Site Preparation License, Environmental Impact Statement and Plant Parameter Envelope reviews ensuring we are informed and up to date on the SMR (Small Modular Reactor) developments.

OPG undertook extensive studies, assessments and consultations with Indigenous communities and stakeholders to complete the site evaluation studies and develop OPG's Environmental Impact Statement (EIS), for the DNNP EA. The site evaluation studies concluded that the DNNP site is suitable for a new nuclear plant. The EA was completed and concluded that the project is not likely to cause any significant adverse effects, provided the mitigation measures proposed and the commitments made by OPG are implemented. The JRP, consisting of representatives from the CNSC and Canadian Environmental Assessment Agency, accepted the DNNP EA.

The Darlington New Nuclear Project (DNNP) was subject to an Environmental Assessment (EA) under the Canadian Environmental Assessment Act (CEAA). Once the BWRX-300 reactor was selected, OPG thoroughly assessed the technology to demonstrate that it fits within the existing accepted EA.

OPG completed a comparison of BWRX-300 design parameters with the DNNP Plant Parameter Envelope (PPE) values, and a comprehensive review of the Environmental Impact Statement (EIS) for the selected reactor technology.

It was concluded that the effects of the BWRX-300 Small Modular Reactor (SMR) deployment on the environment are within the existing assessment envelope and generally less than those examined in the EIS. The EIS review has determined that the conclusion of the 2009 EIS remains valid for the deployment of the BWRX-300 at the DNNP site.

CNSC reviewed the OPG assessment and responded through CMD(Commission Member Document) 24-H2. CNSC staff note that the majority of the parameters assessed in the EIS Review fall within the scope of the impacts assessed and accepted in the EA, or are not applicable due either to the design of the BWRX-300 reactor, and/or due to OPG's approach to the design.

Consequently, CNSC staff expect no significant residual adverse environmental effects from the deployment of up to four BWRX-300 reactors, provided the mitigation measures identified in the EA are implemented, as required by OPG's EA follow-up program.

We support the CNSC staff and OPG assessments that the BWRX300 technology is not a fundamentally different technology, and that it falls within the DNNP plant performance envelope used as the basis for environmental assessment.

According to the Conference Board of Canada, the benefits to Ontario for a single 300-megawatt electrical unit reactor will be significant. The SMR can generate \$ 2.6 billion in GDP, \$1.7 billion in wages and \$873 million in taxes for the Ontario Economy. On average, SMR manufacturing and construction adds 1604 Ontario jobs per year and 1939 jobs per year for Canada.

In conclusion, The Clarington Board of Trade supports the analysis with respect to the Darlington New Nuclear Project Environmental Assessment and Plant Parameter Envelope to the Selected Reactor Technology. In light of the comprehensive work to ensure community safety and economic benefits for Clarington, Ontario and Canada we are confident that the impacts of this project will yield great results.

Sincerely,



Sheila Hall, Executive Director
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Cc:
Mayor Adrian Foster
MPP Todd McCarthy
MPP David Piccini
MP Phillip Lawrence