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Written submission from the Nuclear Waste Management Organization

Mémoire de la Société de gestion des déchets nucléaires

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

Canada

NUCLEAR WASTE MANAGEMENT ORGANIZATION
SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

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NWMO-CORR-00531-302225

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Intervention in the matter of OPG's applicability of the Darlington New Nuclear Project Environmental Assessment and Plant Parameter Envelope to the Selected Reactor Technology

This written submission is in response to the April 3, 2023 Notice of Public Hearing and Participant Funding for the CNSC hearing on applicability of the Darlington New Nuclear Project (DNNP) environmental assessment (EA) and plant parameter envelope (PPE) to selected reactor technology. NWMO previously provided an intervention during the renewal hearing for the DNNP licence to prepare site (CMD 21-H4.45) and continues to reiterate the support provided in that intervention.

As noted in CMD 21-H4.45, the NWMO is obliged under the Nuclear Fuel Waste Act to offer its services, without discrimination and at a fee that is reasonable in relation to its costs of managing the nuclear fuel used fuel to all owners of nuclear fuel waste produced in Canada. Nuclear fuel waste includes the irradiated fuel removed from any commercial or research nuclear fission reactor in Canada, including SMR's.

The NWMO continues to offer its services to the small modular reactor proponents, including General Electric Hitachi and OPG for the BWRX-300, to establish the long-term management program required for the deployment of their specific technology. NWMO's Adaptive Phased Management (APM) approach is flexible and adaptable to the introduction of new nuclear power generation technologies, such as the BWRX-300.

This particular hearing, and, thus, this submission, is focused on the applicability of the DNNP EA and PPE to the selected reactor technology (BWRX-300). While an Environmental Assessment does not have a "shelf life" (as noted by Dr. Nana Kwamena (CNSC) during the June 2021 Commission hearing on the DNNP licence renewal), now that a technology has been selected, the Commission must confirm that the scope of the project remains within the scope of the EA. Both OPG in CMD 24-H2.1 and the CNSC in CMD 24-H2 have provided a detailed assessment on the applicability of the selected technology within the scope of the EA that was completed. NWMO has reviewed the submissions and agrees with the conclusions that the BRWX-300 is within the scope of the EA, considering the review done on the 198 parameters assessed.

As Canada navigates the dynamic landscape of sustainable development, it is evident that projects may evolve over time. Parameter envelopes serve as a robust framework, allowing for adaptability within defined boundaries, fostering a balance between development goals and environmental stewardship. The NWMO supports the continued reliance on parameter envelopes in shaping the trajectory of future projects and maintaining our commitment to sustainable practices.

Thank you for the opportunity to provide further comments in this matter,

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