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Written submission from Kinectrics

Mémoire de Kinectrics

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Application for a licence to construct one BWRX-300 reactor at the Darlington New Nuclear Project Site (DNNP)

Demande visant à construire 1 réacteur BWRX-300 sur le site du projet de nouvelle centrale nucléaire de Darlington (PNCND)

Commission Public Hearing Part-2

Audience publique de la Commission Partie-2

January 8, 2024

8 janvier 2024





November 4, 2024 Commission Secretariat Canadian Nuclear Safety Commission 280 Slater Street P.O. Box 1046, Station B Ottawa, Ontario K1P 5S9

Public hearing on Ontario Power Generation Inc.'s application for a Licence to Construct one BWRX-300 reactor for its Darlington New Nuclear Project

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' support for Ontario Power Generation Inc.'s (OPG's) application for a Licence to Construct (LTC) one BWRX-300 reactor for its Darlington New Nuclear Project (DNNP).

Kinectrics is a proudly Canadian company committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters is in Etobicoke, Ontario with offices in Pickering, Toronto, Bruce County, the United States, Germany, Denmark, Romania, the United Kingdom and India. We operate over 30 laboratories including CNSC-licensed nuclear facilities and employ more than 1,300 staff, 70% of whom have technical, science or engineering degrees.

Kinectrics is committed to the successful deployment of clean energy technologies, including new nuclear technologies in Canada and around the world. We share OPG's vision that a new BWRX-300 reactor on the Darlington site would benefit all Ontarians while positioning Durham Region and Ontario as the clean energy capital of the world. Building on OPG's leadership in this area, Kinectrics is also investing in innovation to support clean energy and to tackle the effects of climate change head on. Kinectrics is supported by over 100 companies and consultants on our Approved Suppliers List. Combined with our suppliers, Kinectrics' support of OPG contributes to the employment of hundreds of high-quality, knowledge-based jobs.



Kinectrics provides a broad range of services to OPG related to the DNNP, including:

- Supported OPG's site preparation licence renewal efforts between 2018 to 2020 through review of the licence renewal plan, and the development of an Aggregate Assessment report confirming the validity of the existing licensing basis for the new licensing period.
- Provided full-time seconded staff who acted as Owner's Engineers to support DNNP in design engineering, human factors, and nuclear safety and contributed to the development of the Preliminary Safety Analysis Report (PSAR) and the LTC application.

In providing services to OPG, Kinectrics' staff interface with OPG staff across their nuclear organization. This includes approximately 100 Kinectrics staff who work directly at OPG sites. Our core principle is: "Safety is our culture. Quality is our promise". Having extensive experience working closely with OPG, we can confirm they share this principle. OPG's effective management of their facilities provides a safe work environment for our staff. Kinectrics on-site staff are trained in, and adhere to, OPG's rigorous procedures in nuclear, conventional and radiation safety and environmental protection.

OPG's continuous improvement programs, directed at both OPG and vendor staff, ensure high safety standards are maintained. Evidence of OPG's continuous improvement culture is demonstrated through their commitment to self-reflection and awareness, including their frequent participation with Kinectrics in joint quality review and lessons learned meetings.

OPG openly shares and seeks operating experience through formal industry forums such as those facilitated by CANDU Owners Group and routinely goes beyond formal forums to share project specific experience with other utilities and vendors.

With respect to protection of the environment, Kinectrics provides analytical and environmental services that support environmental assessments and monitoring programs. Through the provision of these services for OPG, we affirm they uphold their mandate to continuously monitor effluents while working to minimize environmental impacts. OPG serves a key role in protecting the environment by providing low-carbon energy to the Province of Ontario.



Kinectrics is a proud member of the Canadian Council for Indigenous Business (CCIB), which aims to strengthen the relationship between Indigenous and non-Indigenous peoples, businesses, and communities. In this regard, we are pleased to work with OPG, which is also a member of the CCIB and has demonstrated a strong commitment to work towards meaningful engagement with Indigenous peoples and to further Indigenous business involvement in the supply chain. OPG created an Indigenous Opportunities Network (ION) designed to increase the number of Indigenous people working in the nuclear industry by placing them in the building trades on some of OPG's most diverse and innovative projects. OPG also prepared a Reconciliation Action Plan which functions as a road map for OPG to work in partnership with Indigenous communities, businesses, and organizations to advance reconciliation, and OPG has made meaningful progress on the plan. Kinectrics shares OPG's views in this pursuit and is actively working with Indigenous businesses and Indigenous communities in the regions in which we operate.

In summary, by working closely with OPG over many years and understanding their people, programs, procedures, processes, and safety culture, Kinectrics has observed the commitment to safety and attention to detail which are applied to all OPG projects. Based on these experiences, Kinectrics is confident that OPG is capable and qualified to undertake the construction of a BWRX-300 unit for its DNNP.

On this basis, we support the approval of OPG's application for a LTC one BWRX-300 reactor for its DNNP. If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or david.harris@kinectrics.com.

Sincerely,

David Harris
President and CEO
Kinectrics Inc.