



Oral presentation

Written submission from the Organization of Canadian Nuclear Industries

In the Matter of the

Ontario Power Generation Inc.

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

Commission Public Hearing Part-2

January 8, 2024

Exposé oral

Mémoire de l'Organization of Canadian Nuclear Industries

À l'égard d'

Ontario Power Generation Inc.

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

Audience publique de la Commission Partie-2

8 janvier 2024

November 1, 2024

Re: Request to present an Oral Intervention for Darlington New Nuclear Project in person on January 8, 2025.

Dear Commission,

My name is Brian Fehrenbach from the Organization of Canadian Nuclear Industries (OCNI), representing over 200 Canadian companies in the Canadian nuclear supply chain. OCNI also proudly supports our nuclear utilities, including Ontario Power Generation (OPG), and its plan to construct a GE-Hitachi BWRX 300 at the Darlington site. Below is the text of my intervention.

Hello, my name is Brian Fehrenbach from the Organization of Canadian Nuclear Industries (OCNI), representing over 200 Canadian companies in the Canadian nuclear supply chain. I'm pleased to be here today as both a nuclear professional and a representative of the Canadian nuclear supply chain in support of Ontario Power Generation (OPG)'s application for a license to construct a reactor facility for its Darlington New Nuclear Project (DNNP). OCNI supported OPG in 2022 with the Environmental hearings and review process concluding that the Environmental Assessment applied to the Darlington site in 2012 is applicable and suitable for use with the GE-H BWRX 300 Small Modular Reactor. Now, we wish to provide our support for OPG's request to proceed with the nuclear construction phase.

OCNI is the leading voice of the Canadian nuclear supply chain and its 240 members and associates. Founded in 1979, OCNI actively promotes the production of safe, clean, and reliable nuclear energy, as well as the establishment of the needed infrastructure to carry out and manage nuclear projects in Canada. In 1979, the Canadian nuclear landscape looked different than it does today; it was smaller and had fewer reactors, and as it is today, the industry was anchored by Ontario Power Generation (Ontario Hydro) and its growing nuclear fleet. Our industry has grown and changed over the last 40 years, and Canada is a Tier 1 nuclear nation competing to supply products and services around the world.

And, just as it has for the last 40 years, OCNI is proud to support Ontario Power Generation in its past applications to extend or construct new nuclear projects.

One of the reasons that Canada is a competitive Tier 1 nuclear nation is that we have a long history of safely executing nuclear projects and managing nuclear assets, all under the governance of the Canadian Nuclear Safety Commission (CNSC). For approximately 70 years, the Canadian nuclear industry has developed and refined its expertise as a Tier 1 nuclear country, and this includes its world class nuclear regulatory regime, evidenced through its influence on the nuclear regulatory practices in other CANDU countries and, more recently, in countries that are new to nuclear. The CNSC, through its continuous investigation of new technologies and

international collaboration, I can provide Canadians with a strong and reliable licensing framework for nuclear operators that helps ensure the safest and most robust nuclear activities. Today, as I'm working with Canadian suppliers in countries across Europe, the CNSC is well known and active in promoting regulatory excellence.

To continue our tradition as a strong Tier 1 nuclear country, Canada is embarking on deploying Small Modular Reactors as outlined in our SMR Road Map and Action Plan, and OPG is poised to lead the way with its plan to construct a GE-H BWRX 300 MW at its Darlington site. OCNI believes this is an excellent choice of technology, location, and utility to deploy Canada's first commercial SMR.

The Canadian SMR Road Map defines three categories of SMRs based on their ranges of applications, size and technology readiness in 2022. The GE-H BWRX 300 was placed in Tier 1 and selected by OPG partly because it was the right choice for an early deployment of SMR to produce electricity. The GE line of boiling water reactors is a well-established technology that can be understood and operated safely by OPG. To reach this decision, we know that OPG conducted a very lengthy review process of several SMRs before selecting the BWRX, and it's through this intense review and preparation that I am confident in OPG's technology decision.

OPG's Darlington site received a Site Preparation license in 2012 after an Environmental Assessment and a public hearing, and this license was renewed in 2021 to allow for a quick start on some of the groundwork and infrastructure required to support an eventual SMR. This foresight and planning allowed OPG to choose a site already suitable for a project, such as the GE-H BWRX 300. After selecting the GE-H BWRX 300, OPG reviewed its existing Environmental Impact Assessment, and in April 2024, the CNSC determined the BWRX 300 technology is safely within the existing license. OCNI strongly supports this conclusion.

Now, the time has come for the CNSC to consider OPG's request to continue with the nuclear construction phase in a safe and deliberate manner. This is no different than what OPG has performed so far on its Darlington refurbishment project, demonstrating to Canada that we can execute billion-dollar nuclear projects safely, on time and on budget. The local nuclear workforce and construction support infrastructure are highly trained and specialized, and the site is adequately prepared to allow for a safe construction project.

OPG is one of the best nuclear operators in the world based on assessments by the World Association of Nuclear Operators (WANO), which is evident by the demand for its expertise from other utilities worldwide. It has a track record of safety, operating excellence, transparency and continuous improvement that is second to none in the nuclear industry. Having worked at OPG and its commercial subsidiaries, I know personally how strong its nuclear culture is, and all these traits combined, point to OPG as the best choice for Canada's first GE-Hitachi BWRX 300.

In summary, OCNI strongly supports OPG and its application for a license to construct a GE-H BWRX 300 SMR and encourages the CNSC to issue a license for its construction.

Thank you.

A handwritten signature in black ink, appearing to read "Brian Fehrenbach". The signature is fluid and cursive, with the first name "Brian" written in a larger, more prominent script than the last name "Fehrenbach".

Brian Fehrenbach
Interim CEO, Organization of Canadian Nuclear Industries