



**Written submission from  
Promotion**

**Mémoire de Promotion**

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 1<sup>st</sup>, 2024

Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046,  
Station B Ottawa, ON  
K1P 5S9

Attention: Senior Tribunal Officer, Commission Registry

Subject: Request for Intervention RE: 2024-H-03, Notice of Public Hearing,

*"CNSC to conduct public heading on Ontario Power Generation Inc.'s application for a license to construct one BWRX-300 reactor for its Darlington New Nuclear Project"*

To whom it may concern,

Please accept this request to consider Promation Nuclear Ltd.'s oral and written intervention on the CNSC's upcoming Public Hearing, Part 2, for Ontario Power Generation's [OPG's] application to grant a license to construct the BWRX-300 reactor at the Darlington site.

Promation Nuclear Ltd. is an established Small-Medium sized Enterprise (SME) who's long term viability and success relies on a healthy and sustainable nuclear industry. As such, given our position as a representative SME employing over 50 people, we firmly believe it is very important our voice and position be considered during this hearing, so we may convey and express the impact a license to construct the first commercial SMR in North America at OPG's Darlington site would have on the continued growth and sustainability of our business.

Originally founded in 1995, Promation—a leading designer and manufacturer of high-quality tooling, automation, and robotic systems—is a privately owned Canadian Corporation that embodies its commitment to embracing ethnic, gender, and cultural diversity within our business practices, and we are proud to be an inclusive, socially responsible corporation. Promation Nuclear Ltd has been delivering custom engineered solutions to the nuclear industry for almost 20 years, and has been a reliable Tooling partner to the industry since 2009.

Over this time, OPG and Promation have shared a commitment to a “Safety First” work environment. Our corporate management goal and the goal of our employees is to ensure that everyone returns home safely at the end of each work day. We, together with OPG, continue to enhance our processes and practices to ensure a continued nuclear safety culture is not only maintained, but strengthened. Having worked closely with OPG over the years, their commitment to safety is very evident with their proven record of safe operation as they work towards achieving their long term business goals. As such, we enjoy the privilege of being able to draw inspiration and leadership from them as we advance the effectiveness of our own safety and nuclear culture within our own organization.

Additionally, through OPG's direct efforts to lobby and engage their supply chain to embrace positive Indigenous Relations, Promation Nuclear has begun the journey of awareness and acknowledgement of Indigenous considerations as a core tenement of fundamental business. As a result, we have begun to realize the deep and meaningful understanding of the power Canadian businesses play in manifesting sustainable reconciliation with the nation's indigenous peoples.

Following this, Promation is increasingly playing a leading role in the Nuclear industry from our position as a Canadian SME, and are one of the first Nuclear SME's to join the Canadian Council of Indigenous Business (CCIB), and further, to sign on to their Partnership Accreditation in Indigenous Relations (PAIR) program. Through the PAIR program, we have developed and implementing embedded policies and procedures to manifest meaningful initiatives to increase Indigenous content within our procurement practices, and have created increased employment opportunities for indigenous peoples within our organization.

As the recent announcements, acknowledgements, and investments by historically non-traditional Nuclear parties—such as Amazon, Google, and Microsoft—evidence, successful domestic deployment of commercial-grade SMR's are paramount to ensuring the continued long-term viability and relevancy of companies such as ours in the rapidly developing global SMR marketplace.

Accordingly, granting the license to construct the first BWRX-300 at OPG's Darlington site is an existentially defining milestone for Canada and the corresponding supply chain necessary to ensure we entrench our global position as world-leading stewards of this technology for low-carbon, reliable, enabling power generation for emergent industries, such as data centers, and other distributed power generation supply demands.

In short, were it not for OPG's ongoing operations, and industry leadership in hosting the continent's first commercial-grade SMR, and their leadership in promoting awareness and fostering localization and Indigenous engagement, Promation would not have engaged in the manner in which we have, and we would be a lesser company for it.

In summary, given the significant impact the CNSC's granting of a License to OPG for constructing a BWRX-300 SMR on the Darlington site has on Promation Nuclear's ongoing viability, the substantial community development and economic prosperity in the region, and our pursuit to ingrain and manifest meaningful reconciliation initiatives with the Indigenous peoples, we request the granting of our request for both a written and oral intervention on the Public Hearings being held on January 8<sup>th</sup>, 2025.

Sincerely,



Darryl Spector, P.Eng, PMP  
President