

**OPG DNNP Requests for Confidentiality – CNSC Staff Feedback on OPG’s Additional Justification to be Granted Confidentiality**

Document	CNSC Staff Review	Additional Justification from OPG	Additional Review from CNSC Staff
<p>NK054-REP-01210-00170, BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Alternative Approach Report</p>	<p>CNSC staff find that OPG’s rationale to withhold portions of the document is insufficient.</p> <p>CNSC staff find that OPG’s proposed public summary does not present an accurate summary of the document in question.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-01210- 00170 confidential is recommended.</p>	<p>This document contains commercially sensitive, proprietary design information for the BWRX-300 with respect to specific items that constitute an alternate approach to REGDOC 2.5.2. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has been consistently treated as confidential.</p> <p>A redacted version of NK054-REP-01210-00170 was submitted with the confidentiality request.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the redacted version and conclude that the redacted version contains sufficient descriptive information regarding the alternative approach to REGDOC-2.5.2 criteria proposed by the applicant.</p>
<p>NK054-PLAN-01210-00008 – Darlington New Nuclear Project: Program Management Plan (R002)</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-0008 confidential is recommended.</p>	<p>This document contains information that is commercially sensitive to OPG, as it describes the organization of the project, the hierarchy of the various project plans and their interconnections, the details scope of the project activities and the various programs that support the project with their detailed roles. This plan is based on OPG extensive knowledge, experience and lessons learned from previous and current OPG projects and holds commercial value. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this plan has consistently been treated as confidential.</p> <p>The OPG CMD and the LTC application contain sufficient information to be an accurate public summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff accept that the CMD and the LTC application contain a satisfactory description of the purpose of the Program Management Plan in OPG's Nuclear Management System.</p>

<p>NK054-PLAN-01210-00100 – DNNP Construction Program Management Plan (Sheet 9, R000)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>NK054-PLAN-01210-00100 (Sheet 9) aligns with the content provided in OPG's proposed public summary and references existing OPG governance documentation.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100 (Sheet 9) confidential is recommended.</p>	<p>This document lays out the details of how OPG performs oversight of its construction program. It lays out part of the process developed by OPG over the years to successful execution of large complex projects within budget and on schedule while also maintaining high WANO ratings. If this document were disclosed, vendors would be able to strategize their contracts around OPG's oversight model, and other utilities could use the model, which was developed using OPG's time and resources, to obtain a commercial benefit. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD and LTC application contain an accurate summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>OPG's CMD and the LTC application contain a satisfactory description of the purpose of the Program Management Plan in OPG's Nuclear Management System.</p>
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<p>DA1-IPD-NN-NN-TPLN-DI-0009 Configuration Management Plan (CMP) (R000)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>CNSC staff are of the opinion that Sections 1 through 4 of the document provide a discussion similar to that provided in OPG's written CMD.</p> <p>A request for additional justification to support the request to deem the entire DA1-IPD-NNNN-TPLN-D1-0009 confidential is recommended</p>	<p>This document contains the Integrated Project Development (IPD) team's approach to managing configuration during the design, procurement, construction, and commissioning phases of the project. This document is treated as confidential as it lays out a process developed collaboratively between the DNNP integrated project partners Ontario Power Generation (OPG), GEH, AtkinsRéalis, and Aecon, based on those parties' collective years of experience successfully executing large, complex projects. Public disclosure of this information would provide both potential vendors and competitors with a methodology for managing configuration that holds commercial value. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The specific sections mentioned by CNSC staff (Section 1 through 4), contain much more detailed information than the CMD. These details include the interpretation of regulations, codes, and standards associated with Configuration Management, the interaction between project parties, the approach to graded application of configuration management, and supporting references.</p> <p>The OPG CMD and LTC application contain an accurate summary of this document</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient. CNSC staff recommend the Commission request OPG to provide a redacted version of this document for public disclosure.</p> <p>CNSC staff conclude that sections 1 through 3 (~45% of the document) contain more detailed descriptions of the configuration management program that is in-line with publicly available information from CNSC regulatory documents, CSA standards, etc.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>
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<p>DA1-IPD-NN-NN-TPVS-PM- 0001 – Darlington Small Modular Reactor: Project Execution Plan (PEP) (R C02)</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>The contents of this document, up to section 4, are in accordance with statements made throughout OPG’s written CMD.</p> <p>A request for additional justification to support the request to deem the entire DA1-IPD-NNNN-TPLN-PM-0001 confidential is recommended</p>	<p>This document contains commercially sensitive information as it describes the organization and details of the work in the nuclear island portion of the project, including the project management and progression aspects as well as field engineering, construction, procurement, oversight of design and other aspects. This has been developed based on extensive knowledge and experience of OPG personnel and from lessons learned of previous and current project and holds commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document.</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient. CNSC staff recommend the Commission request OPG to provide a redacted version of this document for public disclosure.</p> <p>CNSC staff reviewed OPG's additional justification and amended its previous determination. Sections 1 and 2 (~30% of the document) contain high-level descriptions of general engineering oversight principles.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>
<p>NK054-PLAN-01210-00100 – DNNP Project Assurance Program Management Plan (Sheet 2, R002)</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100 confidential is recommended.</p>	<p>This document contains commercially sensitive information as it describes the various review and reporting means through which assurance is provided that DNNP will achieve its objectives. It describes the various levels of oversight and reporting specific to DNNP. This plan was developed based on extensive knowledge and experience from both OPG and external projects and holds commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient and recommend the Commission request OPG to provide this document for public disclosure or a redacted version.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>

<p>NK054-PLAN-01210-00108 – Integrated Project Execution Plan (Sheet 1, R000)</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>The contents of this document, up to section 4, are in accordance with statements made throughout OPG’s written CMD.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00108 confidential is recommended.</p>	<p>This document contains commercially sensitive information as it describes the execution of the DNNP project using an integrated project delivery model, and how various entities can collaborate and make decisions. This information is based on the extensive knowledge and experience of all the vendors involved as well as OPG and holds commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document.</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient and recommend the Commission protect Sections 4 onwards.</p> <p>CNSC staff conclude Sections 1 through 3 (~55% of the document) are consistent with statements OPG has made in its CMD.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>
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<p>NK054-PLAN-01210-00035 – DNNP Engineering Oversight Plan (R001)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>CNSC staff are of the opinion that the content of this document, up to section 3, is in line with general engineering oversight principles and in accordance with statements made in OPG's written CMD.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-0035 confidential is recommended.</p>	<p>This document outlines OPG's approach to providing owner's oversight of engineering activities during the design, procurement, construction, and commissioning phases of the project. This document is treated as confidential as it details a process developed by OPG based on years of experience successfully applying oversight to large, complex projects. Disclosure of this information would provide both potential vendors and competitors with a proprietary methodology. Accordingly, this document has consistently been treated as confidential.</p> <p>The specific sections mentioned by CNSC staff (Section 1 through 3) contain much more detailed information than what is summarized in OPG's CMD. These details include the interpretation of regulations, codes, and standards associated with owner's oversight activities, the interaction between project parties, the approach to graded application of engineering oversight, and supporting references. All of these detailed methodologies required significant time and expertise of OPG staff to develop and document, and thus hold commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document.</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient and recommend the Commission protect Sections 3 onwards.</p> <p>CNSC staff conclude Sections 1 through 2 (~30% of the document) are consistent with statements OPG has made in its CMD.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>
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<p>NK054-PLAN-01210-00100-0004, DNNP Engineering Program Management Plan, Sheet 4, revision R000</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100-0004 confidential is recommended.</p>	<p>This document outlines OPG's approach to organizing the engineering function during the design, procurement, construction, and commissioning phases of the project. This document is treated as confidential as it details an organizational and programmatic structure developed by OPG based on years of experience successfully applying oversight to large, complex projects. Public disclosure of this information would provide both potential vendors and competitors with a proprietary methodology for engineering project management.</p> <p>Significant methodology details include defining OPG's mission and objectives, organizational structure, interface and interaction with other development partners, governance and program scope and structure, performance measurement and reporting, and supporting references. All of these methodologies required significant time and expertise of OPG staff to develop and document, and thus hold commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and conclude that the document describes the organisation of the engineering function for the DNNP in substantive detail.</p>
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<p>NK054-PLAN-01210-00014 – Roles and Responsibilities for Darlington New Build Engineering (R001)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>The contents of NK054-PLAN- 01210-00014 align with the descriptions of the Functional and Execution Project Management Teams (PMT) defined in OPG's written CMD.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00014 confidential is recommended.</p>	<p>This document outlines OPG's approach to organizing the engineering function during the design, procurement, construction, and commissioning phases of the project. This document is treated as confidential as it details an organizational structure developed by OPG based on years of experience successfully applying oversight to large, complex projects. Public disclosure of this information would provide both potential vendors and competitors with a proprietary methodology for organizational structure development. This document contains much more detailed information than what is included in OPG's CMD, including the definition of the engineering organizational structure and division of responsibilities. All of these aspects required significant time and expertise of OPG staff to develop and document, and thus hold commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provides an accurate summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and conclude the document details the responsibilities of the New Build Engineering organisation and its structure. CNSC staff accept OPG's justification and that the CMD provides a representative description of the functional structure of this organisation.</p>
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<p>NK054-PLAN-01210-00100 – DNNP Document Management Plan (R000)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100 confidential is recommended.</p>	<p>This document contains commercially sensitive information as it describes the process for transfer of documents between OPG and GEH (i.e. the BWRX-300 designer). It describes the project document repository, document classification and version control methodologies as well as other aspects of document management for DNNP. This information for the project holds commercial value, particularly as it relates to first-of-a-kind methodologies. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD provide an accurate summary of this document as this project falls under the OPG information management governance.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG. The referenced section in the CMD provides high-level information regarding OPG's information governance.</p>
<p>DA1-SNC-Y99-RNN-TSPC-GT-0001 – Excavation and Backfill Specifications for Power Block Area (R000)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire DA1-SNCY99-RNN-TSPC-GT-0001 confidential is recommended</p>	<p>This document outlines the engineering specifications developed to perform soil removal and replacement for the power block area of DNNP Unit 1. This document is treated as confidential as it details specific engineering requirements developed by the DNNP project to execute soil replacement activities based on the engineering and technical knowledge and experience of the DNNP integrated project delivery partners none of whom have consented to disclosure of this document. Public disclosure of this information would provide both potential vendors and competitors with DNNP proprietary methodologies which hold commercial value. In particular, the details of regulatory, codes, and standards interpretations, technical requirements for execution, quality control measures, acceptance, and documentation criteria required significant time and expertise of DNNP Project Partner organizations' staff to develop and document, and thus hold commercial value. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential</p> <p>OPG CMD Section 3.2 is an adequate public summary.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and accept that this document is a technical engineering specification which is specific to the project and is not suited for public disclosure.</p>

<p>NK054-PLAN-01210-00100-0015, DNNP (Project Controls) Program Management Plan, Sheet 15</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>CNSC staff find that subsection 15.5.9.3 of OPG's PSAR presents information regarding out-of-core criticality assessments.</p> <p>A request for additional justification for why subsection 15.5.9.3 of the PSAR is not proposed as a sufficient public summary of NK054-REP-01210- 00191 is recommended.</p>	<p>This document contains commercially sensitive information as it includes insights into several aspects of project management, such as Work Breakdown Structure, for a project that is first-of-a-kind based on previous OPG project management knowledge and experience. Project controls in an integrated project delivery model are not common and hold commercial value to OPG. This document has gone through multiple years of drafting, revisions etc. by experienced project controls staff. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD and LTC application contain sufficient information to be an accurate summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and accept OPG's additional justification that this document should be withheld as it describes sensitive project information.</p>
<p>NK054-PLAN-01210-00100-0017 DNNP Supply Chain Program Management Plan, Sheet 17</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>OPG's proposed public summary does not present an accurate summary of the document in question.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100-0017 confidential is recommended.</p>	<p>This document contains commercially sensitive information as it describes the supply chain process developed and implemented for the DNNP project. This information is based on extensive knowledge and experience from each of the companies involved in this project and holds commercial value to OPG. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD and LTC application contain sufficient information to be an accurate summary of this document.</p>	<p>CNSC staff find OPG's additional justification for protecting the entire document to be insufficient and recommend the Commission request OPG to provide this document for public disclosure or a redacted version.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and determined that the document provides high-level information on the supply chain program management plan.</p> <p>Should OPG chose to withdraw this document CNSC staff would have to assess the impact this had on the recommendations and conclusions described in CMD 24-H3.</p>

<p>DA1-IPD-NN-NN-TPLN-QA- 0001 Darlington New Nuclear Project Functional Quality Management Plan</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>OPG's proposed public summary does not present an accurate summary of the document in question.</p> <p>A request for additional justification to support the request to deem the entire DA1-IPD-NNNN-TPLN-QA-0001 confidential is recommended</p>	<p>This is a commercially sensitive document as it contains insight to Non owner partners' Quality Management Systems and project quality plans, details on managed systems and its hierarchy and information on roles and accountabilities of non-owner partners and their respective organizations structures. The document contains sufficient information such that it could be used by trained individual to reproduce OPG Project execution and Quality Assurance structure.</p> <p>This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD section 4.1 serves as the public summary for this document</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and accept OPG's additional justification that this document should be withheld as it describes sensitive project information.</p>
<p>NK054-DP-01210-00001 – Darlington New Nuclear Project Integrated Project Design Plan (IPDP)</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>OPG's proposed public summary does not present an accurate summary of the document in question.</p> <p>A request for additional justification to support the request to deem the entire NK054-DP- 01210-00001 confidential is recommended.</p>	<p>This document outlines the division of responsibility and Design Authorities between OPG and GEH engineering functions for the project. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. Public disclosure of this information would provide both potential vendors and competitors with a detailed, commercially valuable methodologies related to the division of design responsibilities. The division of design responsibilities required significant time and expertise of OPG and its Project Partner organizations' staff to develop and document, and thus hold commercial value. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD section 4.1 serves as the public summary for this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and accept OPG's additional justification that this document should be withheld as it describes sensitive project information..</p>

<p>NK054-MAN-01210-00002 – BWRX 300 DNNP ALARA Design Criteria for Canada</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>Staff find that the proposed public summary is not acceptable.</p> <p>CNSC staff find that, although the PSAR has sufficient description of ALARA in design, Sections 1-8 of NK054-MAN-01210-00002 should be made publicly available.</p> <p>A request for additional justification to support the request to deem the entire NK054-MAN- 01210-00002 confidential is recommended.</p>	<p>This document contains commercially sensitive information as it describes the criteria and considerations required for achieving design that includes the concept of as-low-as—reasonably achievable for each system, for a project that is first-of-a-kind. This is a unique process that has been incorporated into the design documentation of each individual BWRX-300 system. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 12 as well as OPG CMD section 4.5 contain sufficient information to serve as the public summary.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and determined that Chapter 12 of the PSAR has sufficient information to provide a summary of this document.</p>
<p>NK054-REP-01210-00186 – BWRX 300 Darlington New Nuclear Project (DNNP) Important to Safety and Safety-Related Terminology</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>OPG’s proposed public summary does not present an accurate summary of the document in question.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP- 01210-00186 confidential is recommended.</p>	<p>This document is technical in nature and commercially sensitive as it explains how safety classification terms as defined and used in various regulatory jurisdictions correlate to the classification of BWRX-300 SSC for the BWRX-300 DNNP project. The document holds commercial and technical value in that it provides assessment details and conclusions for applicability of BWR technology, and the BWRX-300 in particular, to regulatory frameworks used in the US and Canada, and in IAEA documents. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 3 is an accurate public summary of this document</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and accept OPG's additional justification that this document should be withheld as it describes sensitive project information.</p>

<p>NK054-REP-01210-00184 – BWRX 300 Darlington New Nuclear Project (DNNP): Structures, Systems, and Components Classification Report</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP- 01210-00184 confidential is recommended.</p>	<p>This document holds commercial and technical value as it presents the methodology for classification of SSCs for the BWRX-300 with respect to Safety Class, Seismic Category and Quality Group. It provides evidence of the classification principles, includes reliability targets for defense line functions, and includes design requirements for SSCs. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 3 is an accurate public summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and found that subsection 3.2 of the PSAR provides suitable information on safety classification.</p>
<p>NK054-PLAN-01210-00100 – Darlington New Nuclear Project: Licensing Program Management Plan (Sheet 8)</p>	<p>CNSC staff find that OPG’s rationale to withhold the entire document is insufficient.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 01210-00100 confidential is recommended</p>	<p>This document contains commercially sensitive information as it describes OPG's conduct of regulatory affairs as it pertains to the DNNP project. It describes the details of the various tasks, roles, responsibilities and incorporates extensive OPG knowledge and experience from operation of its existing fleet as well as current and previous projects. This document holds commercial value as it could be used by other organizations to establish a new management system. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG CMD and LTC application provide an accurate summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and found that aspects of this document could be considered proprietary (forward looking).</p>

<p>NK054-REP-02730-00001, BWRX 300 Flood Hazard Assessment</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>Staff find that the PSAR provides an accurate representation of the document.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP- 02730-00001 confidential is recommended.</p>	<p>This document outlines the approach and results of flood hazard assessments conducted for the DNNP project. Relevant key findings have been extracted and included in the Preliminary Safety Analysis Report (PSAR) from this work. This document is treated as confidential as it documents the details associated with the application of regulations, codes, and standards along with site specific information to produce an assessment of flood hazard potential for the DNNP project. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated by OPG as confidential.</p> <p>The PSAR chapter 2 provides a public summary of this assessment.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG and found that subsections 2.6.4 and 2.12.4 of the PSAR provide suitable information.</p>
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<p>NK054-PLAN-07007-00001, Darlington New Nuclear Project Strategy for Addressing Climate Change Impacts</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>Staff find that the PSAR provides an accurate representation of the document.</p> <p>A request for additional justification to support the request to deem the entire NK054-PLAN- 07007-00001 confidential is recommended</p>	<p>This document outlines OPG's strategy for conducting a climate change vulnerability and risk assessment for the proposed DNNP facility. Relevant key findings have been extracted and included in the Preliminary Safety Analysis Report (PSAR) from this work. This document is treated as confidential as it details a methodology and approach to executing a climate vulnerability and risk assessment that was specifically developed by OPG based on extensive experience and expertise. Public disclosure of this information would provide both potential vendors and competitors with a proprietary methodology. The details of this methodology include the interpretation of a complex and evolving regulatory, codes, and standards landscape, and the development of a unique and customized approach and methodology to be applied to the DNNP project. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD section 4.5 provides an accurate public summary of this document</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG, and conclude that document contains a methodology that could be considered proprietary.</p>
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<p>NK054-REP-07007-00001, Darlington New Nuclear Project Phase 1 Climate Change Risk Assessment Summary Report</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>Staff find that the PSAR does not provide an accurate representation of the document.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP- 07007-00001 confidential is recommended.</p>	<p>Document NK054-REP-07007-00001 DNNP Phase 1 Climate Change Risk Assessment Summary outlines OPG's methodology and results of a climate change vulnerability and risk assessment for the proposed DNNP facility. Relevant key findings have been extracted and included in the Preliminary Safety Analysis Report (PSAR) from this work. This document is treated as confidential as it contains data, methodology, and approaches specifically developed by OPG based on extensive previous experience and expertise. Public disclosure of this information would provide both potential vendors and competitors with a proprietary methodology. These details of this methodology include climate change data development, methodology, risk tolerance details, and results that represent a unique and customized approach applied to the DNNP project. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD section 4.5 provides an accurate public summary of this document</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG, and conclude that document contains a methodology that could be considered proprietary.</p>
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<p>NK054-REP-07007-00002, Darlington New Nuclear Project Phase 2 Climate Change Risk Treatment</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>Staff find that the PSAR does not provide an accurate representation of the document.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-07007-00002 confidential is recommended</p>	<p>This document outlines OPG's approach to risk treatments for items identified during the climate change vulnerability and risk assessment for the proposed DNNP facility. Relevant key findings have been extracted and included in the Preliminary Safety Analysis Report (PSAR) from this work. This document is considered confidential as it contains risk treatment details specifically developed by OPG based on extensive previous experience and expertise. Public disclosure of this information would provide both potential vendors and competitors with a proprietary methodology. This document was created as part of the DNNP integrated project delivery model and none of the parties have consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated by OPG as confidential.</p> <p>OPG CMD section 4.5 provides an accurate public summary of this document.</p>	<p>CNSC staff accept OPG's additional justification and recommend the Commission accept OPG's request for confidentiality for this document.</p> <p>CNSC staff reviewed the document taking into consideration the additional justification provided by OPG, and conclude that document contains a methodology that could be considered proprietary.</p>
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