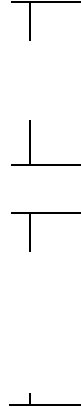




To Candace Salmon
Registrar
Canadian Nuclear Safety Commission
c.c. R. Jammal (EVP-CROO), L. Thiele (LCAB)

From Sarah Eaton
Director General of Directorate of Advanced Reactor
Technologies

De Canadian Nuclear Safety Commission



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Your File - Votre référence 2.01	
Date 25 October 2024	Tel. No. - N° de

Subject CNSC Staff Review of OPG's Requests for Confidentiality in Relation to CNSC Staff
Objet CMD 24-H3 Referenced Documents

1 PURPOSE

The purpose of this memorandum is to provide CNSC staff's comments and recommendations to the Commission regarding the matter of OPG's request to protect from public disclosure four (4) sets of documents in relation to its Licence to Construct application.

2 OPG'S CONFIDENTIALITY REQUESTS

OPG has submitted four (4) Requests for Confidentiality, pursuant to section 12 of the *Canadian Nuclear Safety Commission Rules of Procedure* regulations, as follows:

- [Request for Confidentiality in the Matter of CMD 24-H3 – CNSC Staff Review and Assessment of OPG's Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project Site](#)
- [Request for Confidentiality in the Matter of CMD 24-H3.1 – OPG Written Submission in Support of the Darlington New Nuclear Project Application for a Power Reactor Construction Licence](#)
- [Request for Confidentiality in the Matter of NK054-CORR-00531-10740 – Darlington New Nuclear Project – Submission of Package #3 Security Deliverables in Support of the Licence to Construct Application for CNSC Review](#)
- [Request for Confidentiality in the Matter of NK054-CORR-00531-10775 – Darlington New Nuclear Project – Submission of Package #6b Construction and Commissioning Program Confidential Deliverables in Support of the Licence to Construct Application for the CNSC Review](#)

CNSC staff's review and recommendations are provided in the subsections below.

2.1 CNSC Staff Review of OPG Request for Confidentiality with Respect to CNSC Staff CMD 24-H3

CNSC staff identified several instances where OPG's rationale to withhold the entire document is insufficient and recommended the Commission request that OPG provide additional justification to withhold an entire document from disclosure. In these instances, CNSC staff were not persuaded by OPG's request that protection of the entire document is justified. Protection of portions of the document could be justified, but more justification is needed to support a finding that the entire document requires protection.

In other instances where OPG provided a public summary, CNSC staff found that the summary provided an accurate summary of the document in question. [Attachment 1](#) provides CNSC staff's detailed comments and recommendations to the Commission regarding OPG's confidentiality request for CMD 24-H3.

2.2 CNSC Staff Review of OPG Request for Confidentiality with Respect to OPG's Submission CMD 24-H3.1

CNSC staff identified several instances where OPG's rationale to withhold the entire document is insufficient and recommended the Commission request that OPG provide additional justification to withhold an entire document from disclosure. In these instances, CNSC staff were not persuaded by OPG's request that protection of the entire document is justified. Protection of portions of the document could be justified, but more justification is needed to support a finding that the entire document requires protection.

In other instances where OPG provided a public summary, CNSC staff found that the summary provided an accurate summary of the document in question. [Attachment 2](#) provides CNSC staff's detailed comments and recommendations to the Commission regarding OPG's confidentiality request for CMD 24-H3.1.

2.3 CNSC Staff Review of OPG Request for Confidentiality with Respect to NK054-CORR-00531-10740, Darlington New Nuclear Project – Submission of Package #3 Security Deliverables in Support of the Licence to Construct Application for the CNSC Review

These documents contain significant discussion of prescribed and confidential information related to security matters, and CNSC staff find that OPG has provided sufficient rationale and their request to withhold these documents from disclosure is reasonable. CNSC staff note that this is in accordance with the Commission's existing practice of withholding from public disclosure prescribed information in compliance with the *Nuclear Safety and Control Act* and the *Rules of Procedure Regulations*. [Attachment 3](#) provides CNSC staff's comments and

recommendations to the Commission regarding each document contained within OPG's security confidential submission that OPG wishes to protect from disclosure.

2.4 CNSC Staff Review of OPG Request for Confidentiality with Respect to NK054-CORR-00531-10775, Darlington New Nuclear Project – Submission of Package #6b “Construction and Commissioning Program Confidential Deliverables in Support of the Licence to Construct Application for the CNSC Review”

CNSC staff identified several instances where the rationale to withhold the entire document is insufficient and recommended the Commission request that OPG provide additional justification to withhold an entire document from disclosure. In these instances, CNSC staff were not persuaded by OPG's request that protection of the entire document is justified. Protection of portions of the document could be justified, but more justification is needed to support a finding that the entire document requires protection.

In other instances where OPG provided a public summary, CNSC staff find that the summary provided an accurate summary of the document in question. [Attachment 4](#) provides CNSC staff's comments and recommendations to the Commission regarding each document contained within OPG's submission that OPG wishes to protect from disclosure.

3 CONCLUDING STATEMENTS AND RECOMMENDATIONS

CNSC staff have reviewed OPG's requests for confidentiality and have provided recommendations as to whether the proposed public summaries are accurate representations of the documents in question. Attachments 1 through 4 provide CNSC staff's recommendations to the Commission.

CNSC staff recommend the Commission Registry request OPG to disposition CNSC staff comments on its confidentiality request.

4 REFERENCES

- [1] Commission Registry form from M. Knutson (OPG), *Request for Confidentiality of Material Submitted in Relation to CMD 24-H3: CNSC Staff Review and Assessment of OPG's Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project (DNNP) Site*, dated 26 July 2024.
- [2] Commission Registry form from M. Knutson (OPG), *Request for Confidentiality of Material Submitted in Relation to CMD 24-H3.1: OPG Written Submission in Support of the Hearing on the Application for the Darlington New Nuclear Project Power Reactor Construction Licence*, dated 26 July 2024.
- [3] Commission Registry form from M. Knutson (OPG), *Request for Confidentiality of Material Submitted in Relation to CMD 24-H3: OPG Confidential Security-Protection Submission*

NK054-CORR-00531-10740 – Darlington New Nuclear Project – Submission of Package #3 Security Deliverables in Support of the Licence to Construct Application for CNSC Review, dated 26 July 2024.

- [4] Commission Registry form from M. Knutson (OPG), *Request for Confidentiality of Material Submitted in Relation to CMD 24-H3: CNSC Staff Review and Assessment of OPG's Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project (DNNP) Site, dated 26 July 2024.*


Prepared by:

 Digitally signed by Simon, Nicole
DN: C=CA, O=GC, OU=CNSC-CCSN,
CN="Simon, Nicole"
Reason: I am approving this document
with my legally binding signature
Location:
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Foxit PDF Editor Version: 13.0.1

Nicole Simon

Senior Project Officer, Advanced Reactors Licensing Division
Directorate of Advanced Reactor Technologies

Approved by:

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For

Sarah Eaton

Director General, Directorate of Advanced Reactor Technologies

Attachment 1

CNSC Staff Review of OPG’s Request for Confidentiality in Relation to CNSC Staff CMD 24-H3

Reference Materials submitted in this Request for Confidentiality:

- CMD 24-H3.1 (Submission from OPG) – *Application for a Licence to Construct one BWRX-300 Reactor at the Darlington New Nuclear Project Site (DNNP)*
- OPG Report, “Ontario Power Generation Inc. Darlington New Nuclear Project: BWRX-300 Preliminary Safety Analysis Report” NK054-SR-01210-00001 R01, Chapters 2, 3, 4, 9A, 12, 13, 15.
- OPG Document, Darlington New Nuclear Project – Application for a Licence to Construct a Reactor Facility
- *NK054-CORR-00531-10829 DNNP – CNSC Staff Response to OPG Responses to CNSC Staff Comments on Probabilistic Safety Assessment Methodology and Hazards Analysis Methodology*

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
Vol. 1, Reference R2.1-6	NK054-PLAN-01210-0008 – <i>Darlington New Nuclear Project: Program Management Plan (R002)</i>	Entire Document Document is commercially sensitive	OPG’s written CMD, Section 4.1 pg. 51	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-0008 confidential is recommended.
Vol. 1, Reference R2.1-7	NK054-PLAN-01210-00100 – <i>DNNP Construction Program Management Plan (Sheet 9, R000)</i>	Entire Document Document is commercially sensitive	OPG’s written CMD, Section 4.1	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. NK054-PLAN-01210-00100 (Sheet 9) aligns with the content provided in OPG’s proposed public summary and references existing OPG governance documentation. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100 (Sheet 9) confidential is recommended.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
Vol. 1, Reference R2.1-26	DA1-IPD-NN-NN-TPLN-D1-0009 – <i>Configuration Management Plan (CMP)</i> (R000)	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1.3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. 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. A request for additional justification to support the request to deem the entire DA1-IPD-NN-NN-TPLN-D1-0009 confidential is recommended.
Vol. 1, Reference R2.1-27	NK054-PLAN-01210-00100-0019 – <i>DNNP Turnover and Commissioning Program Management Plan</i> (Sheet 19, R001)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1.3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. CNSC staff find that OPG's proposed public summary does not present an accurate representation of the contents of OPG document NK054-PLAN-01210-00100 (Sheet 19). In addition, subsection 4.3.2 of OPG's CMD provides more detailed information regarding Turnover and Commissioning processes than is listed in NK054-PLAN-01210-00100 (Sheet 19). A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100-0019 – <i>DNNP</i> confidential is recommended.
Vol. 1, Reference R2.1-8	DA1-IPD-NN-NN-TPLN-PM-0001 – <i>Darlington Small Modular Reactor: Project Execution Plan (PEP)</i> (Rev C02)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1 pg 52	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. The contents of this document, up to section 4, are in accordance with statements made throughout OPG's written CMD. A request for additional justification to support the request to deem the entire DA1-IPD-NN-NN-TPLN-PM-0001 confidential is recommended.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
Vol. 1, Reference R2.1-9	NK054-PLAN-01210-00100 – <i>DNNP Project Assurance Program Management Plan</i> (Sheet 2, R002)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1 pg 52	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100 confidential is recommended.
Vol. 1, Reference R2.1-10	NK054-PLAN-01210-00108 – <i>Integrated Project Execution Plan</i> (Sheet 1, R000)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1 pg 52	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. The contents of this document, up to section 4, are in accordance with statements made throughout OPG's written CMD. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00108 confidential is recommended.
Vol. 1, Reference R2.1-11	NK054-PLAN-01210-0035 – <i>DNNP Engineering Oversight Plan</i> (R001)	Entire Document Document is commercially Sensitive	OPG's written CMD, Sections 4.1 and 4.5.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. 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. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-0035 confidential is recommended.
Vol. 1, Reference R2.1-28	NK054-PLAN-01210-00100-0004 – <i>DNNP Engineering Program Management Plan</i> , Sheet 4, revision R00	Entire Document Document is commercially Sensitive	OPG's written CMD, Sections 4.1 and 4.5.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100-0004 confidential is recommended.
Vol. 1, Reference R2.1-12	NK054-PLAN-01210-00108 – <i>DNNP Unit 1 Quality Management Plan</i> (Sheet 3, R000)	Entire Document	OPG's written CMD, Section 4.1 pg 52	CNSC staff find that OPG's rationale to withhold the entire document is sufficient.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
		Document is commercially Sensitive		OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.1-14	NK054-PLAN-01210-00108 – <i>IPD Organization Chart</i> (Sheet 16, R000)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1 on pg 53	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG document NK054-PLAN-01210-00108 (Sheet 16) identifies names of individuals in the IPD organization structure. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.1-15	NK054-PLAN-01210-00108 – <i>IPD Team Roles and Responsibilities</i> (Sheet 17)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1.2 on pages 52 & 53	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.1-16	NK054-PLAN-01210-00014 – <i>Roles and Responsibilities for Darlington New Build Engineering</i> (R001)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1.2 on pages 52 & 53	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. 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. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00014 confidential is recommended.
Vol. 1, Reference R2.1-17	NK054-COI-01210-00002 – <i>Contractor/Owner Interface Agreement</i> (R000)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1.2 on pages 52 & 53	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. This document describes, in detail, commercial arrangements between OPG and its non-owner parties, to be executed in the IPD organization. This document is consistently treated as confidential between OPG and its non-owner parties.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
				OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.1-23	NK054-PLAN-01210-00100 – DNNP <i>Document Management Plan</i> (Sheet 18, R000)	Entire Document Document is commercially Sensitive	OPG's written CMD, Section 4.1 on pages 50 & 51	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100 confidential is recommended.
Volume 1, Safety Analysis				
Vol. 1, Reference R2.3-6	NK054-CORR-00531-10837 – DNNP – <i>Responses to CNSC Staff technical Comments #3 on the OPG Application for the Licence to Construct a Reactor Facility</i>	Entire Document Document is commercially Sensitive, technical in Nature, and a technical Matter Currently being Resolved		CNSC staff find that OPG's rationale to withhold the entire document is sufficient. This document is provided to the Commissioners for context, as CNSC staff are still in process of resolving open comments with OPG. CNSC staff have a commitment to publish the status of technical review comments on the open government portal when they are closed.
Vol. 1, Reference R2.4-3	NK054-REP-01210-00144 – BWRX 300 <i>Darlington New Nuclear Project (DNNP) Hazards Analysis Methodology</i> (R000)	Entire Document Document is commercially Sensitive, technical in Nature	OPG's PSAR, Chapter 2	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. Subsection 2.2 of OPG's PSAR describes the categorization and evaluation of internal and external hazards and presents an acceptable summary of the methodologies described in NK054-REP-01210-00144. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.4-4	NK054-REP-01210-00158 – BWRX 300 <i>Darlington New Nuclear Project (DNNP) Hazard Analysis Results</i> (R000)	Entire Document Document is technical in Nature	OPG's PSAR, Chapter 2	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. Subsection 2.2 of OPG's PSAR describes the categorization and evaluation of internal and external hazards and presents an acceptable

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
				summary of the results described in NK054-REP-01210-00158. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.4-18	DA1-SNC-Y99-RNN-TSPC-GT-0001 – <i>Excavation and Backfill Specifications for Power Block Area (R000)</i>	Entire Document Document is technical in Nature	OPG's written CMD, Section 3.2	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire DA1-SNC-Y99-RNN-TSPC-GT-0001 confidential is recommended.
Vol. 1, Reference R2.4-21	NK054-REP-01210-00144 – <i>BWRX 300 DNNP Probabilistic Safety Assessment Methodology</i>	Entire Document Document is commercially sensitive Document is technical in Nature	<i>Note: CNSC CMD Document Number is incorrect, it should be NK054-REP-01210-00143.</i> OPG's PSAR, Chapter 15	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.4-22	NK054-CORR-00531-10829 – <i>DNNP – CNSC Staff Response to OPG Responses to CNSC Staff Comments on Probabilistic Safety Assessment Methodology and Hazards Analysis Methodology</i>	Redacted version provided Document is commercially Sensitive Document is technical in Nature	A redacted version of this document is available.	CNSC staff find that OPG's rationale to withhold commercially sensitive portions of this document is sufficient. OPG's proposed redacted version of this document provides sufficient demonstration of the resolution of early CNSC staff comments on the PSA methodology.
Vol. 1, Reference R2.4-24	NK054-REP-01210-00163 – <i>BWRX 300 Probabilistic Safety Assessment Summary Report</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive	OPG's PSAR, Chapter 15	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
Vol. 1, Reference R2.4-38	NK054-REP-03555-00001 – <i>BWRX-300 Containment Evaluation Method</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Section 15.5	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. Furthermore, staff find that the referenced section of the PSAR is not a sufficient public summary. A request for additional justification to support the request to deem the entire NK054-REP-03555-00001 confidential is recommended.
Vol. 1, Reference R2.4-37	NEDC-33987 – <i>TRACG Application for BWRX 300</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Section 4.3	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 1, Reference R2.4-41	NEDE-32176P – <i>TRACG Model Description</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Section 4.3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. CNSC staff are of the opinion that up to Section 5 of the NEDE-32176P document should be publicly available. It should be noted that CNSC staff were able to find a redacted version of this document from the US Nuclear Regulatory Commission website . A request for additional justification to support the request to deem the entire NEDE-32176P confidential is recommended.
Vol. 1, Reference R2.4-42	NEDE-32177P – <i>TRACG Qualification</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Section 4.4	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. CNSC staff are of the opinion that up to the end of Section 2 of the NEDE-32177P

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
				<p>document should be publicly available.</p> <p>It should be noted that CNSC staff were able to find a redacted version of this document from the US Nuclear Regulatory Commission website.</p> <p>A request for additional justification to support the request to deem the entire NEDE-32177P confidential is recommended.</p>
Vol. 1, Reference R2.4-43	NEDC-32725P – <i>TRACG Qualification for SBWR (Volumes 1 and 2)</i>	<p>Entire Document</p> <p>Document is a matter of national or nuclear security</p> <p>Document is commercially sensitive</p>	OPG's PSAR, Section 15.5	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>It should be noted that CNSC staff were able to find a redacted version of this document from the US Nuclear Regulatory Commission website.</p> <p>A request for additional justification to support the request to deem the entire NEDC-32725P confidential is recommended.</p>
Vol. 1, Reference R2.4-44	NEDC-33080P – <i>TRACG Qualification for ESBWR Class III</i>	<p>Entire Document</p> <p>Document is a matter of national or nuclear security</p> <p>Document is commercially sensitive</p>	OPG's PSAR, Section 15.5	<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. It should be noted that CNSC staff were able to find a redacted version of this document from the US Nuclear Regulatory Commission website.</p> <p>A request for additional justification to support the request to deem the entire NEDC-33080P confidential is recommended.</p>
Vol. 1, Reference R2.4-37	NK054-REP-01210-00164 – <i>TRACG Application for BWRX 300</i>	<p>Entire Document</p> <p>Document is a matter of national or nuclear security</p>	OPG's PSAR, Section 15.5	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p> <p>OPG's proposed public summary presents an accurate summary of the document in question. However, CNSC find that that Sections 1 and 2 of NK054-REP-01210-00164 are narrative and</p>

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
		Document is commercially sensitive		have information that complements OPG's proposed summary. A request for additional justification to support the request to deem the entire NK054-REP-01210 confidential is recommended.
Vol. 1, Reference R2.4-47	NK054-REP-01210-00191 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Out of Core Criticality Safety Analysis Demonstration (R000)</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive	OPG's PSAR, Section 15.5	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. CNSC staff find that subsection 15.5.9.3 of OPG's PSAR presents information regarding out-of-core criticality assessments. 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.
Volume 2, Physical Design				
Vol. 2, Reference R2.5-10	NK054-PLAN-01210-00008 – <i>Darlington New Nuclear Project: Program Management Plan</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1 pg. 51	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00008 confidential is recommended.
Vol. 1, Reference R2.1-29	NK054-PLAN-01210-00100-0015 – <i>DNNP (Project Controls) Program Management Plan, Sheet 15</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100-0015 confidential is recommended.
Vol. 1, Reference R2.1-30	NK054-PLAN-01210-00100-0017 – <i>DNNP Supply Chain Program</i>	Entire Document	OPG's written CMD, Section 4.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
	<i>Management Plan, Sheet 17</i>	Document is commercially sensitive		OPG's proposed public summary does not present an accurate summary of the document in question. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100-0017 confidential is recommended.
Vol. 1, Reference R2.1-32	DA1-IPD-NN-NN-TPLN-QA-0001 – <i>Darlington New Nuclear Project Functional Quality Management Plan</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. A request for additional justification to support the request to deem the entire DA1-IPD-NN-NN-TPLN-QA-0001 confidential is recommended.
Vol. 2, Reference R2.5-12	NK054-DP-01210-00001 – <i>Darlington New Nuclear Project Integrated Project Design Plan (IPDP)</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1.2	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. A request for additional justification to support the request to deem the entire NK054-DP-01210-00001 confidential is recommended.
Vol. 2, Reference R-2.5-15	NK054-COI-01210-00002 – <i>Darlington New Nuclear Project Contractor/Owner Interface Requirements</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1.2	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 2, Reference R2.5-16	NEDO-11209 – <i>GE Hitachi Nuclear Energy Quality Assurance Program Description</i>	Entire Document Document is commercially sensitive	OPG's PSAR, Section 17.2	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
Vol. 2, Reference R2.5-17	NK054-MAN-01210-00002 – <i>BWRX 300 DNNP ALARA Design Criteria for Canada</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.5.4 on pg 82 and PSAR Chapter 12	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. Staff find that the proposed public summary is not acceptable. 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. A request for additional justification to support the request to deem the entire NK054-MAN-01210-00002 confidential is recommended.
Vol. 2, Reference R2.5-18	NK054-REP-01210-00183 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Safety Strategy</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 3	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 2, Reference R2.5-20	NK054-REP-01210-00186 – <i>BWRX 300 Darlington New Nuclear Project (DNNP) Important to Safety and Safety-Related Terminology</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. A request for additional justification to support the request to deem the entire NK054-REP-01210-00186 confidential is recommended.
Vol. 2, Reference R2.5-26	NK054-REP-01210-00184 – <i>BWRX 300 Darlington New Nuclear Project (DNNP): Structures, Systems, and Components Classification Report</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-REP-01210-00184 confidential is recommended.
Vol. 2, Reference R2.5-27	NK054-PROG-60009-00001 – <i>BWRX-300 DNNP Design</i>	Entire Document	OPG's written CMD, Section 4.5.4 on pg 84	CNSC staff find that OPG's rationale to withhold the entire document is insufficient.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
	<i>Reliability Assurance Program</i>	Document is commercially sensitive Document is technical in nature		OPG's proposed public summary does not present an accurate summary of the document in question, as it does not provide sufficient information about the Design Reliability Assurance Program. A request for additional justification to support the request to deem the entire NK054-PROG-60009-00001 confidential is recommended.
Vol. 2, Reference R2.5-28	NK054-PROG-01500-00001 – <i>BWRX-300 Reliability, Availability, Maintainability, and Inspectability Program</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's application document, Section 4.5.3 on pg 120 and PSAR section 13.3	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 2, Reference R2.5-31	NK054-PLAN-01210-00108 – <i>Darlington New Nuclear Project (DNNP) Design Plan: Design Plan (Sheet 5)</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's written CMD, Section 4.1.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. CNSC staff note that subsection 4.5.1, rather than 4.1.1, of OPG's CMD provides an overview of OPG's design plan. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00108 confidential is recommended.
Vol. 2, Reference R2.5-32	NK054-PLAN-01210-00100 – <i>Darlington New Nuclear Project: Licensing Program Management Plan (Sheet 8)</i>	Entire Document Document is commercially sensitive	OPG's written CMD, Section 4.1.1	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-PLAN-01210-00100 confidential is recommended.
Vol. 2, Reference R2.5-40	NK054-REP-01210-00160 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Mechanical Design Report</i>	Entire Document Document is commercially sensitive	OPG's PSAR, Section 4.2.3	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
		Document is technical in nature		
Vol. 2, Reference R2.5-41	NK054-REP-01210-00161 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Thermal-Mechanical Design Report</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Section 4.2.3	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.
Vol. 2, Reference R2.5-55	NK054-REP-01210-00147 – <i>BWRX 300 Darlington New Nuclear Project (DNNP) Preliminary Fire Safe Shutdown Requirement and Analysis</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive	OPG's PSAR, Section 9A.6.3	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. Section 9A.6.2, and other parts of 9A.6 have information on fire safe shutdown, in addition to section 9A.6.3, and should be provided in the public summary. Furthermore, staff recommend that the content of to section 4.1.6 inclusive be included. A request for additional justification to support the request to deem the entire NK054-REP-01210-00147 confidential is recommended.
Volume 3, Environmental Protection				
Vol. 3, Reference R2.8-13	NK054-REP-07730-00064 – <i>Dose Calculations for Human and Non-Human Biota to Support Gap Analysis for DNNP (R001)</i>	Entire Document Document is commercially sensitive	LTC Application, Section 3.1.7 on pg 54	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. A request for additional justification to support the request to deem the entire NK054-REP-07730-00064 confidential is recommended.
Vol. 1, Reference R2.4-7	NK054-REP-02730-00003 – <i>Wind Gust Analysis Memorandum, revision 0</i>	Entire Document Document is a matter of national or nuclear security	OPG's PSAR, Section 2.6.5	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
		Document is commercially sensitive		
Vol. 1, Reference R2.4-11	NK054-REP-02730-00001 – <i>BWRX-300 Flood Hazard Assessment</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG’s PSAR, Section 2.6.4	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. Staff find that the PSAR provides an accurate representation of the document. A request for additional justification to support the request to deem the entire NK054-REP-02730-00001 confidential is recommended.
Vol. 1, Reference R2.4-12	NK054-PLAN-07007-00001 – <i>Darlington New Nuclear Project Strategy for Addressing Climate Change Impacts</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG’s written CMD, Section 4.5.4 pg 85	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. Staff find that the PSAR provides an accurate representation of the document. A request for additional justification to support the request to deem the entire NK054-PLAN-07007-00001 confidential is recommended.
Vol. 1, Reference R2.4-14	NK054-REP-07007-00001 – <i>Darlington New Nuclear Project Phase 1 Climate Change Risk Assessment Summary Report</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG’s written CMD, Section 4.5.4 pg 85	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. Staff find that the PSAR does not provide an accurate representation of the document. A request for additional justification to support the request to deem the entire NK054-REP-07007-00001 confidential is recommended.
Vol. 1, Reference R2.4-15	NK054-REP-07007-00002 – <i>Darlington New Nuclear Project Phase 2 Climate Change Risk Treatment</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG’s written CMD, Section 4.5.4 pg 85	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. Staff find that the PSAR does not provide an accurate representation of the document. A request for additional justification to support the request to deem the entire NK054-REP-

Reference Number, Volume Number	Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
				07007-00002 confidential is recommended.
Vol. 2, Reference R2.5-48	GEH 006N2631 – <i>BWRX-300 Plant-Level Instrumentation and Control Architecture Design Assurance Plan</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's written CMD, Section 2.4.1	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. OPG's proposed public summary presents an accurate summary of the document in question.

Attachment 2

CNSC Staff Review of OPG’s Request for Confidentiality in Relation to OPG Written CMD 24-H3.1

Reference Materials submitted in this Request for Confidentiality:

- CMD 24-H3.1 (Submission from OPG) – *Application for a Licence to Construct one BWRX-300 Reactor at the Darlington New Nuclear Project Site (DNNP)*
- OPG Report NK054-SR-01210-00001 – *Ontario Power Generation Inc. Darlington New Nuclear Project: BWRX-300 Preliminary Safety Analysis Report*, revision 1, Chapters 2, 3, 4, 9A, 12, 13, 15.
- OPG Document – *Darlington New Nuclear Project – Application for a Licence to Construct a Reactor Facility*
- NK054-REP-01210-00172 – *BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Compliance Matrix Report*
- NK054-REP-01210-00170 – *BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Alternative Approach Report*
- NK054-REP-03500-00001 – *Independent Peer Review of the Preliminary Safety Analysis Report (PSAR) for the Darlington New Nuclear Project*

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
NK054-REP-01210- 00140 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Design Description Qualification and BWR Fuel Licensing</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG’s PSAR, Section 4.2	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. CNSC staff find that subsection 4.2 of the PSAR provides a description, but does not provide details, on fuel acceptance criteria that supports design and safety analysis. A request for additional justification to support the request to deem the entire NK054-REP-01210- 00140 confidential is recommended.
NK054-REP-01210- 00147 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Preliminary Fire Safe Shutdown Requirement and Analysis Document</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive / Document is technical in nature	OPG’s PSAR, Section 9A.6.3	CNSC staff find that OPG’s rationale to withhold the entire document is insufficient. CNSC staff find that section 9A.6.2, in addition to 9A.6.3 and other sections of 9A.6 of the PSAR also present information on the fire safe shutdown assessment and should be included in the public summary.

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
			<p>In addition, CNSC staff recommend that the content up to and including section 4.1.6 should be included in the public summary.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-01210- 00147 confidential is recommended.</p>
<p>NK054-REP-01210- 00167 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Preliminary Fire Hazards Assessment Report</i></p>	<p>Entire Document Document is a matter of national or nuclear security Document is commercially sensitive Document is technical in nature</p>	<p>OPG's PSAR, Section 9A.6</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p> <p>OPG's proposed public summary presents an accurate summary of the document in question. The entirety of section 9A.6 is adequate for the proposed public summary.</p> <p>However, staff recommend that the content of this document through subsection 4.1.9 inclusive of OPG document NK054-REP-01210-00167 should be included in the proposed public summary.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-01210- 00167 confidential is recommended.</p>
<p>NK054-REP-01210- 00168 – <i>BWRX-300 DNNP Fire Protection System Preliminary Code Compliance Review Report</i></p>	<p>Entire Document Document is a matter of national or nuclear security Document is commercially sensitive Document is technical in nature</p>	<p>OPG's PSAR, Section 9A.6</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p> <p>OPG's proposed public summary presents an accurate summary of the document in question. The entirety of section 9A.6 is adequate for the proposed public summary.</p> <p>However, staff recommend that the content of this document through section 4 of NK054-REP-01210-00168 should be included in the proposed public summary.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-01210- 00168 confidential is recommended.</p>
<p>NK054-REP-01210- 00169 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Independent Third- Party</i></p>	<p>Entire Document</p>	<p>OPG's PSAR, Section 9A.6</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p>

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
<i>Review Report of Preliminary Fire Protection Design</i>	Document is a matter of national or nuclear security Document is commercially sensitive Document is technical in nature		CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-DP-01210- 00002 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Human Factor Engineering Program Plan</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 18	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-REP-01210- 00163 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Probabilistic Safety Assessment Summary</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 15	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-REP-01210- 00158 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) Hazard Analysis Results</i>	Entire Document Document is a matter of national or nuclear security Document is commercially sensitive Document is technical in nature	OPG's PSAR Chapter 2	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. OPG's proposed public summary does not present an accurate summary of the document in question. CNSC staff find that OPG document NK054-REP-01210-00158 contains information that is provided in both Chapters 2 and 15 of the PSAR; however, OPG proposes only including Chapter 2. CNSC staff recommend that Chapter 15 of the PSAR should also be referenced as part of the proposed public summary for this document. A request for additional justification to support the request to deem the entire NK054-REP-01210- 00158 confidential is recommended.

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
NK054-REC-08130-1049591 – <i>DNNP SMRI Level 0 Schedule</i>	Entire Document Document is commercially sensitive	OPG's LTC Application Figure 1.1-2	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-REP-01210- 00145 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Bundle Information Report for Equilibrium 12- Month Cycle</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 4	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-REP-01210- 00146 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Equilibrium 12-Month Cycle Nuclear Design Report</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 4	CNSC staff find that OPG's rationale to withhold the entire document is sufficient. CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.
NK054-REP-01210- 00159 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Steady State Nuclear Methods: TGBLA06/PANAC11 Application Methodology</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 4	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. CNSC staff find that OPG's proposed public summary does not present an accurate summary of the document in question. CNSC staff find that the content of this document to subsection 3.2.5 inclusive contains information that complements the proposed public summary and recommend that it be included. A request for additional justification to support the request to deem the entire NK054-REP-01210- 00159 confidential is recommended.
NK054-REP-01210- 00160 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Mechanical Design Report</i>	Entire Document Document is commercially sensitive Document is technical in nature	OPG's PSAR, Chapter 4	CNSC staff find that OPG's rationale to withhold the entire document is insufficient. CNSC staff find that OPG's proposed public summary does not present an accurate summary of the document in question. CNSC staff find that the content of this document to subsection 4.6 inclusive complements the proposed

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG's Proposed Public Summary	CNSC Staff Comments
			<p>public summary and should be included.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-01210- 00160 confidential is recommended.</p>
<p>NK054-REP-01210- 00161 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Thermal- Mechanical Design Report</i></p>	<p>Entire Document Document is commercially sensitive Document is technical in nature</p>	<p>OPG's PSAR, Chapter 4</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p> <p>CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.</p>
<p>NK054-REP-01210- 00162 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Pressure Drop Characteristics</i></p>	<p>Entire Document Document is commercially sensitive Document is technical in nature</p>	<p>OPG's PSAR, Chapter 4</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p> <p>CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.</p>
<p>NK054-REP-01210-00164 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) TRACG Application</i></p>	<p>Entire Document Document is commercially sensitive Document is technical in nature</p>	<p>OPG's PSAR, Chapter 4</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is sufficient.</p> <p>CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.</p>
<p>NK054-REP-01210- 00172 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Compliance Matrix Report</i></p>	<p>Entire Document Document is commercially sensitive Document is technical in nature</p>	<p>Redacted version enclosed</p>	<p>CNSC staff find that OPG's rationale to withhold portions of the document is sufficient.</p> <p>CNSC staff find that OPG's proposed public summary presents an accurate summary of the document in question.</p>
<p>NK054-REP-01210- 00170 – <i>BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Alternative Approach Report</i></p>	<p>Entire Document Document is commercially sensitive Document is technical in nature</p>	<p>Redacted version enclosed</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>NK054-REP-03420-00001 – <i>BWRX-300 Occupational Dose Assessment Report</i></p>	<p>Entire Document</p>	<p>OPG's written CMD, Section 4.7.4</p>	<p>CNSC staff find that OPG's rationale to withhold the entire document is insufficient.</p>

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
	<p>Document is a matter of national or nuclear security</p> <p>Document is commercially sensitive</p> <p>Document is technical in nature</p>		<p>CNSC staff find that OPG’s proposed public summary does not present an accurate summary of the document in question, as it does not reflect the content in report NK054-REP-03420-00001.</p> <p>A request for additional justification to support the request to deem the entire NK054-REP-03420-00001 confidential is recommended.</p>
<p>NK054-REP- 03500-00001 – <i>Independent Peer Review of the Preliminary Safety Analysis Report (PSAR) for the Darlington New Nuclear Project</i></p>	<p>Entire Document</p> <p>Document is technical in nature</p>	<p>Redacted version enclosed</p>	<p>CNSC staff find that OPG’s rationale to withhold portions of the document is sufficient.</p> <p>CNSC staff find that OPG’s proposed public summary presents an accurate summary of the document in question.</p>

Attachment 3

CNSC Staff Review of OPG’s Request for Confidentiality in Relation to OPG Submission NK054-CORR-00531-10740 – *Darlington New Nuclear Project – Submission of Package #3 Security Deliverables in Support of the Licence to Construct Application for the CNSC Review*

Reference Materials submitted in this Request for Confidentiality:

- NK054-SR-01210-00001 R001, Preliminary Safety Analysis Report (PSAR) chapters 1, 2, 3, 13 and 14

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
NK054-REP-00531-10000 – <i>Construction Site Threat and Risk Assessment – New Nuclear at Darlington (R003)</i>	Entire Document Document is a matter of national or nuclear security	OPG’s written PSAR	CNSC staff find that OPG’s rationale to withhold the entire document is sufficient. Staff find that OPG’s request is consistent with existing practices in dealing with, and handling, documents and matters relating to security of nuclear facilities.
NK054-REP-61400-00001 – <i>Preliminary Safety Analysis Report (PSAR) Security Annex: Darlington BWRX-300 Security Assessment (R000)</i>	Entire Document Document is a matter of national or nuclear security	OPG’s written PSAR	CNSC staff find that OPG’s rationale to withhold the entire document is sufficient. Staff find that OPG’s request is consistent with existing practices in dealing with, and handling, documents and matters relating to security of nuclear facilities.

Attachment 4

CNSC Staff Review of OPG’s Request for Confidentiality in Relation to OPG Submission *DNNP – Submission Package #6(b) Construction and Commissioning Program Confidential Deliverables in Support of the Licence to Construct Application for CNSC Review*

Reference Materials submitted in this Request for Confidentiality:

- NK054-SR-01210-00001 R001, Preliminary Safety Analysis Report (PSAR) chapters 1, 2, 3, 13 and 14

Document Name	Portion(s) to be Deemed Confidential / Reason for Request	OPG’s Proposed Public Summary	CNSC Staff Comments
NK054-CORR-00531-10775 – <i>DNNP – Submission Package #6(b) Construction and Commissioning Program Confidential Deliverables in Support of the Licence to Construct Application for the CNSC Review</i>	Entire Document Document is commercially sensitive	Redacted summary version provided	CNSC staff find that OPG’s rationale to withhold the entire document is sufficient. CNSC staff find that OPG’s proposed public summary presents an accurate summary of the document in question.