

**OPG Proprietary**

November 18, 2024

CD# NK054-CORR-00531-11142

**Ms. CANDACE SALMON**  
Commission RegistrarCanadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, ON  
K1P 5S9

Dear Ms. Salmon:

**DNNP- OPG Response to Commission's Letter on Requests for Confidentiality in 24-H3 — Ontario Power Generation's Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project**

The purpose of this letter is to provide further justification on OPGs Request for Confidentiality [R-1] for identified documents by the Commission. [R-2].

In support of the hearing on Ontario Power Generation Inc. Application for a Licence to construct one BWRX-300 reactor for its Darlington New Nuclear Project (Part 2), OPG submitted three (3) Request for Confidentiality Forms documented in [R-2]. Subsequently the CNSC Commission requested further justification for confidentiality for a subset of documents, as listed in [R-1]. Attachment 1 provides the requested justification for the identified documents. GE Hitachi intends to submit a correspondence on this subject.

Should you have any questions or require additional information, please contact Ms. Sevana Bedrossian, Senior Manager, Regulatory Affairs – DNNP Licensing at (416) 716 3879 or by email at [sevana.bedrossian@opg.com](mailto:sevana.bedrossian@opg.com).

Sincerely,



Mark R. Knutson, P.Eng.  
Senior Vice President  
Chief Enterprise Engineer and Chief Nuclear Engineer

Ontario Power Generation Inc.

Attached

cc: S. Eaton - CNSC (Ottawa)  
R. Jammal - CNSC (Ottawa)  
M. Broeders - CNSC (Ottawa)  
B. Rzentkowski - CNSC (Ottawa)  
D. Ouellette - CNSC (Ottawa)  
N. Simon - CNSC (Ottawa)  
A. Asongtia - CNSC (Ottawa)  
M. Naraine - CNSC (Ottawa)  
A. Tanase - CNSC (Ottawa)  
K. Fice - CNSC (Ottawa)  
Y. Sheik Mamode - CNSC (Ottawa)  
DNNP Mailbox - CNSC (dnp-npnd@cnscccsn.gc.ca)

Reference:

1. CNSC Letter, M. Young to K.McMeekin "Re: Requests for Confidentiality in 24-H3 — Ontario Power Generation's Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project", NK054-CORR-00531-11129, E-DOC# 7394826, October 29, 2024.
2. OPG Correspondence "DNNP Request For Confidentiality Forms For Licence To Construct Application And CNSC Commission Member Document References", CD# NK054-CORR-00531-11062, July 26, 2024.

**Attachment 1**

**OPG DNNP Requests for Confidentiality - Documents Requiring Further  
Justification to be Granted Confidentiality**

**Prepared By: S. Bedrossian**

**Checked By: C. Mathias**

## **OPG DNNP Requests for Confidentiality - Documents Requiring Further Justification to be Granted Confidentiality**

### **Section 1.0 – Justification for Confidentiality in respect of Commercial and IP Confidential Information**

This section of the submission applies to all of the individual justifications set out below that relate to a claim for confidential protection of information that is proprietary intellectual property or is otherwise commercial confidential information (hereinafter referred to “Commercial and IP Confidential Information”, or the “CIPCI”). These justifications are non-exhaustive and are those of OPG, exclusively, which means that others may have additional justifications. The subject information is regarded by the owner(s) of the information as confidential, proprietary and has consistently been treated by the respective owners in that way. There has never been any intention that the information be publicly disclosed.

The claim for confidential protection of CIPCI is made pursuant to section 12(1)(b) of the CNSC Rules and it is respectfully requested that the measures to protect the information be as set out in subsections 12(3)(b) of the Rules.

The Darlington New Nuclear Project (the “Project”) Commercial and IP Confidential Information includes the Intellectual Property, trade secrets or other highly confidential and proprietary information of OPG and its vendors, including GEH, Atkins Realis and AECON. In all instances the Commercial and IP Confidential Information is either:

- Based on or developed from information brought to the Project through OPG or its vendor partners from OPG’s or their extensive expertise, experience, lessons learned, Research & Development, project execution and other means and opportunities acquired over many years/decades.
- Newly developed as part of the execution of the Project for the deployment of a First of a Kind (FOAK) nuclear technology, through a novel integrated project delivery model that creates a thoroughly integrated one team approach to executing the complex nuclear Project.

Creating the CIPCI and maintaining the confidentiality of this information has required significant financial expenditure and investment, and therefore the CIPCI has significant financial value as an asset.

Whether existing or newly developed Commercial and IP Confidential Information, as set out above, this information, particularly given its FOAK nature, has significant commercial value in the market and its public disclosure will:

- Substantially devalue or eradicate the value of the assets of Intellectual Property rights, trade secrets and/or the proprietary nature of the Commercial and IP Confidential Information of OPG and its other owners.
- Provide the Commercial and IP Confidential Information to others for free, thereby unjustly enriching those who did not make the investments like OPG and the others did, and putting the owners of the CIPCI at a significant commercial disadvantage and high risk for overall commercial loss. Public disclosure of the CIPCI will pass undue commercial benefit and advantage to others globally, including other potential parties wanting to deploy the BWRX-300 technology.
- In respect of other parties wanting to deploy the BWRX-300 technology, public disclosure of the CIPCI will give these others the ability to replicate OPG’s Project information, which is paid for by the ratepayers of Ontario, with significant cost savings essentially funded by Ontario’s ratepayers. This in turn will create a significant unfair divide, from both a cost and risk perspective, between OPG and its

vendor partners as first movers and others that follow. In addition, public disclosure of the CIPCI could reasonably be expected to interfere with contractual or other negotiations with third parties.

If the Commission does not protect the Commercial and IP Confidential Information and decides instead to take a broad approach to public disclosure of such submitted Project information, this will very directly operate as a significant deterrent to other nuclear technology developers and vendor partners who may wish to deploy such technology in Canada.

## **Section 2.0 – Justification for Confidentiality in respect of US Export Controlled Information**

This section of the submission applies to all of the individual justifications set out below that relate to a claim for confidential protection of information that is subject to export controls under the United States’ nuclear regulatory regime. In connection with the Project, information has been disclosed to OPG, and subsequently to its vendor partners, by GEH that is subject to export controls under the regulatory authority of the National Nuclear Safety Administration under the United States’ Department of Energy (the “US Controlled Information”). OPG and its vendor partners have received the US Controlled Information in accordance with regulatory and contractual conditions that constrain further dissemination. The publication of US Controlled Information would violate those conditions by providing unrestricted access to members of the public, including persons in or from jurisdictions to which the transfer of US Controlled Information may not be authorized. Accordingly, OPG requests confidential treatment of the US Controlled Information.

The claim for confidential treatment of US Controlled Information is made pursuant to sections 12(1)(a) and 12(1)(b) of the CNSC Rules, and it is respectfully requested that the measures to protect the information be as set out in subsection 12(13)(b) of the Rules. Section 3.0, below, identifies each document that contains US Controlled Information.

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### Section 3.0 – Justification for Confidentiality in respect of Individual Documents

Document	Justification
<u><a href="#">Request for Confidentiality of Material Submitted in Relation to CMD #24-H3.1</a></u>	
NK054-REP-01210- 00140, BWRX-300Darlington New Nuclear Project (DNNP) GNF2 Fuel Design Description Qualification and BWR Fuel Licensing	<p>This document contains GEH proprietary, commercially sensitive and technical information related to the BWRX-300 GNF2 fuel design and qualification. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information on the GNF2 fuel design and qualification to serve as the public summary and a redacted version of this document was made available to CNSC staff.</p>
NK054-REP-01210- 00167, BWRX-300 Darlington New Nuclear Project (DNNP) Preliminary Fire Hazards Assessment Report	<p>This document contains nuclear security and prescribed information, as well as technical and commercially sensitive information. It describes various areas of the facility design and their risk significance with respect to fire, design details of the BWRX-300 and discussion of mitigation equipment, path and measures. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>PSAR chapter 9A Section 9A.6 contains sufficient information and is an adequate public summary and a redacted version of this document was made available to CNSC staff.</p>
NK054-REP-01210- 00168, BWRX-300 DNNP Fire Protection System Preliminary Code Compliance Review Report	<p>This document contains nuclear security and prescribed information, as well as technical and commercially sensitive information. It describes the details of the design and assessment that confirm code compliance for fire protection and design details of the BWRX-300. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI). Accordingly, this document has consistently been treated as confidential.</p> <p>PSAR chapter 9A Section 9A.6 contains sufficient information and is an adequate public summary and a redacted version of this document was made available to CNSC staff.</p>

<p>NK054-DP-01210- 00002, BWRX-300 Darlington New Nuclear Project (DNNP) Human Factor Engineering Program Plan</p>	<p>This document contains prescribed information, as well as technical and commercially sensitive information. It describes the details of the BWRX-300-specific human factors engineering program and the process and criteria employed. 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). Additionally, this document also contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>PSAR chapter 18 contains sufficient information and is an adequate public summary and a redacted version of this document was made available to CNSC staff.</p>
<p>NK054-REC-08130-1049591, DNNP SMR1 Level 0 Schedule</p>	<p>This document contains commercially sensitive information. It describes the details of the DNNP project activities, durations and their logic which relies on resourcing and other commercially sensitive information. 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’s Licence to Construct Application Figure 1.1-2 contains sufficient information and is an adequate public summary.</p>
<p>NK054-REP-01210- 00145, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Bundle Information Report for Equilibrium 12- Month Cycle</p>	<p>This document contains GEH proprietary, commercially sensitive and technical information related to the BWRX-300 GNF2 fuel design and equilibrium analysis. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information on the GNF2 fuel design and qualification to serve as the public summary.</p>
<p>NK054-REP-01210- 00146, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Equilibrium 12-Month Cycle Nuclear Design Report</p>	<p>This document contains GEH proprietary, commercially sensitive and technical information related to the BWRX-300 GNF2 fuel design and equilibrium analysis. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information on the GNF2 fuel design and qualification to serve as the public summary.</p>

<p>NK054-REP-01210- 00159, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Steady State Nuclear Methods: TGBLA06/PANAC11 Application Methodology</p>	<p>This document contains proprietary information that would result in financial harm to GEH if released. It is owned by GEH and describes methodology and results for analysis of GNF2 fuel. It is considered prescribed nuclear information. Further, GEH has not consented to the disclosure of this document, and the document has been consistently treated as confidential. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has been consistently treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information to serve as the public summary.</p>
<p>NK054-REP-01210-00160, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Mechanical Design Report</p>	<p>This document contains proprietary and detailed technical information on the Global Nuclear fuel (GNF2) fuel design, including components, arrangements, specifications and results of evaluations to show compliance with regulatory requirements for BWR fuel. It is of technical and commercial nature and would be considered prescribed nuclear information. Further, GEH has not consented to the disclosure of this document. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has been consistently treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information to serve as the public summary.</p>
<p>NK054-REP-01210-00161, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Thermal Mechanical Design Report</p>	<p>This document contains proprietary and detailed technical information on the Global Nuclear fuel (GNF2) fuel design, including thermal mechanical design and behaviour information to show compliance with regulatory requirements for BWR fuel. It is of technical and commercial nature and would be considered prescribed nuclear information. Further, GEH has not consented to the disclosure of this document. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has been consistently treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information to serve as the public summary and a redacted version of this document was made available to CNSC staff.</p>
<p>NK054-REP-01210- 00162, BWRX-300 Darlington New Nuclear Project (DNNP) GNF2 Fuel Assembly Pressure Drop Characteristics</p>	<p>This document contains proprietary and detailed technical information on the Global Nuclear fuel (GNF2) fuel design, including pressure drop characteristics and analysis information to show compliance with regulatory requirements for BWR fuel. It is of technical and commercial nature and would be considered prescribed nuclear information. Further, GEH has not consented to the disclosure of this document. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has been consistently treated as confidential.</p> <p>The PSAR chapter 4 contains sufficient information to serve as the public summary.</p>



<p>NK054-REP-01210- 00172, BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Compliance Matrix Report</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-01210-00172 was submitted with the confidentiality request.</p>
<p>NK054-REP-01210- 00170, BWRX-300 Darlington New Nuclear Project (DNNP) REGDOC-2.5.2 Alternative Approach Report</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>NK054-REP-03420-00001, BWRX- 300 Occupational Dose Assessment Report</p>	<p>This document contains proprietary information on the projected collective dose estimate based on the BWRX-300 design information as well as various personnel roles and tasks. This information is proprietary and technical to the design of the facility and its expected operational organization. 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). Additionally, this document also contains US Export Controlled Information. This document has been consistently treated as confidential.</p> <p>The OPG licence to construct application as well as written CMD section 4.7 contain sufficient information to serve as public summary and a redacted version of this document was made available to CNSC staff.</p>
<p>NK054-REP-03500-00001, Independent Peer Review of the Preliminary Safety Analysis Report (PSAR) for the Darlington New Nuclear Project</p>	<p>This document contains proprietary technical information for the BWRX-300 with respect to detailed review of the Preliminary Safety Analysis Report and supporting document. 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). Additionally, this document also contains US Export Controlled Information. This document has been consistently treated as confidential.</p> <p>A redacted version of NK054-REP-03500-00001 was submitted with the confidentiality request and a redacted version of this document was made available to CNSC staff.</p>

Request to Protect Confidential Information in the Matter of OPG Confidential DNNP Submission Package #6(b) Construction and Commissioning Program Confidential Deliverables in Support of the Licence to Construct Application for the CNSC Review

<p>Documentary Information Summary DNNP Licence to Construct – CNSC Financial Guarantee, NK054-REP-00531-10004-R001</p> <p>Note: OPG initially submitted Rev 0 but amended the submission package on November 15, 2023, to include Rev 1 of this document instead.</p>	<p>This document contains commercially sensitive, proprietary design information for the BWRX-300 with respect to the determination of the project scope and financial guarantee amount. 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 public summary of this report was submitted with the licence to construct amended application package #6b as part of NK054-CORR-00531-10891.</p>
<p>Conventional Dismantling Cost Estimate for the Darlington New Nuclear Project As-Built Facility, N-REP-00962.2-00002, R000</p>	<p>This document contains commercially sensitive, proprietary design information for the BWRX-300 with respect to the determination of the project scope and cost of decommissioning the as-built facility. 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 public summary of this report was submitted with the licence to construct application package #6b as part of NK054-CORR-00531-10775.</p>
<p>Decommissioning Cost Study for the Darlington New Nuclear Project – End of Life, N-REP-00962.2-00003, R000</p>	<p>This document contains commercially sensitive, proprietary design information for the BWRX-300 with respect to the determination of the project scope and cost of decommissioning the facility at the end of its life cycle. 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 public summary of this report was submitted with the licence to construct application package #6b as part of NK054-CORR-00531-10775.</p>

*Request for Confidentiality of Material Submitted in Relation to CMD #24-H3*

<p>NK054-PLAN-01210-00008 – Darlington New Nuclear Project: Program Management Plan (R002)</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>NK054-PLAN-01210-00100 – DNNP Construction Program Management Plan (Sheet 9, R000)</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>DA1-IPD-NN-NN-TPLN-DI-0009 Configuration Management Plan (CMP) (R000)</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>
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<p>NK054-PLAN-01210-00100- 0019, DNNP Turnover and Commissioning Program Management Plan (Sheet 19, R001)</p>	<p>This document is treated as confidential as it lays out part of the process developed by OPG over the years to successfully execute large complex projects within budget and on schedule while also maintaining high WANO ratings. Sharing this information with the public will provide both potential vendors but also competitors with a methodology for managing turnover and 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>OPG's CMD provides an accurate summary of this document.</p>
<p>DA1-IPD-NN-NN-TPVS-PM- 0001 – Darlington Small Modular Reactor: Project Execution Plan (PEP) (R C02)</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>NK054-PLAN-01210-00100 – DNNP Project Assurance Program Management Plan (Sheet 2, R002)</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>

NK054-PLAN-01210-00108 – Integrated Project Execution Plan (Sheet 1, R000)

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.

The OPG CMD provides an accurate summary of this document.

<p>NK054-PLAN-01210-00035 – DNNP Engineering Oversight Plan (R001)</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>NK054-PLAN-01210-00100- 0004, DNNP Engineering Program Management Plan, Sheet 4, revision R000</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>NK054-PLAN-01210-00108 – DNNP Unit 1 Quality Management Plan (Sheet 3, R000)</p>	<p>This document contains commercially sensitive information as it describes the management of quality assurance programs across the DNNP project using an integrated project delivery model, and the process and integration of quality assurance across various entities. 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>NK054-PLAN-01210-00108 – IPD Organization Chart (Sheet 16, R000)</p>	<p>This document contains commercially sensitive information as it describes the project organization, key roles and support roles across the DNNP project using an integrated project delivery model, and the titles and positions of the various staff and teams involved in the project. 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>NK054-PLAN-01210-00108 – IPD Team Roles and Responsibilities (Sheet 17)</p>	<p>This document contains commercially sensitive information as it describes the key roles, responsibilities and authorities across all parties of the DNNP project using an integrated project delivery model, and the titles and positions of the various staff and teams involved in the project. 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>NK054-PLAN-01210-00014 – Roles and Responsibilities for Darlington New Build Engineering (R001)</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>NK054-COI-01210-00002 – Contractor/Owner Interface Agreement (R000)</p>	<p>This document contains commercially sensitive information as it is a supporting document to the DNNP integrated project delivery commercial agreement and describes the parties involved, the project scope, and various other items and how interface between the parties is set up and managed using an integrated project delivery model. 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>

NK054-PLAN-01210-00100 – DNNP Document Management Plan (R000) (Sheet 18, R000)

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.

The OPG CMD provide an accurate summary of this document as this project falls under the OPG information management governance.

<p>DNNP – Responses to CNSC Staff Technical Comments #3 on the OPG Application for the Licence to Construct a Reactor Facility OPG Correspondence #NK054-CORR-00531-10837</p>	<p>This document contains commercially sensitive, and technical information for the BWRX-300 and is currently being resolved with CNSC staff. This document was provided to the Commission for context as CNSC staff are still in the process of resolving open comments. 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) and contains US Export Controlled Information. This document has been consistently treated as confidential.</p>
<p>NK054-REP-01210-00144 – BWRX 300 Darlington New Nuclear Project (DNNP) Hazards Analysis Methodology (R000)</p>	<p>This document contains prescribed information, as well as technical and commercially sensitive information. It describes the details methodology for hazard analysis for the DNNP BWRX-300 as well as the sources of information required for the analysis. 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>PSAR chapter 2 contains sufficient information and is an adequate public summary</p>
<p>NK054-CORR-01210- 1015770 – Engineering Direction for Darlington New Nuclear Project Design Basis Tornado Values (R000)</p>	<p>This document contains nuclear security, prescribed, technical and commercially sensitive information. It describes the information used and the analysis done to define the tornado hazard for the DNNP project as part of the DNNP hazard analysis for the design of the BWRX-300. 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 2 provides an adequate public summary of this assessment.</p>
<p>DA1-SNC-Y99-RNN-TSPC-GT- 0001 – Excavation and Backfill Specifications for Power Block Area (R000)</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>
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<p>NK054-REP-01210-00143 – BWRX 300 DNNP Probabilistic Safety Assessment Methodology</p>	<p>This document contains prescribed information, as well as technical and commercially sensitive information. It describes the details methodology for hazard analysis for the DNNP BWRX-300 as well as the sources of information required for the analysis. 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>PSAR chapter 15 contains sufficient information and is an adequate public summary</p>
<p>NK054-CORR-00531-10829 DNNP – CNSC Staff Response to OPG Responses to CNSC Staff Comments on Probabilistic Safety Assessment Methodology and Hazards Analysis Methodology</p>	<p>This document contains commercially sensitive and technical information which was provided to CNSC staff in response to their comments on these DNNP specific methodology 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>A redacted version of this document has previously been made available.</p>
<p>NK054-REP-03555-00001 – BWRX-300 Containment Evaluation Method</p>	<p>This document contains commercially sensitive and technical information which was provides the methodology developed for evaluation of the BWRX-300 containment. This document was created by GEH and GEH has not consented to its disclosure. Accordingly, this document has consistently been treated as confidential.</p> <p>A public version of this document was previously provided to CNSC staff, which can be made available.</p>
<p>NEDC-33987 – TRACG Application for BWRX-300</p>	<p>This document contains nuclear security prescribed and commercially sensitive information as it describes the GEH proprietary code TRACG used to model reactor phenomena. It describes the structure, purpose and uses of the code. This information is of nuclear security significance. This document is owned by GEH and the owner has not consented to its disclosure. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 15 serves as the public summary for this document.</p>

<p>NEDE-32176P – TRACG Model Description</p>	<p>This document contains commercially sensitive and technical information which was provides the methodology developed for evaluation of the BWRX-300 containment. This document was created by GEH and GEH has not consented to its disclosure. Accordingly, this document has consistently been treated as confidential.</p> <p>A redacted version of this document, is available on the US Nuclear Regulatory Commission website <a href="http://www.nrc.gov">www.nrc.gov</a>, for reference. The TRACG Application itself is US Export Controlled Information.</p>
<p>NEDE-32177P – TRACG Qualification</p>	<p>This document contains commercially sensitive and technical information which was provides the methodology developed for evaluation of the BWRX-300 containment. This document was created by GEH and GEH has not consented to its disclosure. Accordingly, this document has consistently been treated as confidential.</p> <p>A redacted version of this document, is available on the US Nuclear Regulatory Commission website <a href="http://www.nrc.gov">www.nrc.gov</a>, for reference. The TRACG Application itself is US Export Controlled Information.</p>
<p>NEDC-32725P – TRACG Qualification for SBWR (Volumes 1 and 2)</p>	<p>This document contains commercially sensitive and technical information which was provides the methodology developed for evaluation of the BWRX-300 containment. This document was created by GEH and GEH has not consented to its disclosure. Accordingly, this document has consistently been treated as confidential.</p> <p>A redacted version of this document, is available on the US Nuclear Regulatory Commission website <a href="http://www.nrc.gov">www.nrc.gov</a>, for reference. The TRACG Application itself is US Export Controlled Information.</p>
<p>NEDC-33080P – TRACG Qualification for ESBWR Class III</p>	<p>This document contains commercially sensitive and technical information which was provides the methodology developed for evaluation of the BWRX-300 containment. This document was created by GEH and GEH has not consented to its disclosure. Accordingly, this document has consistently been treated as confidential.</p> <p>A redacted version of this document, is available on the US Nuclear Regulatory Commission website <a href="http://www.nrc.gov">www.nrc.gov</a>, for reference. The TRACG Application itself is US Export Controlled Information.</p>

<p>NK054-REP-01210-00164 – TRACG Application for BWRX-300</p>	<p>This document contains nuclear security, prescribed information and commercially sensitive information as it describes the GEH proprietary code TRACG used to model reactor phenomena. It describes various cases analysis and details of the application of the code and results which describe reactor behaviour include in transients. This information is of nuclear security significance. GEH has not consented to the public disclosure of its proprietary information. This document contains Commercial and IP Confidential Information (CIPCI) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The PSAR chapter 15 contains an accurate public summary of this document.</p>
<p>NK054-REP-01210-00191 – BWRX-300 Darlington New Nuclear Project (DNNP) Out of Core Criticality Safety Analysis Demonstration (R000)</p>	<p>Commission has deemed this as confidential as per the Partial Record of Decision released on October 29, 2024.</p>
<p>NK054-PLAN-01210-00100-0015, DNNP (Project Controls) Program Management Plan, Sheet 15</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>NK054-PLAN-01210-00100-0017 DNNP Supply Chain Program Management Plan, Sheet 17</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</p>

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<p>DA1-IPD-NN-NN-TPLN-QA- 0001 Darlington New Nuclear Project Functional Quality Management Plan</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>NK054-DP-01210-00001 – Darlington New Nuclear Project Integrated Project Design Plan (IPDP)</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>NEDO-11209 – GE Hitachi Nuclear Energy Quality Assurance Program Description</p>	<p>This document contains GEH commercially sensitive information related to the GEH quality assurance program. This document is owned by GEH and the owner has not 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 17.2 contains sufficient information to serve as the public summary for this document.</p>

NK054-MAN-01210-00002 – BWRX 300 DNNP  
ALARA Design Criteria for Canada

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.

The PSAR chapter 12 as well as OPG CMD section 4.5 contain sufficient information to serve as the public summary.

<p>NK054-REP-01210-00183 – BWRX-300 Darlington New Nuclear Project (DNNP) Safety Strategy</p>	<p>This document is technical in nature and commercially sensitive as it explains how the safety classification and defence-in-depth concepts from IAEA are implemented for the BWRX-300 SSC and the overall BWRX-300 DNNP design. 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>NK054-REP-01210-00186 – BWRX 300 Darlington New Nuclear Project (DNNP) Important to Safety and Safety-Related Terminology</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>NK054-REP-01210-00184 – BWRX 300 Darlington New Nuclear Project (DNNP): Structures, Systems, and Components Classification Report</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>

NK054-PROG-60009-00001 – BWRX-300 DNNP  
Design Reliability Assurance Program

This document contains technical and commercially sensitive information in that it has proprietary GEH information which describes the general principles/considerations and requirements for the D-RAP program and implementation, based on design for reliability plan. GEH has not consented to the public disclosure of this document. This document contains Commercial and IP Confidential Information (CIPCI). Additionally, this document also contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.

OPG CMD section 4.5 is an accurate public summary of this document.

<p>NK054-PROG-01500-00001 – BWRX-300 Reliability, Availability, Maintainability, and Inspectability Program</p>	<p>This document holds commercial and technical value as it describes the reliability, availability, maintainability and inspectability program specifically developed for the DNNP BWRX-300. 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>The OPG application document section 4.5.3 as well as PSAR chapter 13 is an accurate public summary of this document.</p>
<p>NK054-PLAN-01210-00108 – Darlington New Nuclear Project (DNNP) Design Plan: Design Plan (Sheet 5)</p>	<p>This document contains technical and commercially sensitive information as it describes the design process being used for this project and the various stages of progression, which make reference to specific aspects and documents for completion. This document contains the project vendors' extensive knowledge and experience as well as the technology developers' proprietary design process. 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) and contains US Export Controlled Information. Accordingly, this document has consistently been treated as confidential.</p> <p>OPG CMD section 4 provides an accurate summary of this document.</p>
<p>NK054-PLAN-01210-00100 – Darlington New Nuclear Project: Licensing Program Management Plan (Sheet 8)</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>NK054-REP-01210- 00147, BWRX-300 Darlington New Nuclear Project (DNNP) Preliminary Fire Safe Shutdown Requirement and Analysis</p>	<p>This document contains nuclear security, prescribed, technical and commercially sensitive information. It describes various areas of the facility design and their risk significance with respect to fire, design details of the BWRX-300 and discussion of mitigation equipment, path and measures. 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 9A.6 provides a public summary of this assessment and a redacted version of this document was made available to CNSC staff.</p>

<p>NK054-REP-07730-00064 – Dose Calculations for Human and Non-Human Biota to Support Gap Analysis for DNNP (R001)</p>	<p>This document has been deemed as releasable and is included with this submission.</p>
<p>NK054-REP-02730-00003, Wind Gust Analysis Memorandum, Revision 0</p>	<p>This document contains nuclear security, prescribed, technical and commercially sensitive information. It describes the information used and the analysis done to define the wind hazard for the DNNP project as part of the DNNP hazard analysis for the design of the BWRX-300. 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 2 provides a public summary of this assessment.</p>
<p>NK054-REP-02730-00001, BWRX-300 Flood Hazard Assessment</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>NK054-PLAN-07007-00001, Darlington New Nuclear Project Strategy for Addressing Climate Change Impacts</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</p>

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.

OPG CMD section 4.5 provides an accurate public summary of this document.

<p>NK054-REP-07007-00001, Darlington New Nuclear Project Phase 1 Climate Change Risk Assessment Summary Report</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>NK054-REP-07007-00002, Darlington New Nuclear Project Phase 2 Climate Change Risk Treatment</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>006N2631 BWRX-300 Plant Level Instrumentation and Control Architecture Design Assurance Plan</p>	<p>This document contains GEH commercially sensitive and technical information related to the GEH instrumentation and control design process and quality assurance program. This document is owned by GEH and the owner has not 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 2.4 contains sufficient information to serve as the public summary.</p>



**Summary of Regulatory Commitments, Regulatory Obligations and Regulatory Management Actions Made/Concurrence Requested**

**CD# NK054-CORR-00531-11142**

**Submission Title:** **DNNP- OPG Response to “ Requests for Confidentiality in 24-H3 — Ontario Power Generation’s Application for a Licence to Construct a BWRX-300 Reactor at the Darlington New Nuclear Project”**

**Regulatory Commitments (REGC):**

No.	Description	Date to be Completed
	None	

**Regulatory Management Action (REGM):**

No.	Description	Date to be Completed
	None	

**Regulatory Obligation Action (REGO):**

No.	Description	Date to be Completed
	None	

**Concurrence Requested:** NONE