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Ontario

OPG Proprietary

July 22, 2025

File No.: N-CORR-00531-24642 LOF

Ms. C. Salmon
Commission Registrar
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario, K1P 5S9

Dear Ms. C. Salmon:

Darlington Application to Amend PROL 13.04/2025 to Approve Installation and Operation of Target Delivery Systems (TDS) on Additional Units - Need For a Timely Commission Decision

Reference 1. OPG Letter, A. Grace to C. Salmon, "Darlington NGS - Application for Amendment to the Darlington NGS Power Reactor Operating Licence 13.04/2025 to Approve Installation and Operation of Target Delivery Systems (TDS) on Additional Units", January 23, 2025, CD#NK38-CORR-00531-25802

The purpose of this letter is to reiterate the need for a timely decision in response to Reference 1 for Commission approval to install and operate isotope target delivery systems (TDS) on Darlington Units 1, 3 and 4.

Currently, isotope production at the Darlington station is limited to the TDS that is installed and operating on Unit 2. When the Commission rendered their decision on OPG's application to install TDS on all 4 Darlington units, a condition was included to limit approval to one unit and for OPG to seek Commission approval for installation and operation on additional units. That approval was requested in Reference 1.

Darlington Unit 2 will be shut down for an extended maintenance outage from January 2027 through December 2027. While the unit is shut down, isotope production on Unit 2 will cease for the duration of the outage. Installation of the TDS on the other three Darlington units is critical to sustain the world supply of life saving isotopes.

Specifically, Darlington Unit 3 is to be shut down for routine maintenance and TDS installation in March 2026. Per our licensing basis document, N-PROC-MA-0013, Planned Outage Management, all regulatory approvals required to support

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completion of the outage work need to be received from the CNSC three months prior to the outage. Meeting this milestone is necessary for the station to conduct safe work planning. This milestone is December 15th, 2025.

Missing the 2026 outage window for installing the Unit 3 TDS would have significant consequences for the global medical isotope supply chain. Without the TDS on Unit 3 operational, the production of critical cancer-treating isotopes would be impacted, just as global demand for these therapies is accelerating. As Canada seeks to establish itself as a trusted and reliable supplier of life-saving medical isotopes, any delay in OPG's ability to deliver on this commitment could undermine confidence and impact our reputation in this strategically important sector.

It should be noted that the public has been afforded the opportunity to intervene on the activity of TDS installation and operation at Darlington when OPG first applied to install and operate the TDS on all four Darlington units. Interventions were noted and considered in the Record of Decision on the matter (CNSC document DEC 21-H107 dated October 21, 2021).

Should you require any further information, please contact me at 289-314-3367 or sara.irvine@opg.com.

Sincerely,



Sara Irvine
Vice President
Nuclear Regulatory Affairs
Ontario Power Generation