CMD 25-H2.2

Date: 2025-03-10

Written submission from
<b>Labourers' International Union</b>
of North America (LiUNA)

Mémoire de Labourers' International Union of North America (LiUNA)

In the Matter of the

À l'égard d'

## **Ontario Power Generation Inc.**

**Ontario Power Generation Inc.** 

Application to renew power reactor operating licence for the Darlington **Nuclear Generating Station** 

Demande concernant le renouvellement du permis d'exploitation d'un réacteur de puissance pour la centrale nucléaire de Darlington

**Commission Public Hearing** Part-2

Audience publique de la Commission Partie-2

June 24-26, 2025

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March 10, 2025

Senior Tribunal Officer, Commission Registry Canadian Nuclear Safety Commission 280 Slater St P.O. Box 1046, Station B Ottawa, ON K1P 5S9 Sent via email: <a href="mailto:interventions@cnsc-ccsn.gc.ca">interventions@cnsc-ccsn.gc.ca</a>

On behalf of the Labourers' International Union of North America (LiUNA), I am writing to express our support toward Ontario Power Generation Inc.'s (OPG) application to renew the Power Reactor Operating License (PROL) for the Darlington Nuclear Generating Station (DNGS) for a 30-year term.

As background, united by collective bargaining agreements, LiUNA is a powerhouse of workers who are proud to build Ontario and Canada at large. Our members are a skilled and experienced union workforce who are trained to work safely in the construction and energy industries.

## Ensuring Nuclear is Included in Ontario's Low Carbon Energy Mix

In May 2024, OPG requested authorization from the Canadian Nuclear Safety Commission (CNSC) for the PROL renewal of DNGS, as their current license is set to expire on November 30, 2025. To ensure nuclear power can remain a critical energy source in the province's low carbon energy mix, OPG submitted an application to demonstrate their ability to meet the necessary requirements of the *Nuclear and Safety Control Act* and associated regulations to safely carry out operations at DNGS until November 30, 2055.

Nuclear energy currently provides Ontario with clean, reliable energy that is the foundational resource for meeting increasing demand needs and supporting affordability for ratepayers across the province. OPG is a proven leader in the generation of this energy with more than five decades of experience, adhering to CNSC's rigorous safety standards and meeting them with efficiency, cost effectiveness, and the appropriate oversight. We strongly believe that OPG's well-established track record of nuclear safety and extensive history responsibly operating the DNGS reactors is reflective of both their commitment to a comprehensive safety culture and technical ability across the organization.

CNSC conducts regular inspections, audits, and assessments to ensure that Ontario's nuclear stations adhere to strict safety protocols, and DNGS has consistently met or exceeded CNSC's stringent safety requirements.

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Senior Tribunal Officer, Commission Registry Canadian Nuclear Safety Commission March 10, 2025 ...2

OPG conducts regular environmental monitoring around the station, and in DNGS' long operating life, there has never been a significant release of material from the facility that has impacted public health or the environment. Operator training and the conducting of regular safety drills prepare employees for a myriad of scenarios, which are regularly simulated to ensure readiness for potential events, ensuring that staff can respond quickly and efficiently to any event which may arise.

The ongoing refurbishment of DNGS is an important part of ensuring that the station remains operational and safe for decades to come. OPG has committed to incorporating advanced safety technology and lessons learned from other nuclear operations into the project. This proactive approach helps ensure that the facility can continue to meet the highest standards of nuclear safety well into the future. For this reason, we are strongly supportive of OPG being granted the ability to continue operating this important piece of Canada's clean energy infrastructure until 2055. We also recognize that through the extension of existing operations, thousands of good paying jobs for Ontarians will remain protected.

OPG's nuclear facilities are vital for the affordability and reliability of the province's electricity supply, but also for Ontario and Canada's overall energy security. As the Independent Electricity System Operator's (IESO) updated demand forecast has projected demand to grow by 75 per cent by 2050, with annual consumption rising higher than previously forecasted, LiUNA acknowledges and recognizes the importance of ensuring we are safely investing in nuclear capacity and the preservation of our existing clean energy infrastructure as we plan for the long-term.

In conclusion, we strongly urge CNSC to accept OPG's application to approve the extension of the PROL. LiUNA sees DNGS as a critical component to helping to support Ontario's drive for safe, reliable and affordable electricity for the next three decades.

Thank you for your consideration. With kind regards, I remain

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