



CMD 25-H2.52

Date: 2025-05-08

**Written Submission from
Aecon Group Inc.**

**Mémoire d'
Aecon Group Inc.**

In the matter of the

À l'égard d'

Ontario Power Generation Inc.

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

Ontario Power Generation Inc.

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

24-26 juin 2025

May 8, 2025

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St. PO Box 1046 Stn B
Ottawa ON K1P 5S9

Submitted Electronically

Re: Intervention in support of Ontario Power Generation's application for Renewal of the Darlington Nuclear Generating Station Power Reactor Operating Licence (2025-H-02)

Please accept this as Aecon's written submission expressing our support for Ontario Power Generation's application to renew the Power Reactor Operating Licence for the Darlington Nuclear Generating Station (DNGS).

By way of background, as an experienced construction and infrastructure development company with operations across North America and over 8,000 employees, Aecon is the largest nuclear constructor in Canada. Aecon Nuclear, which employs approximately 3,500 skilled workers and staff, provides a full spectrum of Engineering, Procurement and Construction services and continues to play a critical role in the ongoing success of the three largest nuclear refurbishment projects in Ontario. Aecon is delivering North America's first grid-scale Small Modular Reactor (SMR) through OPG's Darlington New Nuclear Project and is the construction partner for OPG's Darlington and Pickering refurbishments. We are proud of our long-standing relationship with OPG and our continued collaboration in building the next generation of nuclear infrastructure.

Aecon has been safely and successfully executing critical work on the Darlington refurbishment since 2012, which will extend the station's operating life through 2055. The project is more than 85% complete in its 10-year execution phase and continues to achieve strong safety, cost, quality and schedule performance. Units 1, 2 and 3 have successfully been refurbished and returned to service, with the refurbishment of Unit 4 progressing on schedule.

The information provided within OPG's licence renewal application demonstrates its unwavering commitment to continue operating the DNGS safely, while meeting the requirements of the Nuclear Safety and Control Act (NSCA) and associated Regulations. OPG has proven it will continue its licensed activities with adequate provisions to protect the health, safety and security of people and the environment, and maintain national security and measures required to implement international obligations.

Furthermore, Aecon would like to highlight its strong endorsement and support of OPG's application:

- OPG understands the history, impact and responsibility of reconciliation with Indigenous Peoples and continues to lead and take meaningful action to collaboratively work with Indigenous communities through employment opportunities, business development, education, training, social responsibility, community support, sponsorship, and maximizing procurement with established Indigenous businesses to create partnerships that advance economic prosperity.
- OPG has a proven history of safe operations and reliable performance spanning decades at the DNGS and has been internationally recognized as a top-performing nuclear power plant in the world.
- OPG and its experienced partners like Aecon are prepared to carry out the activities outlined in the application, and will ensure the protection of the environment, the health and safety of employees and public, and the safety and security of the site.
- The application directly aligns with the vision of Ontario's proposed *Affordable Energy Act*, which if passed, would prioritize affordable and clean nuclear energy – helping families save money and meeting the demand driven by Ontario's rapid increase in population, new manufacturing facilities, advanced technologies like artificial intelligence data centers, the electrification of industry, and the charging energy required for electric vehicles.
- According to Ontario's Independent Electricity System Operator, the province's demand for electricity is forecast to increase by 75 per cent by 2050 – the equivalent of adding four and a half cities the size of Toronto to the grid. Prioritizing nuclear energy as the province's grid expands will help meet this significant demand.
- The nuclear industry forms the backbone of Ontario's energy mix. Nuclear power provides safe, reliable, clean, and low-cost electricity, which is essential to Ontario and Canada's balanced energy mix.
- Nuclear power is vital to ensuring Canada meets its commitment to achieve net-zero emissions by 2050 and OPG has concurrently committed to achieve net-zero carbon by 2040.

- OPG produces life-saving Cobalt-60 isotopes at the Darlington site, used in the sterilization of essential medical devices and cancer treatments.
- Through ongoing training, community involvement and emergency preparedness simulations, OPG continues to showcase their ability to respond in an unlikely scenario of an emergency, coordinated with local authorities and the Provincial Nuclear Emergency Response Plan.

Furthermore, driven by its unwavering focus on plant, people, and community safety, OPG's safety record is first-rate and among the highest in the North American nuclear industry. OPG's safety culture sets the highest standards for its supply chain, and partners such as Aecon are steadfast in their mutual commitment to putting safety first and it is evident that OPG is particularly dedicated to environmental protection and stakeholder engagement – two essential pillars for any sustainable infrastructure project.

Aecon believes OPG's operational leadership, regulatory compliance and social responsibility is world-class, and as our valued client, we are certain this will continue during both the application process and under the approval granted through the licence.

Considering the foregoing, as well as OPG's proven track record of operating safely and planning, executing and delivering complex nuclear work on-schedule and on-budget, Aecon firmly supports OPG's application for the Renewal of the Darlington Nuclear Generating Station Power Reactor Operating Licence.

Sincerely,



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