



CMD 25-H2.9

Date: 2025-04-28

**Written Submission from
BWXT Canada Ltd.**

**Mémoire de
BWXT Canada Ltd.**

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



April 28, 2025

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater Street
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Ottawa, Ontario
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Subject: CNSC public hearing on Ontario Power Generation's application to renew power reactor operating licence for the Darlington Nuclear Generating Station – Ref. 2025-H-02

Dear President and Commission Members,

BWXT Canada Ltd. (BWXT) appreciates the opportunity to provide written feedback to the Canadian Nuclear Safety Commission (CNSC) on Ontario Power Generation's (OPG) application to renew their power reactor operating licence for the Darlington Nuclear Generating Station (NGS) in advance of the public hearing scheduled for June 10, 2025.

As a leading participant in Canada's nuclear industry and a trusted supplier of critical nuclear components, equipment and services, BWXT has had the privilege of working closely with OPG across multiple projects. Our professional relationship over more than 50 years has afforded us first-hand insight into OPG's unwavering commitment to nuclear safety and operational excellence across all levels of its workforce. We can attest to their exceptional standards of nuclear safety culture, diligence in regulatory compliance, qualification of personnel and processes, and demonstrated commitment to project delivery excellence.

Having supplied more than 300 CANDU and Pressurized Water Reactor steam generators worldwide - in addition to other major plant components, equipment and fuel - BWXT has extensive experience developing innovative solutions for all areas of plant operations, from the nuclear reactor itself to conventional systems, reactor and fuel channel components, pressurizers, primary piping, critical heat exchangers, fuel handling systems, high-level waste and spent fuel storage. Our core business is maintaining the supply of nuclear fuel, components, services, engineering, equipment and parts for the nuclear power industry, as well as producing nuclear medicines for life science companies, radio pharmacies, hospitals and researchers.

BWXT supports CNSC's renewal of OPG's licence to operate Darlington NGS as it remains a vital source of safe, reliable, and low-carbon electricity for Ontario, and OPG's ongoing commitment to safety excellence has been vital to the station's world-class track record. OPG's application for licence renewal highlights several examples of its ongoing demonstration of this commitment to safety excellence. This includes the station's consistency in receiving CNSC's highest safety rating reflecting

effective implementation of safety programs, adherence to regulatory requirements, radiation protection, and proactive measures to maintain and enhance safety standards.

Safety culture at OPG is something which has been widely acknowledged to inform decision-making and behaviour throughout the organization. This is supported by independent safety assessments, ongoing training, and management systems based on international best practices which are central parts of OPG's approach to a high-performance safety culture. As a partner organization, BWXT can attest to OPG's openness in engaging stakeholders, including vendors and community members, in meaningful dialogue around safety practices and facility performance. Darlington NGS is widely regarded as one of the best-performing nuclear facilities in North America, consistently achieving high ratings from CNSC and international nuclear oversight bodies for its operational safety and reliability.

The station's outstanding safety record is reflected in key performance indicators, including minimal unplanned shutdowns, low radiation exposure to workers, and a strong record of environmental stewardship. Moreover, Darlington's recent refurbishment project—one of the most complex and ambitious in Canadian nuclear history—was executed with a focus on worker safety, quality assurance and strict regulatory adherence. Throughout this multi-year effort, OPG upheld world-class safety standards, completing work on time and on budget while ensuring the continued protection of people and the environment.

BWXT has observed first-hand how OPG continues to implement and maintain effective environmental protection and safety measures that meet regulatory requirements and effectively protect the environment and the health and safety of its employees. We would concur with CNSC staff that OPG is qualified to carry on the activity authorized by the licence and their conclusions that OPG, in carrying out those activities, will make adequate provision for the protection of the environment and human health.

We would similarly submit, based on our own extensive experience, that the CNSC's regulatory processes are among the most rigorous in the world, ensuring robust oversight of nuclear energy and materials to safeguard the health, safety, and security of Canadians, as well as the protection of the environment. We are also confident that OPG has the full range of competencies required to continue operating Darlington NGS well into the future. OPG is a proven leader in the generation of safe, clean and reliable electricity, and Darlington NGS is critical infrastructure required to power Canada's largest economy.

It is for these reasons, and the evidence presented to the CNSC in OPG's application, that BWXT endorses OPG's ability to continue to operate this important facility.

Sincerely,



John MacQuarrie
President