



CMD 26-H107.2

Date: 2026-06-25

**Written Submission from
Conexus Nuclear Inc.**

**Mémoire de
Conexus Nuclear Inc.**

In the matter of

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Application to change the integrated
implementation plan for Darlington
Nuclear Generating Station

Demande visant à modifier le plan intégré
de mise en œuvre pour la centrale
nucléaire de Darlington

**Hearing in writing based on written
submissions**

**Audience par écrit fondée sur des
mémoires**

August 2026

Août 2026



June 25, 2026

Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046
Ottawa, ON K1P 5S9
Email: interventions@cnsccsn.gc.ca

Subject: Letter of Support for Ontario Power Generation's Application to Revise the Integrated Implementation Plan (IIP) for Darlington NGS

Conexus Nuclear Inc. (Conexus) formally supports Ontario Power Generation's (OPG) application to modify the Integrated Implementation Plan (IIP) for the Darlington Nuclear Generating Station (NGS). Specifically, we endorse OPG's request to extend timelines for the aquatic thermal study and the aquatic impingement and entrainment study to align with the completion of the Darlington Refurbishment Project, and to add a new task to the IIP to align it with the existing Darlington NGS Fisheries Act Authorization (FAA) commitment.

Our support is grounded in the fact that OPG's proposed approach reflects the collective continuous improvement of the CANDU Industry. Conexus aims to enhance nuclear safety and environmental performance through thorough peer review and collaborative Research and Development (R&D). The FAA commitment includes a Best Available Technology Economically Achievable (BATEA) study that will further support the above objective by assessing whether improvements to existing technologies or systems are warranted.

The proposed changes represent a commitment to rigour and excellence:

- **Expanded Scope:** The BATEA study is being incorporated into the IIP to align commitments.
- **Extended Timelines:** The timelines have been extended to align with the completion of the Darlington Refurbishment Project, which is a prerequisite for initiating these studies. The revised timelines provide sufficient time to complete the studies following refurbishment activities.

OPG, a founding member of Conexus (formerly the CANDU Owners Group), brings decades of operational excellence to this project. Darlington NGS has a long-standing history of strong safety practices and exceptional operational performance, along with a proven track record in project management. With the expertise and dedication of qualified partners and vendors, Darlington NGS has demonstrated world-class project performance through the successful and safe refurbishment of its units. Their continued operation plays a key role in achieving Ontario's clean energy goals.

The foremost priority for our members is nuclear safety. The work conducted through Conexus has yielded significant results that showcase the dedication of the Canadian nuclear utilities to this objective, including:

Safety Analysis improvements:

- Aging Management Assessments
- Probabilistic and Deterministic Safety Assessments
- Severe Accident studies and management
- Analysis of external hazards
- Modifications to the stations and procedures to enhance safety

Numerous projects/work programs to ensure ongoing safe, long-term operation, including:

- Fuel Channel Life Management
- Research into pressure tube behaviour and longevity
- Optimization of plant processes through innovation and artificial intelligence
- Plant modernization
- Waste management and minimization
- Health Safety & Environment
- Environmental Regulations and Climate Change

Further, through Conexus' network of peer teams, staff from nuclear utilities collaborate to improve plant safety and operations. They focus on key areas, including Nuclear Safety, Environmental Affairs, Human Performance, Equipment Reliability, and Radiation Protection, and forums such as the Regulatory Affairs Vice Presidents Forum, where improvements to an already robust and mature regulatory framework are discussed. By sharing experiences and developing common strategies, Conexus members support one another and assist emerging nuclear utilities. In addition, Conexus has established a leadership and knowledge management training program to improve leadership and management skills among high-potential technical managers in the nuclear industry.

OPG plays a significant role by offering its expertise and sharing experiences with others. It contributes to and leads in all program areas and has collaborated with CANDU operators worldwide for over 40 years.

OPG and all Conexus members are committed to continuously enhancing safety, reliability, affordability, and environmental performance in Canada's nuclear plants. Incorporating the BATEA study into the IIP provides a clear, structured framework for completing the required work and aligning with the FAA commitment.

Finally, the proposed timeline extension is suitable, as it will ensure the studies are conducted at the appropriate time following the completion of the refurbishment activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachna Clavero". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rachna Clavero
President and CEO
Conexus Nuclear Inc.