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**Written submission from
E.S. Fox Limited**

**Mémoire de
E.S. Fox Limited**

In the Matter of the

À l'égard de

Darlington New Nuclear Project

**Projet de nouvelle centrale nucléaire de
Darlington**

Application to renew the nuclear power
reactor site preparation licence for the
Darlington New Nuclear Project

Demande de renouvellement du permis de
préparation de l'emplacement d'une centrale
nucléaire pour le projet de nouvelle centrale
nucléaire de Darlington

Commission Public Hearing

Audience publique de la Commission

June 10, 2021

10 juin 2021



April 29, 2021

Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa ON K1P 5S9

ATT: Louise Levert, Secretariat

Subject: Renewal of Nuclear Power Reactor Site Preparation Licence for OPG New Nuclear at Darlington Generating Station

Dear Commission members,

E.S. Fox Limited (ESFL) endorses Ontario Power Generation's (OPG) application to renew its current Nuclear Power Reactor Site Preparation Licence (PRSL), supporting the Darlington New Nuclear Project (DNNP). Allowing the extension of this PRSL will directly contribute to Canada's economy, environment and to the stability of low-cost, reliable energy to the residents of Ontario.

We understand that OPG is requesting to renew the Licence with no increase in scope from the existing licence granted by the CNSC. As OPG has not selected a technology at this time, it is not currently seeking approval for construction. We believe that OPG will ensure the selected new nuclear reactor technology is within the bounds of the licensing basis for the DNNP PRSL, with detailed demonstration during the subsequent licensing process for the Construction phase of the DNNP.

In support of OPG's original "Application for a Licence to Prepare Site," OPG undertook extensive studies, assessments and consultations with Indigenous communities and stakeholders to complete the site evaluation studies and develop OPG's Environmental Impact Statement (EIS), for the DNNP EA. The site evaluation studies concluded that the DNNP site is suitable for a new nuclear plant. The EA was completed and concluded that the project is not likely to cause any significant adverse effects, provided the mitigation measures proposed and the commitments made by OPG are implemented. The JRP, consisting of representatives from the CNSC and Canadian Environmental Assessment Agency, accepted the DNNP EA.

The DNNP allows for additional power generation capacity at the Darlington Nuclear Generation Station (DNGS). This is critical as the global nuclear industry advances its nuclear power generation technologies, as Ontario's population grows and as Canada moves towards becoming a Net-Zero country by 2050.

E.S. Fox History with OPG Nuclear Operations

ESFL has provided Engineering, Procurement and Construction (EPC) project services, along with manufacturing and fabrication support to OPG for decades. The rich history between OPG and ESFL has provided many opportunities to learn over the millions of safe work hours provided. Today, as OPG prepares for the build of Canada's first Small Modular Reactor (SMR) as part of the DNNP, we are proud to stand by OPG and provide our support.

It is through witnessing OPG's consistency in delivering safe and reliable nuclear power to Ontario since 1971 that we are confident in endorsing the renewal of OPG's PRSL for New Nuclear at Darlington site

Safety

OPG and E.S. Fox share a commitment to a "Safety First" work environment. Our corporate management goal and the goal of our employees is to ensure that everyone returns home safely at the end of each workday. Following OPG's lead, ESFL continues to refine our processes and practices to ensure a strong nuclear safety culture on all sites.

OPG is currently executing the refurbishment of DNGS's four reactors, one of the largest infrastructure projects in Canada. The refurbishment of DNGS Unit 2 was successfully completed in June 2020 with a strong safety record. Refurbishment of the second reactor (Unit 3) is currently underway.

The safety of the public and staff is OPG's top priority. OPG's Nuclear Power Generating Sites have been maintained and safely operated for 50 years. OPG has been recognized for a long history of safe operations of its nuclear facilities as well as being leaders in protecting the public, its employees, and the environment. The commitment to improve the plant through continual investment has resulted in year-over-year improvement in all key areas. The plant's performance, as well as OPG's commitment to safety, has allowed for open and respectful relationships within the communities they operate in.

Community Support

OPG supports the local community. OPG's community partnerships include Scientists in School, Toronto & Region Conservation Authority, Rouge Valley Health System Foundation (Ajax & Pickering Site), and the Oshawa & Durham Region Métis Council's Heritage Celebration.

OPG is a member of the Canadian Council for Aboriginal Business (CCAB), championing the need for more Indigenous representation in businesses through employment and partnership opportunities. OPG's Indigenous Opportunities Network (ION) is a community-centred program that recruits Indigenous people for skilled trades, project management and administrative jobs within the energy sector. ESFL is a proud member of ION and continues to partner with OPG on its inclusion efforts.

Furthermore, OPG's Corporate Citizenship Program provides community investment support to over 90 Indigenous initiatives including: reading and science camps, traditional culture and language initiatives, and youth amateur sports.

The opening of the Canadian Center for Nuclear Sustainability (CCNS) further demonstrates OPG's commitment to the communities they serve. As ESFL is an Industry Catalyst at the CCNS, we see OPG's efforts of:

- leveraging and coordinating Ontario's vast talents and competencies to make Canada a world leader in nuclear decommissioning;
- advancing innovative solutions for nuclear materials, with a continuing emphasis on minimizing the environmental footprint by reducing volumes, and diverting and recycling clean materials;
- stimulating economic growth in Ontario using cross collaboration between organizations that will lead to the launch of projects and research and development opportunities; and
- collaborating and forming partnerships with the nuclear industry, community, local businesses, academia and Indigenous communities, as well as interprovincial and international organizations to discover research, development and export opportunities for innovative nuclear energy solutions.

Environmental Benefits

OPG has taken the lead to support both Canada and Ontario's Net-Zero emissions by 2050 commitment. Since Ontario became the first North American government to eliminate coal-fired electricity generation, OPG has been a key contributor towards Canada's Environmental Net-Zero emission goals. Nuclear power is a key contributor to Ontario's low-emitting electricity grid, and is considered by many experts, including the International Energy Agency, to be critical to achieving net-zero economy by 2050. OPG as a company is committed to operating as a Net-Zero company by 2040.

Since 2012, OPG has been maintaining the PRSL and progressing long-lead regulatory commitments. OPG was recognized for its commitment to protecting the wildlife that surrounds its sites.

- OPG Darlington received the 2019 Sustainability Award from the Greater Oshawa Chamber of Commerce.
- In 2020, OPG Darlington received a gold Wildlife Habitat Council Conservation Certification recognizing the specific efforts of DNGS's biodiversity program.

Economic benefits

The Darlington Nuclear Generating Station (DNGS) refurbishment project, commenced in 2016 and expected to be completed in 2026, will add 30 years to its nuclear operations. This project is estimated to generate a total of \$89.9 billion in economic benefits for Ontario, create and maintain 14,200 well-paying jobs – boosting personal income by an average of \$1.6 billion on an annual basis. This will also benefit Ontario residents with reliable, low-cost power. ESFL has the privilege to supply EPC project services to the DNGS refurbishment project as an Extended Services Master Services Agreement contracted supplier and partner.

As planning continues for the DNNP, the economic benefits include direct and indirect employment (including STEM and other high-tech disciplines and skilled trades), economic growth through

partnerships with Canadian Nuclear Services suppliers and manufacturers, along with the purchase of services and products through the Canadian nuclear supply chain.

Summary

To support its application, OPG prepared and submitted detailed Licence Renewal Activity Reports (LRARs) (also publicly available on OPG.com) and a Site Selection Threat and Risk Assessment, to further support the 10-year licence renewal application. The findings documented in the LRARs were reviewed and documented in the Aggregate Assessment Report. OPG has demonstrated through the Aggregate Assessment Report that the existing licensing basis remains valid for the next licensing period with the mitigating actions which have been added to the DNNP Commitments Report.

Given the contributions OPG Darlington has made to Canada's economy, environment and local communities since 2012, an extension of OPG Darlington's Site Preparation Licence will enable increased operations, directly benefiting Canada. ESFL has been privileged to be a partner in OPG Darlington's growth over the years and we are looking forward to the promising future of the DNNP. We hold a great confidence in OPG's ability to maintain the upmost health and safety standards for its employees, partners and the communities they serve.

Sincerely,



Terry Armstrong, VP, Nuclear
E.S. Fox Limited