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**Written submission from
PCL Industrial Constructors Inc.**

**Mémoire de
PCL Industrial Constructors Inc.**

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



CONSTRUCTION

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April 29, 2021



Canadian Nuclear Safety Commission
Tribunal Officer, Secretariat
280 Slater St. PO Box 1046
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PCL's Intervention for the Proposed Licence to Prepare Site for the Darlington New Nuclear Project

PCL is Canada's largest constructor that carries out work across Canada, the United States, the Caribbean and Australia. We have diverse operations in civil infrastructure, heavy industrial and the buildings markets that are supported by 31 major centers. Together, we have an annual construction volume of more than \$8 billion, making PCL one of the largest contracting companies in North America. We are a Canadian company that is 100% employee owned, with 4600 employees that manage approximately 20,000 trades people. We have offices in almost all our provinces, with our corporate head office in Edmonton, Alberta along with the largest modular facility in Canada, if not North America. PCL is committed to building up our nuclear energy footprint and operations in Canada, and we are supportive of the proposed project for a new nuclear power reactor at Darlington Nuclear Generating Station.

Nuclear energy is a safe, clean, reliable and affordable source of energy. Canada has a great uranium resource combined with one of the most well-developed nuclear supply chains, demonstrated by the recent MOU signed by the provinces of New Brunswick, Saskatchewan and Ontario to collaborate on SMR development. Alberta has more recently decided to participate which is an incredible milestone in our Canadian nuclear industry. Saskatchewan has the potential to become an international nuclear fuel manufacturer and supplier for TRISO fuel which many of the SMR designs will utilize. If we continue to act with priority, as with the licensing of the Darlington site, there is an opportunity to capture the economic benefits that will arise for Canadians from coast to coast and the potential to make Canada a global leader in nuclear energy. We hope that the CNSC and Canadians can see how the continued development of this industry will touch every province and territory across our great nation.

PCL understands that Ontario Power Generation's Darlington Site is subject to a hearing for the renewal of its nuclear power reactor site preparation license with the CNSC as the sole responsible authority. In addition, the Environmental Assessment has been accepted by the CNSC in support of the initial application and no other activities of significance have occurred to challenge its validity. After reviewing the submitted documents, PCL agrees with the continued pursuit of preparation activities for developing a grid size Small Modular Reactor that will provide safe, clean, reliable and economic power to the public.

The purpose of the project at Darlington is to undertake the development of the next generation nuclear reactors to provide safe, reliable energy while also reducing Canada's carbon footprint and achieving

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climate change goals. A successful project will prove that nuclear energy, specifically, small modular reactors, are a viable alternate energy solution for Canada and worldwide.

PCL has reviewed OPG's submitted documents, in particular CMD 21-H4.1, that summarizes and updates the information supporting the DNNP license renewal application and would like to offer the following comments for the Commission's consideration:

- The proposed site at Darlington has been part of the development of the nuclear program for decades by safely operating Darlington Units 1 to 4, a Tritium Removal Facility, a Dry Fuel Storage Facility and all of the associated Safeguards systems. During its history of operation, the management of the site has ensured the continued safety of the public, employees and the environment. This has been demonstrated by achieving the highest WANO rating that is exemplary of operational excellence. We expect that this focus on safe operation will continue to apply to the current proposed plant under the existing management framework that has served them well.
- The land is well characterized and understood from a technical and cultural perspective. Therefore, there is a low probability that there will be impacts on any physical or cultural heritage aspects that have not already been well studied and documented.
- The Darlington New Nuclear project ensures reliable baseload nuclear power generation, remains an important part of Ontario's low-carbon energy mix, complementing the use of renewable energy sources which can be intermittent in their ability to supply energy. This project is especially important with the pending shutdown of Pickering and loss of a significant baseload generation and nuclear skilled workers.
- The construction for a Small Modular Reactor will substantially take place off site based on its modular design. This increases the safety and quality of the plant, as only the assembly of major components takes place on site. This construction technique minimizes the on-site construction period with less construction traffic and site congestion, therefore reducing the environmental impact and local traffic congestion.
- In the absence of this project to replace the baseload generation, another fossil based technology will replace the lost Pickering Generation, circumventing Canada's progress towards meeting our climate targets for Greenhouse Gas Emissions.

Let me close by reiterating PCL's commitment to the goals of clean energy, environmental protection, resource development, and economic growth. Goals we believe OPG will demonstrate and achieve through the execution of this project. There will be no benefit derived by delaying the application that is before the CNSC for the renewal of the License to Prepare Site.

In conclusion, PCL supports the CNSC approval of the license renewal.



Sincerely,

A handwritten signature in black ink, appearing to read 'Louie Shoukas', written over a horizontal line.

Louie Shoukas
Chief Nuclear Officer
PCL Industrial Constructors Inc.