



Supplementary Information

Renseignements supplémentaires

Presentation from the Society of United Professionals

Présentation de la Society of United Professionals

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 10-11, 2021

10-11 juin 2021



SOCIETY *of*
UNITED PROFESSIONALS
IFPTE 160

PRESENTATION TO THE CANADIAN NUCLEAR SAFETY COMMISSION

FOR ONTARIO POWER GENERATION INC., DARLINGTON NEW
NUCLEAR PROJECT – LICENSE TO RENEW THE PRSL

Presented by: Michelle Johnston, President
Dr. Ralph Chatoor

THE SOCIETY OF UNITED PROFESSIONALS

- Member driven organization representing 8,700 members
- Employed in the energy and legal sectors
- Expertise in Nuclear Sector - Darlington & Pickering NGS
- Members currently working on the Darlington New Nuclear Project

PRESENTATION OVERVIEW

- Opening Remarks
 - The Society of United Professionals
 - Presentation Overview
- We will be commenting in the areas of:
 - Choice of Technology
 - Indigenous Consultation
 - Environmental Risks
 - Nuclear & Conventional Safety
 - Public Safety / Nuclear Security
 - Radiation Protection & Emergency Preparedness
 - Equity, Diversity and Inclusion
- Conclusion
- Request

CHOICE OF TECHNOLOGY

- OPGs Commission Member Document did not identify a nuclear technology for this project
- The project allows for a reliable, low cost and low-carbon source of energy that fits within the Government of Canada's goal to reach net-zero emissions by 2050
- Without having increased the scope of the project it is understood that the licensee is not required to choose a technology
- It is expected in its application for a license to construct, there would be a detailed analysis of the project addressing Safety and Control Areas and matters of Regulatory Interests

INDIGENOUS CONSULTATION

- In its mid-term report the Society notes that important relationships have been fostered with Indigenous groups including those with the Williams Treaties First Nations, the Mohawks of the Bay of Quinte and the Métis Nation of Ontario Region 8
- Ongoing consultation and engagement efforts with First Nations groups have been coupled with a heritage assessment being conducted to identify Indigenous and Euro-Canadian heritage artefacts on DNNP lands and preserving such precious artefacts at the Ontario Sustainable Archaeological Repository

ENVIRONMENTAL RISKS

- Species at risk have been identified on the project development site including Bank Swallows and Butternut tree
- OPG has committed to the protection of these two species
- Commitments dealing with protection of Bank Swallows and Butternut Tree are captured under commitments D-P-3.8 and D-P-3.7
- Licensee has committed to establishing an Environmental Management and Protection Plan and operationalized in the License Condition Handbook putting in place Environmental Monitoring Systems to report on impacts on the natural environment

NUCLEAR & CONVENTIONAL SAFETY

- Licensee is committed to conducting a detailed safety analysis of the selected reactor technology to ensure that the safety case, including a nuclear safety and probabilistic safety analysis which ensures that the project falls within the 'licensing basis'
- It is understood that OPG is required to develop and submit an Occupational Health and Safety Plan specific to site preparation activities prior to the start of licensed activities addressed by Commitment D-P-2.1

PUBLIC SAFETY / NUCLEAR SECURITY

- Safe nuclear operations in the province for the past 50 years, our members have significantly contributed to public trust via developing programs and processes which protect employees, protect the environment and keep the public safe
- Site Security Plan outlines the implementation of specific provisions regarding site access and physical security
- Guarding against Cyber-security incursions is a focus area for OPG who is working programmatically towards addressing this. OPG's cyber security program meets the security requirements of REGDOC-1.1.1

RADIATION PROTECTION & EMERGENCY PREPAREDNESS

- Verification that workers preparing the site are not receiving doses in excess of limits for non-Nuclear Energy Workers dose from operation of Darlington Nuclear Generating Station and the Darlington Waste Management Facility via OPGs Occupational Health & Safety plan
- REGDOC-2.10.1, Nuclear Emergency Preparedness and Response, provides requirements regarding the planning basis for an emergency preparedness program. OPG's Emergency Preparedness Program N-PROG-RA-0001 concluded that there were no gaps. The emergency planning governance will be augured once a reactor design has been selected

EQUITY, DIVERSITY AND INCLUSION

- The Equity, Diversity and Inclusion (ED&I) program is an imperative for OPG
- The Society is informed that through its supply chain procurement process vendors are required to place emphasis on ED&I
- Given that it is OPGs plan to procure the services of an external vendor to prepare the site, the Society expects that ED&I would be a facet when considering vendors of final selection

CONCLUSION

- The Society is satisfied that license condition 15.1 and 15.2 ensures that all mitigation measures proposed and commitments made by OPG through the JRP review process are fulfilled, including the EA follow-up program
- Commitments will be tracked and reported through the annual Regulatory Oversight Report for Canadian Nuclear Power Generating Sites and through the Midterm Report
- Society supports OPGs application to renew the PRSL under Section 24 of the Nuclear Safety and Control Act as adequate mitigation measures have been put in place

REQUEST

That the licensee meet with the Society on a quarterly basis to discuss developments of the project with regard to:

- (i) the choice of nuclear technology; and
- (ii) the progress of the commitments noted in our submission.

THE SOCIETY OF UNITED PROFESSIONALS THANKS
THE CNSC FOR THE OPPORTUNITY TO COMMENT



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