



**Written submission from the
Ontario Nuclear New Build Council**

**Mémoire du
Ontario Nuclear New Build Council**

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

Sent by Email on May 3, 2021

On behalf of the Ontario Nuclear New Build Council, we would offer the following comments:

Key Messages:

- OPG has renewed planning for potential new nuclear power development at the DNNP site. Nuclear power generation provides safe, reliable baseload low-carbon electricity generation. 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 by 2050. The Canadian federal government considers nuclear essential to net-zero for Canada.
- OPG has included new nuclear generation and Small Modular Reactors in its Climate Change Plan issued in late 2020. One of OPG's first priorities is to renew the existing Site Preparation Licence, the only one in Canada. Using the Darlington site for new nuclear will enable the next generation of grid-scale nuclear power plants in Canada faster than at any other location, enabling faster deployment of this tool in fighting the climate change crisis.
- In the application, OPG is requesting to renew the Licence "as is". There is no requested increase in scope from the existing licence granted by the CNSC. OPG has not selected a technology at this time and is not currently seeking approval for construction. 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 DNNP.
- Since 2012, OPG has been maintaining the PRSL and progressing long-lead regulatory commitments related to the licence and our EA, such as bank swallow mitigating measures. OPG has submitted annual reports to the CNSC and a midterm licence report in 2018. These reports provided the status and progress of the DNNP activities and the status of the commitments that OPG made in the DNNP EA, during the Joint Review Panel (JRP) hearing and as outlined in the JRP recommendations, which were accepted by the Government of Canada and documented in the "Darlington New Nuclear Project Commitments Report". OPG has shown that we are progressing on these commitments and their completion is on track per the requirements of the commitments report.
- 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 CNSC requires the site evaluation information to assess the licence application for the facility's lifecycle as part of the Application for a licence to prepare site. In support of the PRSL renewal, OPG completed a review of the DNNP site evaluation in accordance with its DNNP PRSL Renewal Plan which addressed the following:

1. Regulatory Document REGDOC-1.1.1, Site Evaluation and Site Preparation for New Reactor Facilities, requirements and guidance which included:

- - a. Review of Original Application materials against REGDOC-1.1.1 requirements and guidance and addressing of identified gaps. REGDOC-1.1.1 superseded the previous RD-346 and expanded the scope to include small reactor facilities using a graded approach along with introducing new requirements.

- b. Review of current codes, standards and practices referenced in the licensing basis and those associated with CNSC REGDOC-1.1.1.
- c. Update and review of selected baseline data associated with the site.

2. Indigenous engagement on PRSL renewal.

3. Public engagement on PRSL renewal.

4. Review of the management system that governs site preparation activities.

- To support its application, OPG prepared and submitted details 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 (along with the results from items 1 and 4 above) were reviewed and documented in the Aggregate Assessment Report. OPG has demonstrated through the Aggregate Assessment Report (see OPG.com) 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.

- With respect to items 2 and 3, OPG conducted a clause-by-clause review of REGDOC-3.2.1, "Public Information and Disclosure" and REGDOC-3.2.2, "Indigenous Engagement" to ensure compliance of OPG's relevant management system documents with these regulatory documents. Relevant documentation and governance has been updated to remove one minor gap with respect to the Public Information and Disclosure standard. No gaps were identified with respect to OPG's Indigenous Relations Policy as it related to REGDOC-3.2.2.

Conclusion:

The DNNP site evaluation and licence application has been reviewed against applicable regulatory requirements, current codes, standards and practices as well as current site baseline data. While changes have been identified and assessed, their resulting impacts are not significant and do not alter the previous conclusion on the suitability of the DNNP site for a new NGS. As such, the DNNP site remains suitable for a new nuclear generation and OPG's site preparation licenced activities would not pose any unreasonable risk to the public, personnel or environment.

John Mutton,

Chairman

Ontario Nuclear New Build Council