



Supplementary Information

Renseignements supplémentaires

Presentation from Northwatch

Présentation de Northwatch

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

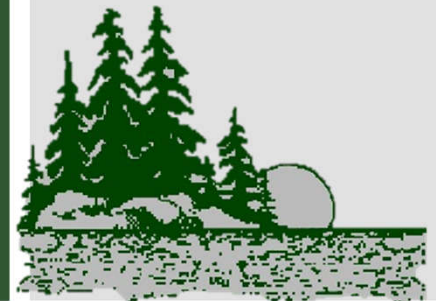
10-11 juin 2021

Ontario Power Generation's Application for the renewal of its Waste Facility Operating Licence for the Pickering Waste Management Facility (PWMF)

Ref. 2021-H4.43

Northwatch

June 2021 Presentation to the Canadian Nuclear Safety Commission





OPG's Application to Renew the DNN Site Preparation License

“OPG has not selected a technology developer partner, or reactor design, for DNNP at this time. OPG will ensure the selected reactor technology is within the bounds of the licensing basis for the DNNP PRSL, with detailed demonstration of this to be addressed during the subsequent licensing process for the Construction phase of DNNP. For planning purposes, OPG envisions the new nuclear facility at DNNP will be in operation by 2028, as described in the DNNP PRSL Renewal Plan [R-3]. An indicative schedule for DNNP, as illustrated in Figure 5, shows approximate timelines for licensed activities associated with this Application.

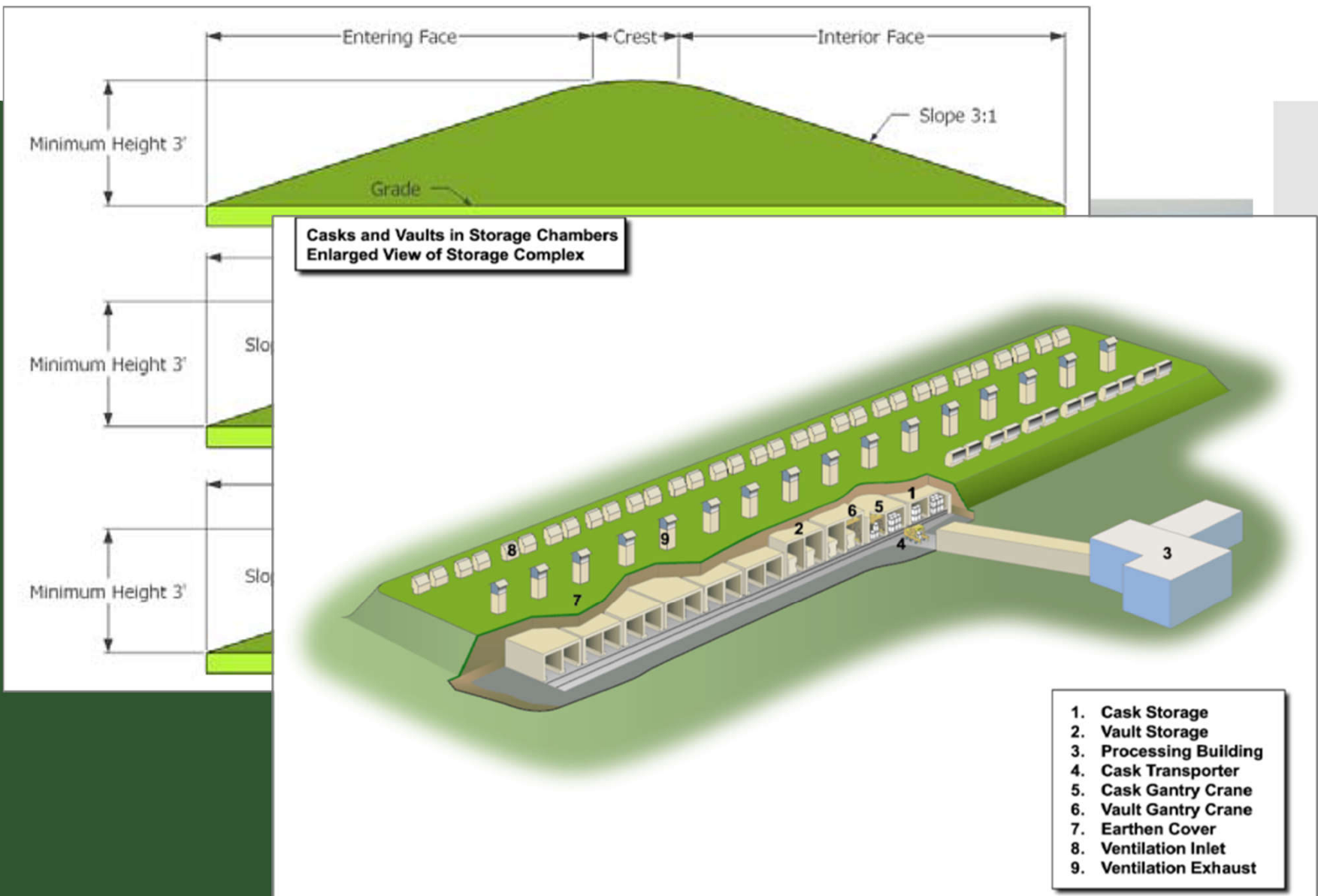
The above timeline is subject to a decision by OPG and its shareholder, the Province of Ontario, to decide to progress to a formal Project to construct a new nuclear facility, as well as all necessary licensing and regulatory approvals.”

REQUEST: The Commission require OPG to provide a complete project description following selection of their preferred reactor design prior to re-filing their application to renew the site preparation licence, to provide the Commission with an information base to consider whether the previous EA was for the same project as which OPG is not proposing to undertake.

Lack of Information Regarding Site Layout

- Application should contain at least the same information as the 2009 application
- Information must be 'contained in' the application and be made publicly available
- Information regarding the site layout that must be 'contained in' the application
 - Deficiencies noted are related to and/or include:
 - Site layout requirements in REGDOC 1.1.1 (no proposed layout provided)
 - SPL Section 2.0 – General Description of the Project (overly generic information)
 - SPL Section 2.1 – Excavation and Grading (no evaluation of soil for contamination to date)
 - SPL Section 2.1 – Flood Control and Shoreline Protection (site layout should be done in advance of decision around lake infill)
 - SPL Section 3.1 – Location and Site Layout (application information illegible, insufficient)
 - SPL Section 4.1 – Site Evaluation (identified hazards and site mitigation not included)
 - SPL Section 4.3 – Plant Parameter Envelope (PPE values not included; technology and design not identified)
 - SPL Section 4.7.1 – Evaluation against the CNSC Safety Goals (at minimum should summarize spatial requirements of different designs under consideration)
 - SPL Section 5.5.3 – Layout of Areas, Structures, and Systems (insufficient information about actual layout of site)

REQUEST: The Commission direct OPG to address all of the above noted shortcoming in its re-filed Application for a License to Prepare the Site



Reducing Risk: Making Storage More Robust

Licence Period

The driver behind the early application for renewal is a business interest, rather than a safety interest:

OPG is applying for a 10-year licence renewal with a licence term starting from August 2021. This renewal would allow for the project to advance in accordance with OPG's current business planning assumptions for new generation capacity. This approach will mitigate the risk of the PRSL expiring and preserve, for both OPG and our shareholder, the Province of Ontario, maximum flexibility for future nuclear generation at Darlington. The PRSL continues to be a significant asset for OPG and the Province of Ontario, as it enables the option for future additional nuclear generation capacity in Ontario, which would maintain a reliable source of baseload nuclear power within Ontario's energy supply mix.

REQUEST: The Commission directs OPG to re-make their application after they have selected their preferred technology and are in a position to provide an adequate project description

Qualified Operator

Before issuing a licence, the CNCS must conclude that, further to paragraphs 24(2), (4)(a) and (b) of the NSCA, the licensee is qualified to carry on the activity authorized by the licence.

As of the time of the application, OPG had not yet initiated any licensed activities, had not selected a reactor technology for future generation and no Engineering, Procurement and Construction (EPC) Company had been contracted

“OPG is planning to have a project oversight organization, thus ensuring the licences and approvals are achieved and the overall contract completed once the EPC Company is established. The organizational structure will continue to evolve as project activities increase and the EPC Company for the project is established.”

REQUEST:
CNCS direct OPG to include in their initial Project Description a clear and detailed explanation of any arrangements between OPG and any other parties...

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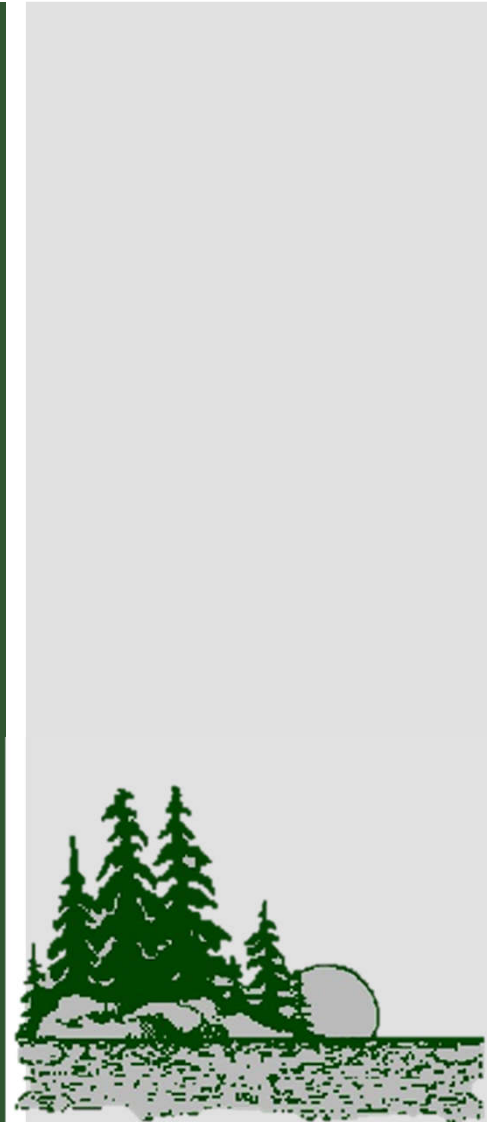
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REQUEST: that the Commission ensure that any future determinations of whether the licensee is qualified to carry on the activity authorized by the licence be done with a detailed description by any future licensee of any owner / operator / contractor arrangements that might be in place.

Conclusions

In conclusion, Northwatch draws three main findings from our review:

1. The application is premature,
2. The information provided is inadequate
3. The Commission must make a determination as to whether the Project of 2022 is the same Project as the one that was the subject of an EA and licencing decision in 2012



REQUESTS

- REQUEST: The Commission require OPG to provide a complete project description following selection of their preferred reactor design prior to re-filing their application to renew the site preparation licence, to provide the Commission with an information base to consider whether the previous EA was for the same project as which OPG is not proposing to undertake.
- REQUEST: The Commission direct OPG to address all of the above noted shortcoming in its re-filed Application for a License to Prepare the Site
- REQUEST: The Commission direct OPG that, should they decide to return in 2022 they do so only with a complete application, that application should include details on site configuration that accommodates waste storage and reflects reactor selection.
- REQUEST: The Commission directs OPG to re-make their application after they have selected their preferred technology and are in a position to provide an adequate project description
- REQUEST: CNSC direct OPG to include in their initial Project Description a clear and detailed explanation of any arrangements between OPG and any other parties, including the vendor, that might include contracting out operation of any eventual reactor(s) or any other deviations from an owner/operator status for OPG with respect to new reactors at the Darlington site.
- REQUEST: that the Commission ensure than any future determinations of whether the licensee is qualified to carry on the activity authorized by the licence be done with a detailed description by any future licensee of any owner / operator / contractor arrangements that might be in place