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**Oral presentation**

**Exposé oral**

**Written submission from  
Women in Nuclear Canada**

**Mémoire de  
Women in Nuclear Canada**

In the Matter of the

À l'égard de

**Darlington New Nuclear Project**

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**Projet de nouvelle centrale nucléaire de  
Darlington**

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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**



Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
280 Slater St. PO Box 1046  
Ottawa, Ontario K1P 5S9

April 28, 2021

**Subject: Public hearing for the Application for Renewal of OPG's Darlington New Nuclear Project (DNNP) Nuclear Power Reactor Site Preparation Licence (PRSL)**

Dear Sir or Madam,

Women in Nuclear (WiN) Canada is pleased to submit an intervention in support of the renewal of Ontario Power Generation Inc.'s nuclear power reactor site preparation licence for the Darlington New Nuclear Project under review by the Canadian Nuclear Safety Commission (CNSC).

Women in Nuclear (WiN) Canada was established in 2004 and has over 3,300 members across Canada. Almost all our members work in the nuclear industry and many live in the communities in which the nuclear industry operates. Safety and the environment are always an important consideration for our members. We want to ensure our working environment has the highest safety standards for its employees. We also place a high priority on the safety of communities in which we live and raise our families.

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.

OPG has renewed planning for potential new nuclear power development at the DNNP site. Nuclear power generation provides safe, reliable, low-carbon baseload electricity generation and is a key contributor to Ontario's low-emitting electricity grid. It 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. 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.

As women working in the nuclear industry, we value the role nuclear energy plays in a net-zero carbon future. The role of nuclear energy in Canada is critical to our success in reaching our net-zero carbon goals by 2050. Canada's nuclear industry makes an important contribution to reducing greenhouse gas (GHG) emissions. "Women are disproportionately affected by the impacts of climate change all over the world. Women's traditional roles as the primary users and managers of natural resources, primary caregivers, and keepers of the home mean they are involved in and depend on livelihoods and resources that are put most at risk by climate change" (Canada.ca, 2019). A clean-energy future is important to women everywhere. Approval of this licence based on the data submitted is important to a clean energy future in Canada.



In OPG’s application, 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 the EA. 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 they are progressing on these commitments and their completion is on track per the requirements of the commitments report.

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:

In support of this application, OPG updated its environmental baseline data to confirm that its site evaluation for the lifecycle of the facility remains valid as required by REGDOC-1.1.1, Site Evaluation and Site Preparation for New Reactor Facilities.

These activities and findings below:

<p><b>1. Regulatory Document REGDOC-1.1.1, Site Evaluation and Site Preparation for New Reactor Facilities, requirements and guidance which included:</b></p> <p><b>a. Review of Original Application materials against REGDOC-1.1.1 requirements and guidance and addressing of identified gaps.</b> 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.</p> <p><b>b. Review of current codes, standards and practices referenced in the licensing</b></p>	<p>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.</p> <p>The findings documented in the LRARs (along with the results specific to item 4) 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.</p>
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<p><b>basis</b> and those associated with CNSC REGDOC-1.1.1.</p> <p>c. <b>Update and review of selected baseline data associated with the site.</b></p>	
<p><b>2. Indigenous engagement on PRSL renewal.</b></p>	<p>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.</p> <p>No gaps were identified with respect to OPG's Indigenous Relations Policy as it related to REGDOC-3.2.2.</p>
<p><b>3. Public engagement on PRSL renewal.</b></p>	<p>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.</p> <p>Relevant documentation and governance has been updated to remove one minor gap with respect to the Public Information and Disclosure standard.</p>
<p><b>4. Review of the management system that governs site preparation activities.</b></p>	<p>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.</p> <p>The findings documented in the LRARs (along with the results specific to item 4) 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.</p>

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. In addition, the future opportunities for this site will provide Canada with a viable option for clean, reliable nuclear energy, complementing renewables, in meeting





growing energy demands, while supporting environmental and climate change goals. It is for these reasons that Women in Nuclear (WiN) Canada supports OPG's application for the renewal of Darlington New Nuclear Project (DNNP) Nuclear Power Reactor Site Preparation Licence (PRSL).

Respectfully,

*Laurie Fraser*

Laurie Fraser  
Director at Large  
Women in Nuclear Canada

A handwritten signature in black ink that reads "Judy Bartley". The signature is fluid and cursive, with the first name being more prominent.

Judy Bartley  
Chapter Chair  
Women in Nuclear Durham

