



**Written submission from the
Society of United Professionals**

**Mémoire de la
Society of United Professionals**

In the Matter of

À l'égard de

**Financial guarantee proposed by Ontario
Power Generation (OPG) for its Darlington
New Nuclear Project**

**Garantie financière proposée par Ontario
Power Generation (OPG) pour son projet de
nouvelle centrale nucléaire de Darlington**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

May 2022

Mai 2022



SOCIETY *of*
UNITED PROFESSIONALS
IFPTE 160

FINANCIAL GUARANTEE FOR ONTARIO POWER GENERATION
DARLINGTON NEW NUCLEAR PROJECT POWER REACTOR SITE
PREPARATION

SUBMITTED TO CANADIAN NUCLEAR SAFETY COMMISSION BY THE
SOCIETY OF UNITED PROFESSIONALS

APRIL 28, 2022



The Society of United Professionals appreciates the opportunity to comment on Ontario Power Generation's proposed Financial Guarantee in accordance with License Condition G.5 of its licence for the Darlington New Nuclear Project (PRSL 18.00/2031).

Background

The Society of United Professionals ("Society") represents more than 8,900 engineers, scientists, supervisors, lawyers and other professionals mostly concentrated in Ontario's energy and legal sectors. The Society has represented professional workers since 1944.

The Society represents employees who work for Ontario Power Generation, Hydro One, Bruce Power, Independent Electricity System Operator, Legal Aid Ontario, Toronto Hydro, Electrical Safety Authority, Technical Standards and Safety Authority, Ontario Energy Board, National Judicial Institute, and Chinese and Southeast Asian Legal Clinic.

Society members work in every aspect of the electricity industry. They are involved in generation, transmission and distribution of electricity, management of the electricity system and market, and regulation and enforcement of standards. They are employed as first-line managers and supervisors, professional engineers, scientists, information systems professionals, economists, auditors and accountants, as well as serving in many other professional, administrative, and associated occupations.

The Society's members are knowledge workers who take great pride in exercising their civic, social, and professional responsibilities. As a union, the Society stands behind our members' professionalism, integrity, and commitment to excellence in all areas, particularly workplace safety, public health, and environmental sustainability.

Society members' expertise was acknowledged in Ontario's 2017 Long Term Energy Plan wherein it was stated:

For more than four decades, Ontario's electricity sector labour unions have been key partners in Ontario's nuclear industry. Today, Power Workers' Union and Society of Energy Professionals [as the Society of United Professionals was known at the time] together represent more than 23,000 employees in Ontario's electricity system, including our nuclear plants and supply chain companies. OPG and Bruce Power will continue to rely on their skills and expertise to refurbish our nuclear fleet and ensure safe operation for decades to come.

Approach

As a union representing experts in the nuclear industry and as intervenors in previous hearings on the Darlington New Nuclear Project (including the Joint review panel (JRP): Darlington New Nuclear Power Plant (2011) and OPGs Application to renew the nuclear power reactor site preparation licence for the Darlington New Nuclear Project - CMD 21-H4.31A) in (2021)) the Society welcomes the opportunity to comment on the proposed Financial Guarantee.

The Society's comments contained in this intervention were based on OPGs obligation to provide adequate funds to decommission the activities authorized in licence PRSL 18.00/2031 should the project be cancelled during the site preparation stage. License activities include: construction of site access control measures; clearing and grubbing of vegetation; grading and leveling of the site; installation of services and utilities; construction of administrative and support buildings inside the



future protected area; construction of environmental monitoring and mitigation systems; and, construction of flood protection and erosion control measures.

Upon request, OPG provided the Society with its Darlington New Nuclear Project Site Preparation Preliminary Decommissioning Plan (NK054-PLAN-00960-00005-R000, Nov. 2021) (PDP) wherein it indicated that the safe-stated and decommissioned site would be capable of supporting non-licensed industrial use (for the benefit of the Darlington Nuclear Generating Station site or other OPG uses). The PDP establishes the basis from which the cost of safe-stating and decommissioning is calculated.

The Society's intervention in June 2021 (OPGs Application to renew the nuclear power reactor site preparation licence for the Darlington New Nuclear Project - CMD 21-H4.31A) highlighted areas of interest including those of Indigenous Consultation, Environmental Risks, Nuclear & Conventional Safety, Public Safety / Nuclear Security, Radiation Protection & Emergency Preparedness. These areas of interest were examined in the PDP with a view to identifying the adequacy of the proposed abatement measures.

The Society makes the following observations.

Observations

Environmental Risks

The Environmental Assessment for the licence to Prepare Site for Future Construction of OPG New Nuclear at Darlington found that the project was unlikely to have significant adverse effects provided that adequate mitigation measures were put in place. These measures to protect the environment and species at risk are being tracked by regulatory commitments. It is expected that OPGs Offset and Mitigation Plan would protect species at risk and wildlife inhabiting the site during the decommissioning phase.

Although chemical hazards may be present, these would be limited to the site preparation and upon decommissioning industrial fluids would be removed as the site is restored. Given that there are no nuclear substances used during site preparation no nuclear waste is expected to be generated. Efforts to reseed the decommissioned site will protect against the erosive effects of rain and wind.

Nuclear & Conventional Safety

The PDP considered potential hazards arising from industrial and construction activities, biological sources, motor vehicle accidents and inclement weather. These hazards will be eliminated or controlled using the Darlington New Nuclear Project Occupational Health and Safety Plan. Contractors performing engineering, procurement and construction (EPC) work for the purposes of safe-stating and decommissioning will be required to apply these standards.

Public Safety / Nuclear Security



Each of the major phases of the project requires adherence to the General Nuclear Safety and Control Regulations and Nuclear Security Regulations. Based on documentation submitted by the licensee plans are to secure the services of a contractor to decommission the site. During the course of performing decommissioning activities, an EPC contractor will be bound by these regulations. Ultimately, control of the site will be returned to OPG Security.

Radiation Protection & Emergency Preparedness

OPG stated that site preparation activities would take place outside the Protected Areas established for Darlington Nuclear Generating Station and the Darlington Waste Management Facility. As radioactive materials are not used during the site preparation phase radioactive waste will not be generated and in need of disposal. During the safe-stating and decommissioning activities, Emergency Management and Fire Protection Plan and the Darlington New Nuclear Project Nuclear Emergency Preparedness Plan will govern.

Cost Estimate

The estimated decommissioning costs for years 2022 and 2023 are zero dollars and \$451,000 for the 2024 Financial Guarantee year and will be secured by a Letter of Credit. The Society feels confident in deferring to the expertise of the CNSC staff who concluded in CMD: 22-H103 that this quantum of financial guarantee is sufficient. Moreover, CNSC staff confirms that the estimated costs are consistent with Regulatory Guide G-206 - Financial Guarantees for the Decommissioning of Licensed Activities.

Recommendation

Given the foregoing, the Society supports the Financial Guarantee submission proposed by OPG as our concerns cited in previous interventions on the DNNP were spoken to.

The Society has taken great interest in the Darlington New Nuclear Project and wishes to thank the CNSC for the opportunity to comment.

All of which is respectfully submitted,

Michelle Johnston

President, Society of United Professionals