



CMD 25-H2.40

Date: 2025-05-07

**Written Submission from
E.S Fox Limited**

**Mémoire de
E.S Fox Limited**

In the matter of the

À l'égard d'

Ontario Power Generation Inc.

Application to renew power reactor
operating licence for the Darlington
Nuclear Generating Station

Ontario Power Generation Inc.

Demande concernant le renouvellement
du permis d'exploitation d'un réacteur de
puissance pour la centrale nucléaire de
Darlington

**Commission Public Hearing
Part-2**

**Audience publique de la Commission
Partie-2**

June 24-26, 2025

24-26 juin 2025



May 5, 2025

Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa ON K1P 5S9

ATT: Senior Tribunal Officer, Commission Registry

Subject: Darlington NGS Power Reactor Operating Licence for a 30-year term

Dear Tribunal Officer,

E.S. Fox Limited (ESFL) endorses Ontario Power Generation's (OPG) application for renewal of the Darlington Nuclear Generating Station (DNGS) Power Reactor Operating Licence, PROL 13.03/2025, which expires on November 30, 2025.

Since its inception in 1990, the DNGS has consistently delivered safe, reliable, and cost-effective nuclear power without adverse environmental impact. This is the cornerstone of why OPG has earned and maintained the trust and support of the communities that it operates in. The refurbishment of all four Darlington reactors is scheduled for completion in 2026. This milestone further supports the case for a 30-year licence renewal, consistent with industry norms. CANDU reactors have proven to be reliable, setting industry records for some of the longest operating durations without an outage in the world, combined with its robust technology with multiple safety features ensure the safety of the public, OPG's employees and the environment.

OPG has gone to great lengths to develop and maintain its relationship with Indigenous communities and their members as it has collaborated with them through the Darlington Refurbishment, Darlington New Nuclear Project (DNNP) and the upcoming Pickering Refurbishment demonstrating the importance of their partnerships.

The Darlington Refurbishment Project and the DNNP both allow for additional power generation capacity at the Darlington Nuclear Generation Station (DNGS). This is critical as the global nuclear industry advances its nuclear power generation technologies, as Ontario's population continues to grow and as Canada moves towards becoming a Net-Zero country by 2050.



Another key benefit of the continued operation of the DNGS reactors is the manufacturing of key isotopes. OPG plans to utilize Darlington NGS reactors to support the commercial production of medical and industrial isotopes, such as Cobalt-60 (Co-60), Molybdenum-99 (Mo-99) and Yttrium-90 (Y-90). This will benefit millions of individuals for years to come.

E.S. Fox History with OPG Nuclear Operations

ESFL has provided Engineering, Procurement and Construction (EPC) project services, along with manufacturing and fabrication support to OPG for decades. The rich history between OPG and ESFL has provided many opportunities to learn over the millions of safe work hours provided. Today, as OPG prepares for the build of Canada's first Small Modular Reactor (SMR) and as they enter the final stage of the refurbishment of the four reactors, we are proud to stand by OPG and provide our support.

It is through witnessing OPG's consistency in delivering safe and reliable nuclear power to Ontario since 1971 that we are confident in endorsing the continued operation at the DNGS for the next 30 years.

Safety

OPG and E.S. Fox share a commitment to a "Safety First" work environment. Our corporate management goal and the goal of our employees is to ensure that everyone returns home safely at the end of each workday. Following OPG's lead, ESFL continues to refine our processes and practices to ensure a strong nuclear safety culture on all sites.

OPG is currently executing the refurbishment of DNGS's four reactors, one of the largest infrastructure projects in Canada. The refurbishment of DNGS Units 2 & 3 has been successfully completed with a strong safety record, refurbishment of the remaining two units is underway with an equally strong safety record to date.

The safety of the public and staff is OPG's top priority. OPG's Nuclear Power Generating Sites have been maintained and safely operated for over 50 years. OPG has been recognized for a long history of safe operations of its nuclear facilities as well as being leaders in protecting the public, its employees, and the environment. The commitment to improving the plant through continual investment has resulted in year-over-year improvement in all key areas. The plant's performance,



as well as OPG's commitment to safety, has allowed for open and respectful relationships within the communities they operate in.

Community Support

OPG supports its local communities. OPG's community partnerships include important institutions like the Bowmanville Hospital Foundation, Marigold Hospice Care, Feed the Need Durham, Scientists in School, Toronto & Region Conservation Authority, and the Oshawa & Durham Region Métis Council's Heritage Celebration.

OPG is a member of the Canadian Council for Indigenous Business (CCIB), championing the need for more Indigenous representation in businesses through employment and partnership opportunities. OPG's Indigenous Opportunities Network (ION) is a community-centred program that recruits Indigenous people for skilled trades, project management and administrative jobs within the energy sector. ESFL is a proud member of ION and continues to partner with OPG on its inclusion efforts. Through the ION program, ESFL had the opportunity to hire several Indigenous trades and non-trades employees. Furthermore, ESFL has followed OPG's lead in building relationships with Indigenous communities, supporting annual Trade Fairs and Pow Wows in Hiawatha and Alderville First Nations alongside OPG.

Furthermore, OPG's Corporate Citizenship Program provides community investment support to over 90 Indigenous initiatives including: reading and science camps, traditional culture and language initiatives, and youth amateur sports.

OPG has always demonstrated a strong commitment to the communities they serve. As ESFL has a long history with OPG, we see their efforts of:

- leveraging and coordinating Ontario's vast talents and competencies to make Canada a world leader in nuclear decommissioning.
- advancing innovative solutions for nuclear materials, with a continuing emphasis on minimizing the environmental footprint by reducing volumes and diverting and recycling clean materials.
- stimulating economic growth in Ontario using cross collaboration between organizations that will lead to the launch of projects and research and development opportunities; and
- collaborating and forming partnerships with the nuclear industry, community, local businesses, academia and Indigenous communities, as well as interprovincial and



international organizations to discover research, development and export opportunities for innovative nuclear energy solutions.

Environmental Benefits

OPG has taken the lead to support both Canada and Ontario's Net-Zero emissions by 2050 commitment. Since Ontario became the first North American government to eliminate coal-fired electricity generation, OPG has been a key contributor towards Canada's Environmental Net-Zero emission goals. 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 a net-zero economy by 2050. OPG as a company is committed to operating as a Net-Zero company by 2040.

OPG has been recognized numerous times for its commitment to protecting the wildlife that surrounds its sites.

- OPG Darlington received the 2019 Sustainability Award from the Greater Oshawa Chamber of Commerce.
- In 2020, OPG Darlington received a gold Wildlife Habitat Council Conservation Certification recognizing the specific efforts of DNGS's biodiversity program.
- OPG's Nuclear Operations hold a Gold Level Conservation Certification from the Wildlife Habitat Council (WHC). This achievement recognizes the specific efforts of our biodiversity programs, which aim to protect and nurture species and their habitats wherever the company operates.

Economic benefits

The DNGS refurbishment project commenced in 2016 and is scheduled to be completed in 2026, which will add 30 years to its nuclear operations. This project is estimated to generate a total of \$89.9 billion in economic benefits for Ontario, create and maintain 14,200 well-paying jobs, boosting personal income by an average of \$1.6 billion on an annual basis. This will also benefit Ontario residents with reliable, low-cost power. ESFL has the privilege to supply EPC project services to the DNGS refurbishment project as an Extended Services Master Services Agreement contracted supplier and partner.

As planning continues for the DNNP, the economic benefits include direct and indirect employment



(including STEM and other high-tech disciplines and skilled trades), economic growth through partnerships with Canadian Nuclear Services suppliers and manufacturers, along with the purchase of services and products through the Canadian nuclear supply chain.

A 2023 Conference Board of Canada Study reviewing the economic impact of building four SMRs at the Darlington nuclear site found that:

- Building and operating four SMRs at Darlington will contribute approximately \$15.3 billion to Canada's GDP - \$13.7 billion of that to Ontario's GDP,
- The project will create and sustain 2,000 jobs each year in Canada over the next 65 years,
- Municipal, provincial and federal governments will see \$4.9 billion in tax revenues over 65 years,
- Ontario will reap 89 per cent of the economic benefit associated with the project.

These economic benefits are being realized both currently and, in the future, based on how OPG has and will safely operate its current fleet of reactors. OPG will continue to safely operate its existing reactors alongside the future SMRs.

Summary

Given OPG's proven performance and critical role in Ontario's clean energy future, a 30-year licence renewal for DNGS is fully justified and strongly supported by ESFL.

ESFL fully supports Ontario Power Generation's (OPG) application to renew the Darlington Nuclear Generating Station (DNGS) Power Reactor Operating Licence for a 30-year term. This endorsement is based on OPG's outstanding safety record, operational reliability, environmental leadership, and meaningful engagement with local and Indigenous communities.

OPG has demonstrated consistent excellence through the safe operation of its nuclear facilities, steady progress on the Darlington refurbishment, and proactive efforts to advance clean energy innovation, including SMRs and the production of medical isotopes.

Through initiatives such as the Indigenous Opportunities Network and Corporate Citizenship Program, OPG continues to strengthen its partnerships and invest in the well-being of the communities it serves. Economically, the Darlington projects support thousands of jobs and deliver lasting value for Ontario and Canada.



ESFL is proud to have partnered with OPG throughout Darlington's growth and looks forward to supporting the continued operation of the Darlington Nuclear Generation Station. We remain confident in OPG's ability to uphold the highest standards of health, safety, and environmental stewardship.

Given OPG's proven track record and essential role in supporting Ontario's clean energy transition, a 30-year licence renewal for DNGS is fully justified and strongly endorsed by ESFL.

Sincerely,
E.S. Fox Limited

A handwritten signature in black ink, appearing to be "Terry Warren", with a long horizontal stroke extending to the right.

Terry Warren, Director – Nuclear Services