



CMD 25-H2.46

Date: 2025-05-08

**Written Submission from  
Bruce Power**

**Mémoire de  
Bruce Power**

In the matter of the

À l'égard d'

**Ontario Power Generation Inc.**

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

**Ontario Power Generation Inc.**

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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 8, 2025

BP-CORR-00531-06503

Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater St  
PO Box 1046 Stn. B  
Ottawa ON K1P 5S9

Dear Members of the Commission,

**RE: Ontario Power Generation – Darlington Nuclear Generating Station**

Bruce Power is an electricity company based in Bruce County, Ontario. Our 4,200 employees are the foundation of our accomplishments and are proud of the role they play in safely delivering clean, reliable, nuclear power to families and businesses across the province and cancer-fighting medical isotopes around the world. Bruce Power has worked hard to build strong roots in Ontario and is committed to protecting the environment and supporting the communities in which we live.

Bruce Power requests the opportunity to orally present at the upcoming Part 2 Hearing for the Darlington Nuclear Generating Station. Ontario Power Generation (OPG) shares similar values to Bruce Power, with a commitment to Safety First, passion for excellence and has built a solid foundation on protecting the environment, the public and communities in its surroundings.

Bruce Power strongly supports Ontario Power Generation's (OPG) application to renew the Power Reactor Operating Licence (PROL) for the Darlington Nuclear Generating Station (NGS) for an additional 30 years, from December 1, 2025, to November 30, 2055. Bruce Power also supports OPG's commitment to ongoing engagement and seeking opportunities to meet the interests of the Indigenous Nations and the communities where they operate. Like OPG, Bruce Power is also supportive of decennial reviews throughout the 30-year licence term, where Indigenous Nations and communities and the public would have the opportunity to be heard before the Commission.

This letter focuses on two critical areas: operational safety and Indigenous engagement.

### **Operational Safety**

Darlington NGS has consistently demonstrated a robust commitment to operational safety, which is evident through its comprehensive safety programs and continuous improvement initiatives. The station's safety performance has been rigorously assessed and verified by the Canadian Nuclear Safety Commission (CNSC) staff, who have concluded that OPG's programs and processes assure the safe conduct of licensed activities.

Michael Rinker, Vice President,  
Regulatory, Environment and Sustainability  
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1. **Safety and Control Areas (SCAs):** Darlington NGS has maintained satisfactory ratings across all SCAs, including management systems, human performance management, operating performance, safety analysis, physical design, fitness for service, radiation protection, conventional health and safety, environmental protection, emergency management and fire protection, waste management, security, safeguards and non-proliferation, and packaging and transport. This consistent performance underscores the station's commitment to maintaining high safety standards.
2. **Periodic Safety Review (PSR):** OPG has conducted a comprehensive PSR, which includes a detailed assessment of the station's design, condition, and operation. The PSR identified strengths and areas for improvement, leading to the development of an Integrated Implementation Plan (IIP) to address any gaps and enhance safety. The CNSC staff have accepted the PSR and IIP, confirming that Darlington NGS will operate safely during the continued operating period.
3. **Emergency Preparedness:** Darlington NGS has a well-established emergency management program that complies with CNSC REGDOC-2.10.1, Nuclear Emergency Preparedness and Response. The station conducts regular drills and exercises, including full-scale exercises, to ensure readiness in the event of an emergency.
4. **Radiation Protection:** OPG's radiation protection program effectively protects workers, the public, and the environment. The program ensures that radiation doses remain well below regulatory limits, and continuous improvements are made to align with industry best practices. The station's performance in radiation protection has been consistently satisfactory, with no exceedances of regulatory dose limits.

### **Indigenous Engagement**

OPG is committed to meaningful engagement with Indigenous Nations and communities, recognizing the importance of incorporating Indigenous knowledge, values, and perspectives into its operations. The Darlington NGS licence renewal application includes several initiatives to strengthen Indigenous engagement:

1. **Commitment to Reconciliation** – evidenced by the OPG Reconciliation Action Plan, ongoing reporting, and updating of goals as OPG learn and grows,
2. **Commitment to Ongoing Engagement** – evidenced by the OPG Indigenous Relations Policy and maintaining framework agreements to engage on operations and efforts to engage on this application,
3. **Building Long-Term Relationships** – observed OPG at various hearings over last year, the level of engagement happening in this area and the efforts to engage and support strategic initiatives with Indigenous nations and communities is commendable.

In conclusion, the Darlington Nuclear Generating Station has a proven track record of operational safety and a strong commitment to Indigenous engagement. The renewal of the Power Reactor Operating Licence for an additional 30 years will enable OPG to continue providing safe, reliable, and low-carbon electricity to Ontario while fostering positive relationships with Indigenous communities. Bruce Power strongly supports OPG's licence renewal request and encourage the Commission to approve the application.

Senior Tribunal Officer, Commission Registry

May 8, 2025

Thank you for considering our support for this important licence renewal for OPG and the nuclear industry in advancing Ontario's clean energy future.

Sincerely,

**Michael**  
**Rinker**

Digitally signed  
by Michael Rinker  
Date: 2025.05.08  
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Michael Rinker  
Vice President,  
Regulatory, Environment & Sustainability  
Bruce Power