



CMD 25-H2.44

Date: 2025-05-08

**Written Submission from the
Power Workers' Union**

**Mémoire du
Power Workers' Union**

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.

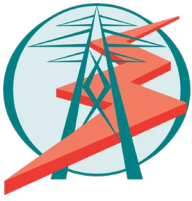
Demande concernant le renouvellement
du permis d'exploitation d'un réacteur de
puissance pour la centrale nucléaire de
Darlington

**Commission Public Hearing
Part-2**

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

June 24-26, 2025

24-26 juin 2025



**POWER
WORKERS'
UNION**

May 8, 2025

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

Re: Power Workers' Union Submission in Support of Darlington Nuclear
Generating Station Operating Licence Renewal

The Power Workers' Union (PWU), representing a significant portion of Ontario's skilled energy sector workforce, including thousands of professionals at the Darlington Nuclear Generating Station (DNGS), is pleased to submit this statement in strong support of Ontario Power Generation's (OPG) application to renew the power reactor operating licence for DNGS. As a union deeply invested in the safety, reliability, and sustainability of Ontario's energy infrastructure, we recognize the critical importance of DNGS to the province of Ontario and Canada.

Sincerely,

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Support for Licence Renewal

The PWU endorses OPG's application to renew the operating licence for DNGS for a 30-year period, based on the following key points:

1. Proven Safety and Regulatory Excellence

DNGS has operated safely for over three decades since its commissioning in the early 1990s. DNGS maintains an exemplary safety record, recognized globally for its robust safety systems and culture of continuous improvement. OPG consistently meets and often surpasses the stringent standards set by the Canadian Nuclear Safety Commission (CNSC). Our members, trained to the highest nuclear safety and emergency preparedness standards, are integral to this success, ensuring DNGS operates with the utmost care and accountability.

A Periodic Safety Review (PSR) was completed to confirm the condition and operation of the DNGS supporting continued commercial operation from 2025 to 2035 that was accepted by the CNSC in 2024.

During the proposed 30-year licence term, OPG will perform PSR and associated updates at an approximate 10-year frequency.

The PWU's and OPG's demonstrated commitment to safety at DNGS will continue.

The health and safety of PWU members on the job has been the one issue above all others that has dominated the PWU's focus throughout its history. Due in part to the strong collaboration between the PWU and OPG, OPG has seen exceptional health and safety records and a robust safety culture at all of their nuclear facilities. The PWU raises the following examples of continuing measures having a positive impact.

- Joint Health and Safety Committees
- Joint Policy Committee on Health and Safety
- Joint Health and Safety Working Committee
- Joint Committee on Radiation Protection
- PWU Health & Safety Committee

2. Critical Role in Ontario's Clean Energy Future

As a cornerstone of Ontario's electricity grid, DNGS provides approximately 20% of the province's power through reliable, carbon-free baseload generation. With growing demand for clean energy driven by electrification and climate goals, DNGS is

indispensable for ensuring grid stability and supporting Ontario's and Canada's decarbonization commitments.

3. Sustaining a Skilled, Unionized Workforce

DNGS employs thousands of PWU members—highly skilled tradespeople, technicians, and professionals—who take pride in delivering safe and efficient operations. Licence renewal secures these high-quality jobs, supports apprenticeship programs, and fosters training opportunities for the next generation of energy workers, strengthening Ontario's economy.

In Labour Relations, the PWU and OPG have an effective and mature relationship. Through regular meetings, issues are addressed and resolved at all levels, from the shop floor to the Executive offices. On-site Union leaders meet informally and formally with OPG's on-site management team to address and resolve local issues. Senior PWU Leaders meet both formally and informally with the OPG Chief Nuclear Officer and OPG's senior leadership. Regular meetings and conversations with the OPG President, Vice-presidents and leadership ongoing issues and initiatives will continue through the period of this license.

4. Successful Refurbishment and Future Readiness

The Darlington refurbishment project, one of Canada's largest clean energy initiatives, showcases OPG's expertise in project execution and engineering. With Units 2 and 3 refurbished and operational, and other units progressing on schedule for completion by the end of 2026, DNGS is poised for decades of continued safe and reliable performance. OPG has completed refurbishment milestones on time and on budget while maintaining exemplary safety standards for workers and the facility. This track record reinforces the PWU's confidence in OPG's ability to manage complex nuclear projects safely over the proposed 30-year licence period.

5. Commitment to Community and Environment

OPG's transparent engagement with local communities, Indigenous partners, and the CNSC has built public trust. Comprehensive environmental monitoring and stewardship initiatives protect Lake Ontario and the surrounding ecosystem, reflecting OPG's dedication to sustainability.

Conclusion

The PWU supports the 30-year licence renewal for DNGS based on its exemplary safety record, demonstrated through decades of incident-free operations, strict regulatory compliance, successful refurbishment safety management, and a strong focus on worker safety. These factors collectively assure the PWU that DNGS can continue to operate safely for the proposed period.

The PWU strongly urges the Canadian Nuclear Safety Commission to approve OPG's application to renew the operating licence for the Darlington Nuclear Generating Station for 30 years. This renewal is vital for delivering clean, reliable electricity, sustaining thousands of skilled jobs, and advancing Canada's climate and economic objectives. DNGS is a national and provincial asset, and its continued operation is essential for Ontario's energy security and environmental goals.

Respectfully submitted,

Power Workers' Union