



**Written Submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du
Conseil canadien des travailleurs
du nucléaire**

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



Canadian Nuclear Workers' Council

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May 08, 2025

Members of the Commission

c/o Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
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Reference. 2025-H-02

**CNSC Public Hearing on Ontario Power Generation's Application for renewal of the
Darlington Nuclear Generating Station Power Reactor Operating Licence 13.03/2025**

Dear President Tremblay and Members of the Canadian Nuclear Safety Commission:

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council's (CNWC) for the June 24-26, 2025 Public Hearing in the matter of Ontario Power Generation's (OPG) application for the renewal of the Darlington Nuclear Generating Station (DNGS) Power Reactor Operating Licence (PROL) 13.03/2025. The CNWC supports renewal of the DNGS PROL.

We also request an opportunity to provide an oral presentation at the Public Hearing.

Canadian Nuclear Workers' Council

The CNWC was established in 1993 as a Council of Unions with Members employed in Canada's nuclear industry. CNWC Affiliated Unions represent Workers from across Canada's nuclear sector, including: uranium mines and mills, nuclear fuel fabrication, nuclear power plant operation and maintenance, design and engineering, fabrication of components for nuclear facilities, medical isotope production, nuclear research and development, nuclear waste management, and nuclear construction, including refurbishment and decommissioning. CNWC Affiliates also include District Labour Councils in a number of our nuclear host communities.

Specific to this hearing, the Women and Men employed at the Darlington NGS are represented by the Power Workers' Union, the Society of United Professionals and Member Unions of the Provincial Building and Construction Trades Council of Ontario (Ontario Building Trades). Those Unions as well as the Durham Region Labour Council are CNWC Affiliates.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's nuclear industry,
- enhance public knowledge about Canada's nuclear industry, and
- share and learn from our experiences.

To achieve these goals the CNWC engages in a number of activities, including the preparation of policy papers, publication of a regular newsletter, participation in various information sharing events, engaging on social media and posting relevant information on our website <https://cnwc-cctn.ca>. We also hold an annual conference at locations that rotate amongst the various communities hosting Canada's nuclear facilities. Our 2023 conference was held at the Darlington Nuclear Information Centre. This provided a valuable opportunity for our Affiliates to tour the Darlington Site including the Darlington Nuclear Generating Station. Everyone was clearly impressed by everything they observed.

CNWC Affiliates are all strong independent Unions with a shared set of values. For all of them, safeguarding the continued health and safety of their Members is a priority. This has led to consistently high standards of occupational health and safety and environmental stewardship across Canada's nuclear industry including the Darlington Nuclear Generating Station. We know that occupational health and safety, public safety and environmental protection are intricately linked. Safer workplaces give rise to safer communities. Nuclear Workers live in the surrounding communities with their families and friends. Safety is paramount for the CNWC, CNWC Affiliates and their Members.

The CNWC is a regular participant in this regulatory process. We have participated in previous public hearings/meetings on the DNGS PROL, the Darlington New Nuclear Project (DNNP), the CNSC Staff's Annual Regulatory Oversight Reports (ROR) and we've maintained our involvement with updates in the interim.

Note: Some CNWC Affiliates have also submitted interventions for this public hearing.

In preparation for this submission we observed Day 1 of the Commission's Public Hearing on-line, reviewed OPG's application and OPG's submissions in support of their application: CMD 25-H2.1, CMD 25-H2.1B and CMD 25-H2.1A, and reviewed submissions from CNSC Staff assessing OPG's application: CMD 25-H2 and CMD 25-H2A.

Darlington Nuclear Generating Station and OPG's Application to renew the PROL

The Darlington Nuclear Generating Station consists of 4 Canadian Deuterium Uranium (CANDU) Reactors with a total installed capacity of 3,512 MW and a Tritium Removal Facility (TRF). The current PROL was issued on January 1, 2016 and it expires on November 30, 2025.

DNGS Units 1, 2 and 3 were successfully returned to service following refurbishment and the refurbishment of Unit 4 is in progress.

The Darlington NGS plans to expand their support for the production of isotopes.

OPG has a Licence to Construct a 300 MW Boiling Water Reactor at the DNNP site. This will be a GE-Hitachi BWRX-300. OPG plans to build a total of 4 BWRX-300s at Darlington.

Throughout the current 10-year licence period OPG has complied with the conditions of the DNGS PROL. OPG has demonstrated strong operational performance and commitment to protecting the health and safety of people and the environment.

The CNWC is in support of OPG's application to renew the DNGS PROL. Specifically:

- OPG has demonstrated they are qualified to carry out the licensed activities.
- OPG is clearly committed to the safe and reliable operation of the Darlington NGS.
- OPG continues to meet all the legal requirements of the Nuclear Safety and Control Act (NSCA) and the applicable Regulations.
- OPG has mature programs in place within each of the 14 Safety and Control Areas.
- OPG will continue to make adequate provisions to protect the health, safety and security of people and the environment.

CNSC Staff's Assessment

We support CNSC Staff's assessment of OPG's application as well as their conclusions, specifically:

- OPG has demonstrated stable safety performance during the current licensing period.
- OPG has conducted a Periodic Safety Review that assessed their compliance with modern standards and committed to any identified improvement initiatives.
- OPG is qualified to carry out the activities authorized by the licence.
- In carrying out those activities, OPG will make adequate provision for the protection of the environment and the health and safety of people.

We also support of CNSC Staff's recommendation that the Commission renew the DNGS PROL subject to CNSC Staff's noted conditions.

The CNWC has not previously supported a PROL with a term greater than 10 years. We recognize that PROL licence periods have been evolving in Canada and there are many activities that ensure compliance with the PROL. CNSC Staff's Annual Regulatory Oversight Reports (ROR) are beneficial. We believe it would be appropriate to also have a public licence review every ten years with an opportunity for the public to comment.

We would like to acknowledge the numerous activities undertaken by CNSC Staff related to regulatory oversight, compliance verification and engagement. This work is very much appreciated.

Concluding Remarks

We recognise this is outside the CNSC's mandate but we would like to highlight how essential the reliable electricity generated at the Darlington NGS is for the people of Ontario. Equally important are the great employment opportunities, the production of medical isotopes and the high level of support for the community.

OPG has proven to be a great corporate citizen and community partner. The result is a high level of community support for the Darlington Nuclear Generating Station.

DNGS has systems in place for the management of all Safety and Control Areas (SCAs). These systems are proven and effective, resulting in workplaces with standards of occupational health and safety that are second to none. The Darlington NPP has a strong record of safe operations with world class operating performance. We fully expect this high level of performance to continue.

The Union representing Workers at the DNGS have developed mature and effective working relationships with OPG.

The CNWC supports OPG's application and respectfully recommends the Commission renew the Darlington Nuclear Generating Station Power Reactor Operating Licence.

Thank-you to the Commission, CNSC Staff and everyone participating in this process. A transparent public process and strong regulatory oversight help maintain the high level of health and safety that we see in our workplaces and in our communities.

Respectfully submitted,

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