



CMD 26-M34.1

Date: 2026-07-31

**Written Submission from
Ontario Power Generation Inc.**

**Mémoire de
Ontario Power Generation Inc.**

In the matter of the

À l'égard de la

Ontario Power Generation

Update to the Commission on incidents
involving Injuries at the Darlington New
Nuclear Project construction site

Ontario Power Generation

Mise à jour pour la Commission
concernant les incidents ayant entraîné
des blessures au chantier de construction
du Projet de nouvelle centrale nucléaire de
Darlington

Commission Meeting

Réunion de la Commission

September 2, 2026

Le 2 septembre 2026

July 31, 2026

CD# NK054-CORR-00531-26717

Ms. Candace Salmon
Commission Registrar
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario, K1P 5S9

Dear Ms. Salmon:

DNNP – LTC: Update on Incidents Involving Injuries at the Darlington New Nuclear Project Construction Site (CMD 26-M34.1)

The purpose of this letter is to provide Commission Member Document CMD 26-M34.1 regarding OPG's submission on the incidents involving injuries at the Darlington New Nuclear Project (DNNP) construction site.

This submission provides an overview of OPG's response in [R-1] regarding CNSC staff's request pursuant to Subsection 12(2) of the General Nuclear Safety and Control Regulations related to worker injuries at DNNP [R-2].

Attachment 1 provides OPG's overview (CMD 26-M34.1).

Should there be any questions, please contact Mr. Mark Ferry, Senior Manager, Regulatory Affairs – DNNP Licensing by email at mark.ferry@opg.com.

Sincerely,



Mark Knutson
Senior Vice President
Enterprise Engineer and Chief Nuclear
Engineer
Ontario Power Generation Inc.

Attach (1).

cc: A. Viktorov - CNSC (Ottawa)
A. Bulkan - CNSC (Ottawa)
S. Proulx - CNSC (Ottawa)
S. Eaton - CNSC (Ottawa)
B. Vary - CNSC (Ottawa)
N. Abonasara - CNSC (Ottawa)
B. Rzentkowski - CNSC (Ottawa)
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D. Ouellette - CNSC (Ottawa)
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A. Asongtia - CNSC (Ottawa)
K. Cormier - CNSC (Ottawa)
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- References: R-1. OPG Letter: M. Knutson to A. Viktorov, "DNNP-LTC: Submission of Vendor Effectiveness Assessment Summary", June 30, 2026, CD# NK054-CORR-00531-26674.
- R-2. CNSC Letter, A. Viktorov to B. Jackowski, "Request pursuant to Subsection 12(2) of the General Nuclear Safety and Control Regulations: Darlington NGS – Worker Injuries at the Darlington New Nuclear Project", July 25, 2025, e-Doc# 7554205, CD# NK054-CORR-00531-11340.

ATTACHMENT 1

OPG Letter, A. Grace to K. Campbell, DNNP – LTC: Update on Incidents Involving Injuries at the Darlington New Nuclear Project Construction Site (CMD 26-M34.1), CD# NK054-CORR-00531-26717

Commission Member Document CMD 26-M34.1: Overview of Aecon Kiewit Nuclear Partners Vendor Effectiveness Assessment

Prepared by: S. Woolley

Verified by: M. Ferry

Attachment 1

CNSC Commission Member Document (CMD)

CMD: 26-M34.1

Date Submitted: July 31, 2026

Reference CMDs: 25-M36

Ontario Power Generation

One-day Public Meeting

Scheduled for: September 2, 2026

Overview of Aecon Kiewit Nuclear Partners Vendor Effectiveness Assessment

Introduction

Purpose

The purpose of this Commission Member Document is to provide the Commission with a summary of OPG's submission regarding the effectiveness of corrective actions implemented by Aecon Kiewit Nuclear Partners (AKNP) under its Safety Improvement Program at the Darlington New Nuclear Project.

Background

On June 30, 2026, OPG submitted a summary of a vendor effectiveness assessment regarding corrective actions implemented by AKNP in response to worker safety incidences at the Darlington New Nuclear Project [R-1]. Specifically, the submission followed CNSC staff's request for additional information pursuant to subsection 12(2) of the General Nuclear Safety and Control Regulations [R-2]. The submission provided information on the status, effectiveness, and sustainment of those corrective actions and the extent to which those actions have improved performance.

Highlights

Corrective Actions/Results

AKNP's Safety Improvement Program corrective actions focused on four principal areas leading to the results as described below:

- **Safety Culture**

Improvements were noted in workforce engagement, observation quality, corrective action closure, and reduction of repeat deficiencies. Workforce behaviours and expectations are more aligned than previously observed, while continued sustainment remains ongoing.

Metrics: Leading indicators improved from ~50-80% to consistently $\geq 100\%$ of targets; observation, inspection, and verification activities routinely achieve $>100\%$ completion; ~29% increase in quality observations; submission quality improved from ~30-50% to ~60-80% high-

quality; over 240 corrective actions completed year-to-date with low open backlog; reduction in repeat deficiencies.

- **Front-Line Field Presence**

Leadership visibility and engagement in the field have improved. Increased participation in inspections, observations, and verification activities is presented as evidence of stronger oversight and more timely hazard recognition and response. The material also notes that consistency remains variable across work fronts, shifts, and subcontractors.

Metrics: Field activity completion improved from ~50-80% to sustained $\geq 100\%$, with Critical Control Verification, inspections, and observations achieving ~105-130% of targets; full supervisory participation in safety activities; increased real-time hazard identification and correction; improved pre-job brief quality and workface verification.

- **Procedures and Protocols**

Reported improved procedural adherence and stronger verification practices. Increased supervisor involvement and greater emphasis on field-based confirmation of compliance. However, the material notes that consistency may be less robust in dynamic or changing work conditions.

Metrics: Verification activities improved from ~50-80% to consistently $\geq 100\%$; reduction in repeat deficiencies across key control areas; increased supervisor involvement in competency and control verification; shift from document-based compliance to field-based verification.

- **Planning and Coordination**

Reported improvement in readiness processes, integration of hazards and controls, and coordination among planning, engineering, and execution functions. At the same time, effective variability remains at the work-front level, particularly with respect to readiness consistency, design inputs, and subcontractor execution.

Metrics: ~85% of work progresses through formal readiness processes; Percent Plan Complete sustained at $>80\%$; improved integration of hazards, controls, and sequencing; enhanced coordination across planning, engineering, and execution.

Conclusion

OPG's assessment is that the corrective actions implemented by AKNP under its Safety Improvement Program have been effective and have resulted in measurable improvement at the Darlington New Nuclear Project. Improvements have been observed in safety culture, field presence, procedural discipline, and planning and coordination.

The information is supported by internal performance monitoring, governance oversight, field feedback, and an independent reassessment by a third party.

The inclusion of OPG oversight observations indicating improved site conditions and safer work execution provides an additional basis for concluding that the corrective actions are contributing positively to project performance.

- References:
- R-1. OPG Letter: M. Knutson to A. Viktorov, "DNNP-LTC: Submission of Vendor Effectiveness Assessment Summary", June 30, 2026, CD# NK054-CORR-00531-26674.
 - R-2. CNSC Letter, A. Viktorov to B. Jackowski, "Request pursuant to Subsection 12(2) of the General Nuclear Safety and Control Regulations: Darlington NGS – Worker Injuries at the Darlington New Nuclear Project", July 25, 2025, e-Doc# 7554205, CD# NK054-CORR-00531-11340.

Summary of Regulatory Commitments

CD# NK054-CORR-00531-26717

Submission Title: DNNP – LTC: Update on Incidents Involving Injuries at the Darlington New Nuclear Project Construction Site (CMD 26-M34.1)

Regulatory Commitments (REGC):

No.	Description	Date to be Completed
	None	

Regulatory Management Action (REGM):

No.	Description	Date to be Completed
	None	

Regulatory Obligation Action (REGO):

No.	Description	Date to be Completed
	None	

CNSC Action Requested: None.