



**Written submission from  
Moltex Energy**

**Mémoire de  
Moltex Energy**

In the Matter of the

À l'égard de

**Darlington New Nuclear Project**

---

**Projet de nouvelle centrale nucléaire de  
Darlington**

---

Application to renew the nuclear power  
reactor site preparation licence for the  
Darlington New Nuclear Project

Demande de renouvellement du permis de  
préparation de l'emplacement d'une centrale  
nucléaire pour le projet de nouvelle centrale  
nucléaire de Darlington

**Commission Public Hearing**

**Audience publique de la Commission**

**June 10, 2021**

**10 juin 2021**



April 21, 2021

Commission Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario K1P 5S9

**Re: Moltex Energy Written Submission in Support of Application for Renewal of OPG's  
Darlington New Nuclear Power (DNNP) Reactor Site Preparation Licence (PRSL)**

Moltex Energy is a privately held company striving to solve the world's most critical challenge: providing sufficient clean, reliable and affordable energy. In collaboration with innovators and energy experts, the company is developing a small modular reactor that will help keep fossil fuels in the ground.

Moltex's success in Canada is dependent on the continued safe and secure operation of all nuclear power facilities. It is therefore in Moltex's best interest to ensure nuclear operations are safe, protect people and the environment, and meet licence requirements.

Nuclear energy generation provides safe, reliable, low-cost, carbon-free electricity to millions of homes and businesses across Ontario and New Brunswick. After hydro, it is the largest provider of carbon-free electricity in Canada. By nearly all accounts, there is no path to net-zero without the use of nuclear energy. On many occasions, the Government of Canada has expressed its strong support for nuclear energy, including the continued operation of conventional CANDU reactors and the development of new forms of advanced Generation 4 reactors.

In addition to owning and operating 10 CANDU reactors, Ontario Power Generation (OPG) is taking steps to deploy a new, advanced reactor at its Darlington site. This site will enable the deployment of new nuclear energy faster than any other location, which is an important consideration in the fight against climate change.

In 2012, OPG underwent a thorough environmental assessment (EA) to obtain a licence to allow site preparation activities to support future nuclear generation. As part of the EA, OPG conducted multiple in-depth studies and engaged extensively with the public, Indigenous communities and other stakeholders to ensure the site and proposed activities would not cause any significant harm to people and the environment. The conclusion was that as long as specific mitigation activities were conducted and OPG commitments were upheld, the project was safe and fair.

OPG has been dutiful in meeting all its site preparation licence requirements since 2012, including conducting bank swallow mitigation activities, and submitting annual reports and a mid-term licence report to the CNSC. These activities and reports demonstrate that OPG is a responsible licensee who will continue to do what is mandated.



It is important to consider that OPG is not requesting to change the scope of the original licence granted by the CNSC in 2012. While minor adjustments have been made, their impacts are not significant, and do not invalidate any previous findings.

Though OPG is still undergoing the process of selecting new nuclear technology for deployment at the proposed site, the selected technology must meet all the site preparation licence criteria. And even then, the selected technology must obtain a license to construct and a licence to operate, both of which are thorough and rigorous processes.

OPG has met all applicable regulatory requirements and applied best practices in obtaining and maintaining its site preparation license. Based on our communication with OPG, there have not been any changes to the scope of the licence, and therefore no reason not to respect the previous conclusion on the suitability of the Darlington site for a new reactor. Most importantly, there remains no reason why this license would pose unnecessary risk to the public, workers or the environment.

In conclusion, Moltex believes that OPG's licence renewal application is reasonable and should be accepted.

Sincerely,

Kun Chen  
Vice President, Licensing and Regulatory Affairs  
Moltex Energy