



Oral presentation

Exposé oral

**Written submission from the
BWXT Canada Ltd.**

**Mémoire de
BWXT Canada Ltd.**

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



May 3, 2021

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: cns.interventions.ccsn@canada.ca

Re: Renewal of Ontario Power Generation Inc.'s nuclear power reactor site preparation licence for the Darlington New Nuclear Project (June 9-10 Public Hearing)

Dear President and Commission Members,

I am writing on behalf of BWXT Canada Ltd. (BWXT) to voice our support for the 10-year renewal of Ontario Power Generation Inc.'s (OPG) nuclear power reactor site preparation licence for the Darlington New Nuclear Project (DNNP).

BWXT is a longstanding and trusted global supplier of nuclear components, fuel, services and medicine and today operates 10 locations across Canada with approximately 1500 skilled employees. Our experience in supplying OPG with components, fuel and services reaches back many decades, starting with the Pickering Nuclear Generating Station and continues today for both Pickering and Darlington Nuclear Generating Stations.

Clean energy and achievement of Canada' climate change commitments

Nuclear energy is an important part of Canada's current non-carbon energy mix and it will be even more critical going forward. BWXT is mindful of the tremendous reduction in greenhouse gases that resulted from the restart of six reactors in Ontario, enabling the elimination of coal fired electricity plants in the province. We believe that CNSC's regulatory approval of OPG's site preparation licence to support the DNNP is essential to the future of continued clean air and affordable electricity generation in Ontario. Further, new nuclear is critical to achieving net-zero emissions by 2050 and essential for Canada's climate change goals overall.

Trusted operator, transparent and safe operations

From a technical perspective, BWXT is confident that OPG has adequately undertaken the DNNP site evaluation to ensure the licence application has been reviewed against applicable regulatory requirements, current codes, standards and practices and current site baseline data. BWXT is also confident that OPG's evaluation has confirmed the suitability of the DNNP site for new nuclear generation and that all site preparation activities will be carried out without any negative impact to OPG employees, the public or the environment. Our confidence comes from over 50 years of interactions with OPG on a variety of contracts and projects, where OPG has held itself and those it does business with to the highest possible standards of industrial and nuclear safety, and regulatory compliance. As a key industry partner, BWXT has first-hand experience working alongside OPG personnel and can attest

to the strong nuclear safety culture exhibited by its people throughout its facilities. It is this nuclear safety culture that has enabled OPG's proven track record of operational excellence and collective commitment to safety which is consistently demonstrated by OPG personnel in the operation of OPG's facilities. BWXT is confident that OPG will remain committed to upholding this nuclear safety culture and operational excellence for any future nuclear generating facility, and in the licensing process of the DNNP.

Investment in Ontario's and Canada's future

OPG's impact goes beyond safely producing clean, reliable and affordable electricity for Ontarians. In fact, OPG plays a key role in Canada's economy contributing billions annually, and employing thousands of skilled workers to generate the electricity Ontario relies upon. What's more, Ontario's nuclear supply chain, an economic powerhouse which represents tens of thousands of Ontario jobs, relies upon projects like DNNP to proceed in order to survive and thrive. Ontario should be proud of the supply chain it has built, but it must be nurtured, and new nuclear is essential to its survival and growth.

Importantly, OPG also partners with its communities, including environmental and Indigenous groups to help make a positive difference where it operates. OPG understands the importance of giving back and it works in the community to protect the environment through biodiversity education and enhancement, all while innovating for a greener and cleaner tomorrow.

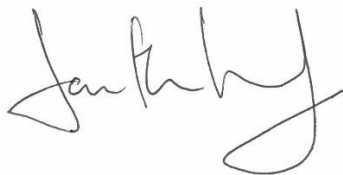
BWXT supports the renewal of the renewal of the site preparation licence

As an integral organization within Ontario's nuclear supply chain, BWXT can confidently state that there are few projects more critical to the future health and welfare of our province and country than that of DNNP. It is for these reasons that BWXT is proud to support the renewal of OPG's nuclear power reactor site preparation licence for the DNNP for a period of 10 years. BWXT is confident that OPG is qualified to carry out the licensed activities and will continue to take the necessary steps to protect the health, safety and security of its employees, the public and the environment.

OPG has been and will continue to be a leader in the generation of clean, reliable and affordable electricity, but requires this licence renewal to continue innovating for the future benefit of all Ontarians.

BWXT thanks the CNSC for this opportunity to intervene and wishes to appear at the public hearing on June 9-10 with an oral intervention should the Commission approve.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Lundy', written in a cursive style.

Jonathan Lundy

Vice President, Strategy & Business Services
BWXT Canada Ltd.