

# Request for Confidentiality of Material Submitted in Relation to

## Application to change the lutetium-177 production process at Bruce A and B Nuclear Generating Stations CMD: 26-H110

This form supports the [Directive on Requesting Confidentiality](#). Review the Directive for important information about completing this form and the documents that must be submitted with it.

The completed form and attachments **must be submitted to** the [Commission Registrar](#).

With regard to: **Application to change the lutetium-177 production process at Bruce A and B Nuclear Generating Stations**

I, Lisa Clarke, am an authorized representative of Bruce Power. I understand that:

- material provided to the Canadian Nuclear Safety Commission (“the Commission”) as part of a public hearing will be made publicly available unless the Commission makes a decision to protect it; and
- regardless of any request for confidentiality and decision by the Commission, the material may be disclosed if the Commission is required by law to disclose it (for example, after a request under the [Access to Information Act](#)).

I hereby request that the Commission take measures to prohibit the publication and disclosure of the following information under rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#) (the Rules).

**NOTE 1:** Any additional protective measures being requested must be identified in a letter attached to this form.

### Material for which a request for confidentiality is submitted:

The material that is subject to this request for confidentiality is clearly identified in Table 1, below.

**NOTE 2:** Where the request for confidentiality applies only to part of a document, relevant portions must be clearly identified “CONFIDENTIAL” to distinguish them from content that is non-confidential.

**NOTE 3:** The Commission is not responsible for any copyright infringement due to its publication on the CNSC website of documents that have been written by a third party.

Request for Confidentiality

Table 1: Material subject to the request for Confidentiality				
	Item Name	Portion(s) covered by the Request for Confidentiality	Applicable Criteria Check all that apply	Rationale Explain how the criteria in Rule 12 applies and how the summary or redacted version satisfies the public interest
1.	BP-CORR-005 31-07381; Attachment B	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	Attachment B contains commercial and technical information that is consistently treated as confidential. Additionally, this information is considered sensitive information, pursuant to the Nuclear Security Regulations, Section 1, as its disclosure could compromise nuclear security.  A non-confidential/non-sensitive summary has been prepared and may be released to the public. As the remaining confidential details contained in Attachment B provide specifics on Bruce Power practices and security measures (i.e., sensitive, commercial, and technical information), there is no public interest in disclosure of this information.

Request for Confidentiality

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**Attestation:**

1. I confirm that the above-noted material is not available through any public sources.
2. I have attached a **summary** or **redacted** version of the material that minimally impairs the public nature of this proceeding.
3. I understand that if this request is not approved by the Commission, I will have the option of withdrawing the material.
4. I further understand that if the material is not withdrawn it will be part of the public record as per rule 15 of the Rules.
5. I understand that upon receipt of this request, the Commission Registrar will treat the material that is subject to this request as confidential unless and until the Commission makes a ruling.

**Attachments:**

- This request applies to BP-CORR-00531-07381, Attachment B Confidential Hot Cell Security Regulatory Compliance Proposal.

**Authorized signature:**

Signed by:  
  
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Lisa Clarke, Director, Regulatory Affairs

April 22, 2026  
Date

BRUCE POWER  
LAW DIVISION

Name: RS  
Date: Apr 22, 2026

**Attachment D**

**Non-Confidential Summary of Hot Cell Security Measures**

**Attachment D:  
Non-Confidential Summary of Hot Cell Security Measures**

**1.0 Introduction**

This section provides a non-confidential summary of the physical and procedural security measures that will be implemented to protect the nuclear material that will be present at the Central Maintenance Facility (CMF) once the new hot cell is operational. These measures will meet all relevant aspects of the Nuclear Security Regulations and provide clear, actionable steps that address access control, assessment, and nuclear material management.

**1.1 Nuclear Material Management**

Nuclear material management processes are designed to ensure that nuclear substances are under appropriate control at all times. These processes ensure that qualifying nuclear substances are only present under defined conditions and are managed in accordance with approved procedures by trained and qualified personnel. Any deviations from established requirements are addressed in accordance with internal reporting and follow-up processes.

**1.2 Access Authorization and Control**

Access to areas where nuclear substances may be present is limited to individuals with appropriate qualifications. Authorization processes are established to ensure that access is granted and maintained in a controlled and accountable manner.

**1.3 Assessment and Monitoring**

Arrangements are in place to monitor nuclear substances and to support timely identification of unauthorized access or deviations from approved conditions.

**1.4 Regulatory Alignment and Continuous Improvement**

All processes are aligned with the Nuclear Security Regulations. Bruce Power will continue to monitor regulatory developments, perform internal verification activities, and update procedures and training as required to ensure continued compliance and alignment with regulatory expectations.

**1.5 Conclusion**

Through the implementation of structured nuclear material management, controlled authorization processes, and ongoing assessment and oversight, the CMF will be fully compliant with applicable nuclear security requirements and all nuclear material that may be present will be protected.