



**Written submission from  
Promation Nuclear Ltd.**

**Mémoire de  
Promation Nuclear Ltd.**

In the Matter of

À l'égard de

**Bruce Power Inc. – Bruce A and B  
Nuclear Generating Station**

**Bruce Power Inc. - Centrale nucléaire de  
Bruce A et Bruce B**

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Request for a ten-year renewal of its Nuclear  
Power Reactor Operating Licence for the  
Bruce A and B Nuclear Generating Station

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Demande de renouvellement, pour une période  
de dix ans, de son permis d'exploitation d'un  
réacteur nucléaire de puissance à la centrale  
nucléaire de Bruce A et Bruce B

**Commission Public Hearing – Part 2**

**Audience publique de la Commission –  
Partie 2**

**May 28-31, 2018**

**28-31 mai 2018**



April 15th, 2018

Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046,  
Station B Ottawa, ON  
K1P 5S9

Attention: Louise Levert, Secretariat

Subject: Request for Intervention RE: 2018-H-02, Revision 1, Notice of Public Hearing,

*"Application from Bruce Power Inc. (Bruce Power) to renew its Nuclear Power Reactor Operating Licence for the Bruce Nuclear Generating Stations (NGS) A and B for a period of 10 years"*

To Ms. Levert,

Please accept this request to consider Promotion Nuclear Ltd.'s oral and written intervention on the CNSC's upcoming Public Hearing, Part 2, for Bruce Power's application to renew its Nuclear Power Reactor Operating Licence for the Bruce Nuclear Generating Stations (NGS) A and B for a period of 10 years, being held in Kincardine, Ontario, on May 30th and May 31st.

Promotion Nuclear Ltd. is an established Small-Medium sized Enterprise (SME) who's long term viability and success relies on a healthy and sustainable nuclear industry. As such, given our position as a representative SME employing nearly 50 people, we firmly believe it is very important our voice and position be considered during this hearing, so we may convey and express the impact a 10 year licence extension on Bruce Power's operations would have on the continued growth and sustainability of our business.

Originally founded in 1995, Promotion—a leading designer and manufacturer of high-quality tooling, automation, and robotic systems—is a privately owned Canadian Corporation that embodies its commitment to embracing ethnic, gender, and cultural diversity within our business practices, and we are proud to be an inclusive, socially responsible corporation.

Promation is supported by our four divisions; Nuclear, Automotive, Industrial, and Defence. Promation Nuclear Ltd has been delivering custom engineered solutions to the nuclear industry for over a decade, and has been a reliable Tooling partner to Bruce Power since 2011.

Over this time, Bruce Power and Promation have shared a commitment to a "Safety First" work environment. Our corporate management goal and the goal of our employees is to ensure that

everyone returns home safely at the end of each work day. We, together with Bruce Power, continue to enhance our processes and practices to ensure a continued nuclear safety culture is not only maintained, but strengthened. Having worked closely with Bruce Power over the years, their commitment to safety is very evident with their proven record of safe operation since 2001 as they work towards achieving their long term business goals. As such, we enjoy the privilege of being able to draw inspiration and leadership from them as we advance the effectiveness of our own safety and nuclear culture within our own organization.

Recently, Promation Nuclear was awarded a contract for design and supply of Reactor Mock-ups required for Bruce Power's Major Component Replacement (MCR) program worth in excess of \$4M (<http://www.brucepower.com/promation-nuclear-ltd-to-design-and-supply-fuel-channel-mock-ups-bruce-power-mcr/>). This project--as well as others anticipated to follow--have helped facilitate Promation Nuclear's growth and expansion, resulting in the opening of our first official office location outside of our headquarters in our 20+ year history.

This office, located in Port Elgin, in the township of Saugeen Shores, has allowed Promation to readily engage with and support with the local community. Promation--as an organization and culture--is very committed to true localization and engagement within the communities in which we operate. We truly embrace the importance of drawing upon our profile in the industry and collective experience to engage communities, enlighten and empower youth, build awareness to the positive aspects of engaging in STEM and Skilled Trades careers. We believe that embracing sustainable community engagement also results in creating a sustainable business and corporate culture.

Accordingly, we can directly attribute our localization efforts in the Saugeen Shores region and the resulting positive and noticeable impacts within the community directly to Bruce Power's MCR program, as attested by the enclosed letters of support provided by local community stakeholders in support of Promation's bid for the Business of the Year award (<http://www.thebrassawards.ca/>).

Additionally, through Bruce Power's direct efforts to lobby and engage their supply chain to embrace positive Indigenous Relations, Promation Nuclear has begun the journey of awareness and acknowledgement of Indigenous considerations as a core tenement of fundamental business. As a result, we have begun to realize the deep and meaningful understanding of the power Canadian businesses play in manifesting sustainable reconciliation with the nation's indigenous peoples.

Inspired by the launch of Bruce Power's own 'Indigenous Relations Supplier Network' in the summer of 2017--of which, we are a participating member--Promation played a leadership role in the establishment and initiation of the First Nations, Metis, and Inuit (FNMI) sub-committee of the Organization of Canadian Nuclear Industries (letter enclosed). Led by Promation's own Director of Business Development, and a member of the Six Nations of the Grand River, the FNMI subcommittee was established to help drive the awareness and promote Indigenous engagement across OCNI's 240+ member companies.

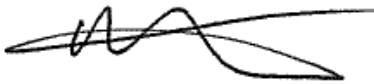
Following this, Promotion is increasingly playing a leading role in the Nuclear industry from our position as a Canadian SME, and are one of the first Nuclear SME's to join the Canadian Council of Aboriginal Business (CCAB), and further, to sign on to their Progressive Aboriginal Relations (PAR) program. Through the PAR program, we have begun the process of developing and implementing embedded policies and procedures to manifest meaningful initiatives to increase Indigenous content within our procurement practices, and have created increased employment opportunities for indigenous peoples within our organization.

As a result, we are proud to declare that our first local, full-time hire of our Port Elgin office is a young woman of First Nations status. Drawing upon her previous experience in community engagement with numerous First Nations territories across North America, this future leader of our company will play a leading role in Promotion's integration of deeply entrenched Indigenous considerations in our overall business practices, as well as broadening our connection and relationship with indigenous communities in the regions in which we operate, especially the Saugeen-Ojibway Nation (SON) and Nawash in Grey-Bruce County.

In short, were it not for Bruce Power's ongoing operations, subsequent planned MCR life extensions, and their leadership in promoting awareness and fostering localization and Indigenous engagement, Promotion would not have engaged in the manner in which we have, and we would be a lesser company for it.

In summary, given the significant impact the CNSC's granting of a 10-year Licence Extension for Bruce Power has on Promotion Nuclear's ongoing viability, the substantial community development and economic prosperity in the Bruce County region, and our pursuit to ingrain and manifest meaningful reconciliation initiatives with the Indigenous peoples, we request the granting of our request for both a written and oral intervention on the Public Hearings being held on May 30th and 31st.

Sincerely,



Darryl Spector, P.Eng, PMP  
President

Attachments:

Letters of Support, Promotion Nuclear BRASS Application  
Letter of Announcement, Establishment of OCNI's FNMI Subcommittee





Town of Saugeen Shores  
600 Tomlinson Drive  
Port Elgin, ON N0H 2C0

BRASS Awards Committee  
c/o Saugeen Shores Chamber of Commerce  
559 Goderich St.  
Port Elgin, ON N0H 2C1

March 12, 2018

Attn: Selection Committee, BRASS Awards

Please accept this letter of support regarding the nomination of Promotion Nuclear for a BRASS Award.

Since arriving in Saugeen Shores in June 2017, Promotion Nuclear has invested thousands of dollars and an invaluable amount of time and expertise into the community – they have made a significant **commitment to the community**. From sponsoring swimming and skating events, to being the first nuclear supplier to step up and support the Gran Fondo event, the team at Promotion continues to make a difference.

Some of the efforts shown by Promotion Nuclear have no dollar sign attached but these efforts are making more of an impact than money can buy. Promotion Nuclear was the driving force behind a recent panel discussion at Saugeen District Secondary School. This panel discussion was to encourage students to explore trades and utilize existing tech programs offered in their school. Promotion believes in supporting our youth and demonstrate support in building our future.

When Promotion committed to the silver sponsorship level with the Gran Fondo, they challenged their peers. Social media was buzzing with nuclear suppliers wanting to learn more, and wanting to step up and show their support. Darryl from Promotion joined the Shore Report (Town of Saugeen Shores podcast) to talk about supporting of the Gran Fondo and why it's important to their organization to support local events. In addition to supporting the Hospital Foundation, they are encouraging employees to be active and well, which is part of their **commitment for staff development**. The podcast discussion sparked additional interest in the fundraising event for the Hospital Foundation, and supports Promotion's belief in **innovative and creative promotion**.

The team at Promotion is well connected and is leading the nuclear industry into what it means to truly localize in Bruce County. Promotion came to town to support the Bruce Power Major Component Replacement project, but they are doing more than supporting Bruce Power, they are supporting our community. They are **committed to quality** in what they do, and how they act.

I support the nomination of Promotion Nuclear in the category of Business of the Year, and look forward to their continued community involvement and their business success in Saugeen Shores.

Sincerely,

Jessica Linthorne  
Manager, Strategic Initiatives  
519-832-2008 x 121  
[Jessica.Linthorne@saugeenshores.ca](mailto:Jessica.Linthorne@saugeenshores.ca)







SAUGEEN MEMORIAL HOSPITAL FOUNDATION



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t. (519) 797-3230, ext. 3230  
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info@smhfoundation.ca  
www.smhfoundation.ca

March 9, 2018

#### Brass Awards

c/o Saugeen Shores Chamber of Commerce  
559 Goderich Street, Ss4  
Port Elgin, ON N0H 2C1

To Whom It May Concern:

Please accept this letter in support of Promation Nuclear's nomination for a Brass Award this year. Promation Nuclear moved to the area in 2017 and immediately became involved in the local community.

Seeing the need for localization in support of Bruce Power's ongoing operations, Promation moved quickly to identify and secure a spot in Saugeen Shores. In August 2017, Promation secured office space in Port Elgin, co-located with the Saugeen Shores Chamber of Commerce and Service Ontario. Following this in November 2017, Bruce Power and Promation Nuclear Ltd., entered into an agreement valued at more than \$4 million in support of the Major Component Replacement (MCR) Project.

In December of 2017, Darryl Spector, Vice President and General Manager of Operations for Promation, heard about the Gran Fondo Lake Huron fundraising event for the Saugeen Memorial Hospital Foundation. He immediately recognized the value of sponsoring this event and how it aligns with Promation's corporate commitments to embracing ethnic, gender and cultural diversity within its business practices and pride in being an inclusive and socially responsible corporation. To that end, he contacted myself and we worked out an appropriate level of sponsorship which turned out to be the Silver level.

It is what happened next that makes Promation really special. They took the lead on helping to promote the sponsorships for the Gran Fondo to their colleagues. First Laveer Engineering came on board, and then the Organization of Nuclear Industries. Acuren, Bruce Power and Ian Trotman Engineering also followed suit. And two more nuclear companies have also joined in but cannot be named just yet. The total sponsorship dollars from Promation's influence add up to \$30,000!

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Promation Nuclear has come to Saugeen Shores with a commitment to this community that goes far beyond the work they will do with Bruce Power over the coming years. They have come with a heart of gold and will be looking for opportunities to make a difference. And for that, I truly believe that they deserve to win the 2018 Brass Award for Business of the Year.

Sincerely,

A handwritten signature in cursive script that reads "Sally Kidson".

Sally Kidson  
Executive Director  
Saugeen Memorial Hospital Foundation

cc: SMHF Board of Directors



# École Saugeen District Secondary School



Melissa McEwen , Principal  
Erin Paylor, Vice-Principal  
Shawna Davidson, Office Manager

780 Gustavus Street  
Port Elgin, ON N0H 2C4  
Telephone: (519) 832-2091  
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March 12, 2018.

BRASS Award Committee  
c/o Saugeen Shores Chamber of Commerce  
559 Goderich St.  
Port Elgin, ON N0H 2C1

To Whom It May Concern:

Please accept this letter in support of Promotion Nuclear's nomination for a BRASS Award.

Earlier this year, I had the opportunity to meet Darryl Spector, Vice-President and General Manager of Operations for Promotion, when he arrived at the school to drop off a cheque to financially support our Nordic Ski team. During our initial conversation, I realized that Darryl recognized, valued and was a strong proponent of the role of education in shaping our youth and making them contributing members within our changing society.

Promotion Nuclear, under the leadership of Darryl Spector, demonstrates commitment to the youth in the community of Saugeen Shores. Specifically, in on-going conversations with Darryl it was determined that there is a need to share a message about the importance of the skilled trades with students. Darryl reached out to his contacts to see if others would be willing to join Promotion Nuclear in speaking to the youth of Saugeen Shores. A panel of experts was formed and on February 26<sup>th</sup> 2018, a school-wide assembly occurred at Saugeen District Secondary School. Panel members shared their experiences and backgrounds. It is a concrete example of Promotion selflessly working with other businesses and organizations to put the priority of education at the forefront of an important conversation about the essential need for youth to value and explore skilled trades. I know this panel discussion is just the beginning of many innovative ideas Promotion Nuclear has to support our students at Saugeen District and within Bluewater District School Board.

I can honestly say that the school is regularly approached by various businesses who are looking to give lip service to an initiative or issue at the school so they can pad a resume or pat themselves on the back. As the administrator at the school, I spend time politely listening to these companies knowing that there will be disappointment when the school does not hear from the business, there is an expectation for the school to give more than we can in return, or there is a complete lack of follow through. In most cases, the school community is made to feel that we "owe" the business in some way and there is very little, if anything, done to support our students. I can confidently say that Promotion Nuclear is not one of these companies. Instead, Promotion is keen to work with the school as a partner, committed to listening to our concerns, decisive and effective in taking action, and willingly invests in our local youth by giving time and resources to provide support to Saugeen District Secondary School.

Promotion Nuclear is a company that leads by example and is principled in their actions. They recognize that it is a privilege to work in such a great community and it is their honour to give back to those who live here.

Promotion Nuclear deserves to win the 2018 BRASS Award for Business of the Year.

Yours sincerely,



Melissa McEwen  
Principal



August 18, 2017

James Scongack  
Vice President, Corporate Affairs & Environment  
Bruce Power  
e-mail: [james.scongack@brucepower.com](mailto:james.scongack@brucepower.com)

Jennifer Rowe  
Senior Vice President Corporate Affairs  
Ontario Power Generation  
e-mail: [jennifer.rowe@opg.com](mailto:jennifer.rowe@opg.com)

### **OCNI First Nations, Métis and Inuit (FNMI) Committee**

Dear James and Jennifer:

We commend Bruce Power and OPG for their initiatives to create opportunities for indigenous or aboriginal communities in the nuclear industry. OCNI would like to support and augment your initiatives by developing programs to bring First Nations, Métis, and Inuit peoples into the broader supply chain.

Accordingly, OCNI has formed a "First Nations, Métis and Inuit" Committee comprised of individuals from OCNI suppliers with knowledge and experience in interfacing and supporting FNMI Territories and their members. This initiative will be led by Michael Ruysseveldt of Promation Nuclear, who is a member of Six Nations of the Grand River. We plan to build this team with FNMI members who also represent OCNI companies. The OCNI FNMI Committee mission will be to "Lead in the development of FNMI content within the OCNI membership". The committee plans to develop innovative programs that are aligned with and/or integrated with Bruce Power and OPG programs and policies for FNMI engagement. The OCNI FNMI programs would support the training and education of FNMI individuals and allow their seamless transition into supplier apprenticeship programs where future industry needs have been identified. OCNI's FNMI Committee will not be focusing on individual Bands, but on broader FNMI territories across Ontario and Canada to tap into a larger pool of potential nuclear workers.

OCNI's FNMI Committee would like to work with Bruce Power and OPG Indigenous Relations representatives to ensure that we utilize best practices and avoid duplication of programs.

James, Jennifer: The OCNI FNMI Committee would like to meet with Bruce Power and OPG Indigenous Relations representatives to discuss how we can shape our initiative to best serve the FNMI communities and the nuclear industry. **Please let us know whom we should contact in your respective organizations.**



Ron Oberth  
President and CEO

cc: Mike Ruysseveldt, Promation Nuclear