



**Written submission from
ASI Group Ltd.**

**Mémoire de
ASI Group 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**

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

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

March 3, 2018

Carmen Sferrazza
ASI Group Ltd.
566 Arvin Avenue
Stoney Creek, ON L8E 5P1

c/o Ms. Louise Levert, Secretariat
Canadian Nuclear Safety Commission
280 Slater St., P.O. Box 1046
Ottawa, Ont. K1P 5S9

Dear Ms. Louise Levert, Secretariat,

As President and CEO of ASI Group Ltd. (ASI), I am pleased to submit this letter in support of Bruce Power's 10-year operating licence renewal. The 10-year operating licence renewal will continue to raise the bar for many small, medium-sized enterprises (SME) like ASI, to adopt the highest standard of Quality and Health & Safety which Bruce Power demands of their service providers and suppliers. Additionally, the renewal will promote opportunities and growth for SME's across Canada, and encourage companies to continue in their development of innovative solutions, benefiting the global market at large.

ASI and Bruce Power have developed world-first techniques and services that have improved safety and equipment reliability within a nuclear facility. We ensure the necessary procedures and plans are in place to protect the safety of the crew and facility in working in radiological environments. Our ability to work in irradiated environments eliminates the need for plant shut-down and allows for safe underwater inspection and repair, for asset management and maintenance. ASI is committed to the CNSC's radiation safety principal ALARA (as low as reasonably achievable) and operates under strict Quality Control/Assurance guidelines. We are the only company in Canada and, one of the few companies in the United States who are able to deliver this service successfully, in a safe and efficient manner.

The CNSC process is important especially in today's world, as we recognize the need for committed responsibilities to environmental impact and safety concerns. In ASI's 20 plus years serving various nuclear facilities across Canada and the United States, we find Bruce Power to have the highest and stringent standards regarding Environment, Quality and Health & Safety, in direct support of the CNSC process module. As a result, ASI has implemented our own Environmental Policy, applied an Electronic Project Management System as part of our Quality Assurance program and, we are currently reviewing (gap analysis) new requirements to new ISO9001:2015 which we aim to have completed this year. Regarding Safety, ASI has mirrored Bruce Power's goal of zero occupational injuries and commitment to the safety of our employees and contractors. We are proud our performance, with no serious injuries and only one lost time injury in our 30 years of operation.

Bruce Power continues to support important causes to the community, including the following:

- United Way Campaign
- Saugeen Ojibway Nation Youth Leaders
- Handbags for Hospice

- Spinal Cord Injury
- Wounded Warriors

Bruce Power also supports local hospitals with various charity initiatives. As a result, ASI along with other companies contribute in sponsorship, for Bruce Power's initiatives to raise money and awareness to aid these important causes.

The 10-year licence renewal will allow for continuous safe and environmentally-friendly power generation for Ontario, while enforcing the highest in Quality and Health and Safety and responsibility to the environment. I can say with confidence, ASI is able to tout our un-paralleled record in safety, reliability and effectiveness as a result of Bruce Power's high standards. Our 20-year relationship with Bruce Power has allowed ASI to grow to over 100 employees across Canada and in the United States, and serve our clients on a global scale. This is, in large, because we emulate Bruce Power's process and procedures, meeting and/or exceeding our clients' expectations, while delivering peace-of-mind.

I would be happy to provide further details upon request. Please feel free to contact me for further information or for any questions regarding this letter.

Sincerely,



Carmen Sferrazza
President and CEO, ASI Group Ltd.
566 Arvin Avenue
Stoney Creek, ON L8E 5P1
office: 905.643.3283
mobile: 905.321.7261
email: carmen@asi-group.com

ASI's services to Bruce Power

For over 20 years, we have been a proud service provider to Bruce Power, delivering water/wastewater operations and maintenance, zebra mussel monitoring and control and, underwater maintenance and repair services.

Services provided to Bruce Power include:

Site Specific Zebra mussel management

- Yearly service water treatment
- Yearly fire system COS treatment program
- Yearly biological monitoring for risk assessment

Marine services

- General under water inspection and maintenance
- Specialized diving in irradiated environments
- Remotely Operated Vehicle (ROV) inspection
- Marine geophysical surveying
- Robotic cleaning
- Underwater welding program

Water services

- Identification and Review of Options for IAD Sump Toxicity Abatement IAD Sump Toxicity Abatement; Chlorine Toxicity Removal Process Recommendation and Design
- Build and supply de-chlorination panels for the unit pumphouses

Our experience with the Nuclear Industry

ASI has served the nuclear industry for over 20 years, providing unique and innovative water/wastewater and, underwater maintenance and repair solutions. We are registered to ISO 9001:2008, and have been audited to the requirements of CSA Z299 by OPG. Through our corporate Quality Management System, ASI follows the requirements of CSA N286.1, N286.2 for Design for nuclear power generators, and provides highly qualified Professional Engineers and Technologists.

About ASI Group Ltd.

ASI Group Ltd. (ASI) was founded in 1987 as Aquatic Sciences Inc. by a team of technical professionals committed to provide industry and governments worldwide with integrated engineering, marine and environmental services. ASI is split into two specialized divisions: ASI Water which has extensive experience in design, build, and operation of drinking water and wastewater systems and ASI Marine, which offers a full range of underwater inspection, mapping and light construction services. Additionally, ASI is recognized as the industry leader in zebra mussel control research and design. We currently operate treatment systems utilizing chemical and nonchemical options for various industries and water treatment facilities throughout the Great Lakes region.

ASI has a combined staff of 200+ professionals encompassing Professional Engineers (civil, water-wastewater, electrical and mechanical), Professional Project Managers, Certified Engineering Technologists, Licensed Commercial Divers, Environmental Technicians, Certified Water-Wastewater Operators, Marine Geophysical and Hydrographic Specialists. We have a long history of service provision to water utilities (water intake and waste water discharge) power generation (both hydro and nuclear) in Canada, the United States, and Worldwide.