



**Written submission from
Women in Nuclear Canada**

**Mémoire de
Women in Nuclear Canada**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

*This page was intentionally
left blank*

*Cette page a été intentionnellement
laissée en blanc*



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

Re: BWXT Nuclear Energy Canada (NEC) Inc. Fuel Facility Operating Licence Renewal

Dear Madam President and Commission Members,

Women in Nuclear (WiN) Canada is pleased to support the application before the Canadian Nuclear Safety Commission from BWXT Nuclear Energy Canada (BWXT-NEC) Inc. to renew its Class IB Nuclear Fuel Facility operating licence for the fuel fabrication facility located in Toronto, Ontario and the fuel bundle manufacturing facility in Peterborough, Ontario for a period of ten years.

Women in Nuclear (WiN) Global was established in 1993 and is a world-wide not-for-profit association of women and men working professionally in various fields of nuclear energy and radiation applications. WiN Global currently has approximately 35,000 members with chapters from over 107 countries.

WiN Canada was established in 2004 and represents over 2,800 women and men across Canada. A large representation of WiN Canada members are employed in the nuclear energy sector. WiN Canada also welcomes members from industries which use and produce nuclear and radiation technologies, such as hospitals and medical facilities, mining, academic and research institutions, the wider electricity sector and the suppliers to all of these industries.

Since 2004, WiN Canada has worked towards three challenging goals. The first to make the public aware, especially women of the benefits of nuclear and radiation applications in food, health and energy. The second, to prepare women to take on leadership roles in the nuclear industry through knowledge, experience exchange and professional development opportunities. And the third, to help fill the growing need for qualified workers in STEM and skilled trades in the nuclear industry. Women represent approximately 20 per cent of the workforce in the nuclear industry. WiN Canada works to showcase the vital contribution women are making in the nuclear industry every day.

BWXT-NEC plays a vital role in the nuclear industry in Canada. BWXT-NEC supports the CANDU fuel and reactor fleet in Canada and is an essential component to continued operations. In Ontario, nuclear power provides more than 60 per cent of the electricity to residents and costs about 30 per cent less than the average residential price of electricity. The nuclear fleet in Canada produces enough electricity to power more than 10 million homes. In addition to low-cost, the energy produced from the nuclear fleet in Canada is free of greenhouse gas (GHG) emissions, and helps us meet our current carbon targets. In Canada, the nuclear industry helps avoid almost 80 million tonnes of CO₂ emissions every year.



The value proposition of the nuclear industry in Canada is strong, with a critical role in many areas including, medicine, industry, food safety, research and innovation. The Canadian nuclear industry supports approximately 76,000 jobs in Canada, many of which are high-tech and highly skilled. The nuclear industry brings more than \$6 billion in revenue annually in Canada and BWXT-NEC plays a key role in the industry.

BWXT-NEC has a long history of safe operations. Nuclear Safety is a core value at BWXT Canada and spans all levels of the organization, from the board room to the shop floor. In addition to exhibiting strong performance in all 14 Safety and Control Areas regulated by the CNSC, BWXT-NEC has a strong safety culture and the health and safety of its employees, the public and the environment is always their top priority. BWXT-NEC continues to operate safely in both Peterborough and Toronto, as can be seen in their very low emissions (well under the regulatory limit) and in the CNSC's Independent Environmental Monitoring report findings.

BWXT-NEC has undertaken an Environmental Risk Assessment (ERA) to address fuel pellet manufacturing at both its facilities should the need arise in the ten year licence period. The findings of this assessment were clear, no health or environmental impacts are expected as a result of BWXT conducting pelleting operations and fuel bundle assembly at its Peterborough facility.

In addition to the safe operations history of BWXT-NEC, and the reliance of the nuclear industry on their continued operations, BWXT-NEC has established a number of initiatives to support women in the workplace, which is a key interest to WiN Canada. First, BWXT-NEC has a Diversity and Inclusion Committee aimed at identifying barriers or conditions of disadvantage that could affect any of the four designated groups. This group meets on a regular basis and has established a communication plan that is planned for roll out in January 2020. In addition to this effort, BWXT-NEC also supports a 9/80 program, which is a flex hours program, providing an additional day away from the workplace. This program provides employees the opportunity to spend more time with family.

BWXT-NEC also has a Women's Network established at the Peterborough location. This network is aimed at supporting women in the workplace through a broader network. BWXT-NEC is looking at ways to improve this initiative and continue to celebrate the contribution women make to the organization. BWXT also recognizes the need for focus on their talent pipeline and encouraging more women to move into STEM-related or skilled-trades roles. BWXT-NEC supports the Ontario Tech University, Women for STEM initiative. This program is aimed at increasing the number of female students in the STEM-related programs. BWXT-NEC was the first sponsor for this program and has committed support through 2024. In the coming months, BWXT will be meeting with schools to start the conversation regarding women in trades and possibilities to partner/support an event to attract interested female trades students to BWXT.

BWXT-NEC is part of the Canadian Council of Aboriginal Businesses (CCAB) and is committed to building and sustaining positive relationships with Indigenous communities in the areas in which BWXT-NEC operates in Canada. BWXT-NEC is part of the CCAB's Progressive Aboriginal Relations (PAR) certification program. BWXT is also an active member within the Indigenous Relations Suppliers



Women in Nuclear Canada

c/o Redstone Agency Inc.
402-150 Eglinton Ave. E.
Toronto ON M4P 1E8
416.915.3020 x 101

www.canada.womeninnuclear.org

Network established by Bruce Power and also sits on the Indigenous Opportunities in Nuclear (ION) committee at Ontario Power Generation.

WiN Canada supports the application by BWXT-NEC for a renewal of the fuel fabrication operating licence for ten years. BWXT-NEC has proven its commitment to public and environmental safety through its actions and demonstrated performance. It is for these reasons and those outlined in this submission that WiN Canada fully supports the application submitted by BWXT-NEC.

Sincerely,

A handwritten signature in black ink, appearing to read 'LMB', with a long horizontal stroke extending to the right.

Lisa McBride
President
Women in Nuclear Canada