



**Written submission from
Bruce Power**

**Mémoire de
Bruce Power**

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

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January 22, 2020

Email: cns.interventions.ccsn@canada.ca

Subject: BWXT Nuclear Energy Canada's Licence Renewal

I am writing on behalf of Bruce Power in support of BWXT Nuclear Energy Canada Inc.'s (BWXT NEC) application to the Canadian Nuclear Safety Commission to renew its Class IB Nuclear Fuel Facility Operating Licence issued by the Canadian Nuclear Safety Commission (CNSC) for a period of 10 years.

BWXT NEC's and its parent company, BWXT Canada Ltd.'s commitment to excellence in safety has contributed to its long track record of safe operations. Nuclear safety is a core value at BWXT Canada and the entire organization, from its Board of Directors to its front line workers, places nuclear safety as the overriding priority. BWXT NEC ensures that all employees conduct themselves in a manner consistent with the behaviours of a healthy nuclear safety culture. Such conduct requires that staff always consider how their everyday activities can impact the fundamental safety functions of a nuclear facility.

Safety is BWXT NEC's number one priority and I have witnessed, first-hand, the focus each and every day on safe operations. BWXT NEC has been supplying the nuclear industry with fuel, equipment, components, engineering and field services needed to successfully and safely operate and refurbish nuclear power plants for over 60 years. BWXT NEC has extensive experience working with the CANDU® reactor and has been involved with Bruce Power since its construction, including the design and supply of the station's fuel handling systems.

BWXT NEC's work with Bruce Power has expanded greatly over the last 40 years to include reactor channel components and field engineering services. All of their work is held to the highest standards of safety and quality. A few examples of the high-quality work BWXT NEC performs for Bruce Power includes:

- BWXT NEC is the design engineer and original equipment manufacturer for the station's fuel handling systems, which includes on-going engineering support.
- BWXT NEC has supplied CANDU fuel bundles to the station over the years.
- BWXT NEC designs and supplies reactor channel components.
- BWXT NEC designed and delivered several remote inspection and maintenance tooling systems, including reactor component inspection tooling.

Having worked with BWXT NEC and its parent, BWXT Canada since the commissioning of the Bruce Nuclear Generating Station, we have experienced first-hand the high degree of importance that they place on safety. Protecting the health and safety of its employees, the public and the environment has been, and will continue to be, one of BWXT NEC's greatest responsibilities and

priorities. The company has a robust and well-established integrated management system for environmental, health and safety program excellence.

BWXT NEC has a comprehensive radiation protection program and is guided by the principles of ALARA (as low as reasonably achievable). They use the best and most current technology to ensure emissions from its facilities are as low as possible. The small amount of uranium emissions that do occur does not pose a risk to members of the public or the environment.

We recognize BWXT NEC is seeking the flexibility during the proposed next 10-year licence period to potentially produce pellets at both the Peterborough and Toronto facilities. BWXT NEC has a well-established and mature environmental monitoring program that has been effective in protecting human health and the environment. No health or environmental impacts are expected as a result of BWXT NEC conducting pelleting operations in addition to its current fuel bundle assembly operations at its Peterborough facility.

Nuclear energy plays a fundamental role in Ontario's clean-energy equation as 60 per cent of Ontario's daily electricity needs are supplied by the province's nuclear power with virtually no greenhouse gas (GHG) emissions. Ontario was the first jurisdiction in North America to end its use of coal-fired electricity, which it accomplished in 2014, and much of this success was made possible by Ontario's nuclear industry. Moving forward, it is important for Ontario to have a balanced supply mix that allows for the continued advancement of renewable technology, along with nuclear, to maintain these emission-reduction efforts. In addition, health care patients from around the world benefit from the production of medical isotopes at Ontario's nuclear plants including Cobalt-60 used in sterilization – while others, requiring life-saving radiation treatment, will benefit from the production and stable supply of medical grade Cobalt.

In closing, I would like to reiterate our support for the licence application as BWXT NEC is well qualified to continue its longstanding role as a safe and responsible operator.

Sincerely,



Len Clewett
Executive Vice President and Chief Nuclear Officer
Bruce Power