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Written submission from Ontario Power Generation

Mémoire de Ontario Power Generation

In the Matter of

À l'égard de

Request to extend filing deadline for documents related to the end of commercial operation for the Pickering Nuclear Generating Station Demande concernant le report de la date limite pour déposer les documents relatifs à la fin de l'exploitation commerciale de la centrale nucléaire de Pickering

Public Hearing - Hearing in writing based on written submissions

Audience Publique - Audience fondée sur des mémoires

December 2022

Décembre 2022





1675 Montgomery Park Road, P.O. Box 160, Pickering, Ontario L1V 2R5

October 5, 2022

CD# P-CORR-00531-23042

MR. DENIS SAUMURE

Registrar Commission Registry

Canadian Nuclear Safety Commission 280 Slater Street Ottawa, Ontario K1P 5S9

Dear Mr. Saumure,

Pickering NGS – Request to Extend Deadline Under PROL 48.01/2028 Licence Conditions 15.1 and 15.4 Related to the End of Commercial Operation

The purpose of this letter is to request extension of the deadline specified under PROL 48.01/2028 Licence Conditions 15.1 and 15.4 to extend the end of commercial operation. Based on the announcement made by the Ontario Minister of Energy on September 29, 2022, OPG is requesting additional time to complete the re-assessment required to meet these Licence Conditions for operation of Units 5-8 into 2026.

OPG recognizes the regulatory requirements and expectations regarding the operation of the Pickering Nuclear Generating Station beyond December 31, 2024 as established in the Pickering Power Reactor Operating Licence, PROL 48.01/2028.

The requirements for operation of the Pickering NGS beyond this date were documented in the associated Record of Decision. Licence Conditions 15.1 and 15.4 include a requirement to notify the CNSC in writing of the intent to operate beyond 2024 and to re-assess the continued validity of the Periodic Safety Review (PSR) and provide the results to the CNSC staff, no later than December 31, 2022. Also, the application to operate Pickering beyond December 31, 2024, is due to the Commission by the end of 2022.

OPG is requesting to extend the deadline for the reassessment of the continued validity of the PSR results as well as the application deadline to June 30, 2023, with the intent to notify the CNSC of the final end of commercial operation dates of all Pickering units by December 31, 2022. These dates would change the date requirements of Licence Conditions 15.1 and 15.4, but sufficient time would remain to provide the information for a public hearing.

In Reference 1, OPG informed the CNSC of the intent to pursue approval for operation of Pickering units 5-8 beyond December 2024. OPG continues to

communicate with CNSC staff and engage staff in reviewing the deliverables under the re-assessment of the PSR, including the fitness for service of major components, such as fuel channels, to ensure that the PSR reassessment will be accepted.

OPG is requesting a response to this request to extend the due date for Licence Conditions 15.1 and 15.4 by October 30, 2022.

If you have any questions regarding this submission, please contact Sara Irvine, Director, Nuclear Regulatory Affairs at 289-314-3367.

Jon Franke Senior Vice President Pickering Nuclear

References:

1. OPG Letter, J. Franke to K. Campbell, "Pickering NGS- Intent to Pursue CNSC Authorization for Operation of Pickering Units 5-8 through December 2025", December 16, 2021, CD# P-CORR-00531-22820.