



**Written submission from
Ontario Power Generation**

**Mémoire d'
Ontario Power Generation**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022

March 25, 2022

Commission Registrar
Canadian Nuclear Safety Commission
280 Slater Street,
Ottawa, ON K1P 5S9
Email: intervention@cnsccsn.gc.ca

RE: Support of New Brunswick Power's Request to Renew the Power Reactor Operating Licence for the Point Lepreau Nuclear Generating Station

To the Commissioners,

Ontario Power Generation (OPG) wishes to intervene in writing to express support for New Brunswick (NB) Power's application to the Canadian Nuclear Safety Commission (CNSC) for a 25-year renewal of the Point Lepreau Nuclear Generating Station - Power Reactor Operating Licence.

OPG has worked collaboratively with NB Power's Point Lepreau staff, fostering advancements in safety culture, safety practices and innovation for over half a century of nuclear generation. Throughout our working history, OPG has provided operations support and staff when required, and has observed consistent adherence to safety and high quality of work at Point Lepreau. This observation is reinforced by Point Lepreau's year-over-year strong performance in all Safety and Control Areas, and the fact that their recent periodic safety review did not identify any major gaps between its current state and modern standards.

OPG has observed the safety culture at Point Lepreau through the services we have provided for outage inspection and maintenance work, which has recently been completed by Laurentis Energy Partners (formerly Canadian Nuclear Partners), an OPG subsidiary. Through these interactions, we have observed that Point Lepreau has a highly trained and qualified workforce of nuclear professionals who ensure that NB Power's top priority is the safety of employees, the public and the environment.

Organizations such as the CANDU Owners Group have facilitated joint activities and initiatives in areas such as nuclear safety, emergency preparedness, fire protection and plant security. Such collaboration among operators in the CANDU industry is considered best-practice among both nuclear and other industries, and reinforces that the industry considers every opportunity to ensure optimum safety performance.

OPG has confidence in the ongoing CNSC oversight and regulatory processes to ensure continued safe operations throughout the proposed 25-year licence term. Throughout the duration of the licence, NB Power will be required to demonstrate continued safe performance through routine inspections by on-site CNSC staff,

ongoing compliance with the verification criteria in their Licence Conditions handbook, through the annual CNSC Regulatory Oversight Report, regular Status Report updates and Periodic Safety Reviews requiring public commission meetings. The CNSC has multiple regulatory tools to use throughout any licence duration to ensure licensees remain compliant with their licence conditions. Updates to the station's Licence Conditions Handbook will ensure the most current codes and standards are reflected in the station's licencing basis. In compliance with CNSC regulations, Point Lepreau will be required to maintain its comprehensive programs of public information and disclosure to ensure continual engagement with its community.

The Canadian government is committed to meeting 2050 targets for reducing carbon emissions, and as stated by Natural Resources Canada, no credible path exists to a net-zero economy by 2050 without nuclear energy. In addition to generating safe, clean and reliable electricity, Point Lepreau's nuclear generation is nearly free of greenhouse gas emissions; making the continued generation of safe, reliable and clean nuclear power at Point Lepreau a key element to Canada's collective fight against climate change and global warming.

In conclusion, based on Point Lepreau's strong safety record and the fact that NB Power continues to demonstrate a sustained commitment to the highest standards of safety and quality performance, and considering the CNSC's strength as a regulator regardless of a licence duration, OPG supports a 25-year renewal of NB Power's Point Lepreau operating licence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Gregoris', with a stylized flourish at the end.

Steve Gregoris
Chief Nuclear Officer
Ontario Power Generation