



**Written submission from
BWXT Canada Ltd.**

**Mémoire de
BWXT Canada Ltd.**

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 28, 2022

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: cns.interventions.ccsn@canada.ca

Subject: Renewal of New Brunswick Power Corporation's Nuclear Power Reactor Operating Licence for the Point Lepreau Nuclear Generating Station - Ref. 2022-H-02

Dear President and Commission Members,

I am writing on behalf of BWXT Canada Ltd. (BWXT) to express our support for New Brunswick Power Corporation's (NB Power) application to the Canadian Nuclear Safety Commission (CNSC) to renew its Nuclear Power Reactor Operating Licence for the Point Lepreau Nuclear Generating Station (PLNGS) for a 25-year period.

BWXT is a longstanding and trusted global supplier of nuclear components, fuel, services and medicine and operates 10 locations across Canada with approximately 1500 skilled employees. BWXT has supplied engineering support, critical components and services to PLNGS since it commenced operations in 1983.

Demonstrated commitment to safe operations

BWXT has decades of direct, hands-on experience working within PLNGS alongside site leadership and can attest to NB Power's strong nuclear safety culture which is demonstrated by consecutive satisfactory ratings across all safety and control areas from 2016 through 2019, and the recent milestone reached of two million hours worked without a Loss Time Accident. These ratings are a testament to NB Power's commitment to safety which maintains the continued protection of the public, employees and the environment as a matter of priority. Further, NB Power's commitment to continuous improvement can be seen in its significant upgrades to the station's Emergency Management Facilities which were undertaken in the licence period. These investments in improved emergency response infrastructure and technological advancements reflect a nuclear operator that is committed to the long-term safety of the public, the environment and its employees.

Updated Environmental Risk Assessment Demonstrates Minimal Impact

In 2020, NB Power conducted an update of its Environmental Risk Assessment (ERA) which found that results were consistent with the previous risk assessments completed – showing minimal impacts. NB Power remains fully committed to the environment that surrounds the station which it further demonstrated by completing a thermal plume assessment in the licence period, which confirmed that no harmful impacts were discovered due to cooling water discharge from the plant.

Commitment to Community & Indigenous Engagement

NB Power has a very strong public information and Indigenous engagement program that ensures members of the public surrounding the station have regular access to timely information and opportunities to engage. NB Power is committed to transparency and inclusion as can see through its stakeholder consultations and communication activities, including its active Community Liaison Committee. NB Power takes very seriously its relationships with its Indigenous communities of interest which can be seen through its regularly occurring monthly meetings, information sessions and educational forums organized by the licensee. NB Power's commitment to meaningful engagement is supported by its Strategic Approach to First Nations Affairs which is built on three interdependent elements: engagement, education and employment. BWXT is pleased to see that NB Power is leading the way in its cultivation of a culture that values diversity, respect, recognition and inclusion.

BWXT has confidence in NB Power's commitment to long-term safe operations

With nearly four decades of working with and for NB Power, BWXT is confident that NB Power will continue to maintain the same high standards for safe operations that they have demonstrated consecutively over the years. BWXT is proud to be a long-term supplier to PLNGS, which continues to prioritize the safety of the public, the environment and its employees above all else. NB Power's safety performance and commitment to continuous improvement can be seen its consecutively satisfactory performance and for this reason, we support its application for licence renewal.

BWXT thanks the CNSC for this opportunity to intervene in writing.

Sincerely,

A handwritten signature in blue ink that reads "John MacQuarrie". The signature is written in a cursive, flowing style.

John MacQuarrie
President
BWXT Commercial Operations