



CMD 23-M27.19

Date: 2023-08-03

File / dossier : 6.02.04

Edocs pdf : 7100770

**Written submission from
Aecon Group Inc.**

**Mémoire de
Aecon Group Inc.**

Bruce Power

Bruce Power

**Bruce Power Mid-Term Update of
Licensed Activities**

**Rapport de mi-parcours au sujet
des activités autorisées de Bruce
Power**

Commission Meeting

Réunion de la Commission

September 20 and 21, 2023

Le 20 et 21 septembre 2023

August 1, 2023

Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 5S9
interventions@cnscccsn.gc.ca

Re: Intervention in support of Bruce Power's 10-Year Nuclear Power Reactor Operating Licence (Mid-Term Review)

Please accept this as Aecon's written submission expressing our ongoing support for Bruce Power's 10-year Nuclear Power Reactor Operating Licence mid-term review by the Canadian Nuclear Safety Commission (CNSC).

By way of background, as a national Canadian construction and infrastructure development company with over 11,000 employees, Aecon is a major nuclear constructor in the country. Aecon Nuclear, which employs approximately 3,500 skilled workers and staff, provides a full spectrum of Engineering, Procurement and Construction (EPC) services and continues to play a critical role in the ongoing success of the two largest nuclear refurbishment projects in Ontario – including the ongoing life extension program of 6 units at the Bruce Power Nuclear Generating Station, also known as the Major Component Replacement (MCR) Project. Aecon has a long-standing relationship with Bruce Power and is proud to be a part of the joint venture that recently completed refurbishment activities for Unit 6, including the removal and replacement of Fuel Channels, Feeders, and Steam Generators.

As part of this mid-term review, Aecon would like to reinforce and highlight our strong endorsement and support of Bruce Power's ongoing operations for the following reasons:

- Bruce Power understands the history, impact and responsibility of reconciliation with Indigenous Peoples and continues to lead and take meaningful action to collaboratively work with Indigenous communities through employment opportunities, business development, education, training, social responsibility, community support, sponsorship, and maximizing procurement with established Indigenous businesses to create partnerships that advance economic prosperity.
- Nuclear power provides safe, reliable, clean, and low-cost electricity, which is essential to Ontario and Canada's balanced energy mix.
- Nuclear power is vital to ensuring Canada meets its commitment to achieve net-zero emissions by 2050 and Bruce Power currently produces approximately 30 per cent of Ontario's electricity supply. Bruce Power has concurrently committed to achieve net-zero emissions from its site operations by 2027.
- Bruce Power's ongoing refurbishment is a critical foundation in preparing for the new large-scale nuclear build announced in July of 2023, for which Ontario is starting pre-development work with Bruce Power – a project that will help meet rising electricity demand with reliable, emission-free power.
- Bruce Power continues to exemplify its social responsibility, contributing over \$230 million in municipal tax revenue for local services, infrastructure and recreation programs, conducting business with over 480 suppliers, and employing 22,000 workers in direct and indirect high paying, specialized jobs.
- Bruce Power continues to be recognized as a leading organization for Workplace Equity, Diversity and Inclusion, as one of Canada's Top Employers for Young People (11 years consecutively) and has achieved a Gold Certification for CCAB Progressive Aboriginal Relations.
- Bruce Power is recognized as a leading provider of medical isotopes, including Cobalt-60, and Lutetium-177. These isotopes are used every day in the global fight against cancer, and to keep hospitals clean and safe, combat disease, and sterilize food against pathogens.
- Through ongoing training, community involvement and emergency preparedness simulations,

Bruce Power continues to showcase their ability to respond in an unlikely scenario of an emergency, coordinated with local authorities and the Provincial Nuclear Emergency Response Plan.

- Through ongoing operations, Bruce Power's continued focus on safety, operational excellence, environmental protection and stakeholder engagement have formed the pillars of a sustainable infrastructure project that will benefit future generations.

Furthermore, Aecon believes Bruce Power continues to demonstrate operational and social responsibility and leadership throughout ongoing operations, and as a valued client, we are certain this will continue throughout the remainder of the current licence term. Bruce Power is driven by its unwavering focus on plant, people, environmental and community safety – a culture that sets the highest standards for its supply chain, and partners such as Aecon are steadfast in their mutual commitment to putting safety first.

The nuclear industry forms the backbone of Ontario's energy mix. Embracing today's innovations and advancements supports the continued clean, reliable supply of low-cost nuclear electricity generation, which is vital to the electrification of both Ontario and Canada's economy and to achieving net-zero by 2050. The progress Bruce Power has made in the refurbishment program to date underscores their ability, and the strength of their supply chain partners.

Considering Bruce Power's proven track record of operating safely and planning, executing and delivering complex nuclear refurbishment work, on-schedule and on-budget, Aecon firmly supports Bruce Power's ongoing operations and requests that the CNSC continues to support the operating licence at the Bruce Power site.

Sincerely,



Greg Thede
Vice President, Nuclear Strategy, Business Development & Services
Aecon Group Inc.
gthede@aecon.com
519-239-3156

VANCOUVER

1055 Dunsmuir Street, Suite 2124
Vancouver, BC V7X 1G4

CALGARY

110 9th Avenue SW, Suite 300
Calgary, AB T2P 0T1

TORONTO

20 Carlson Court, Suite 105
Toronto, ON M9W 7K6

MONTREAL

2015, rue Peel, Bureau 600
Montreal, QC H3A 1T8