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**Written submission from  
CANDU Owners Group Inc.**

**Mémoire de  
CANDU Owners Group Inc.**

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Regulatory Oversight Report for  
Canadian Nuclear Power Generating  
Sites: 2022 and Mid-term update for  
Ontario Power Generation's Pickering  
Nuclear Generating Station

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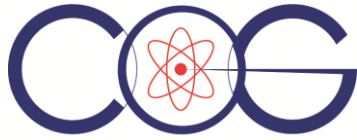
Rapport de surveillance réglementaire  
des sites de centrales nucléaires au  
Canada : 2022 et Rapport de mi-parcours  
d'Ontario Power Generation pour la  
centrale nucléaire de Pickering

Commission Meeting

Réunion de la Commission

**December 13 and 14, 2023**

**13 et 14 décembre 2023**



October 20, 2023

Attention: Senior Tribunal Officer, Registry

Canadian Nuclear Safety Commission  
280 Slater Street, P. O. Box 1046 Stn B  
Ottawa, ON K1P 5S9  
Email: [interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

**Subject: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for: 2022**

Dear Ms. Levert,

This submission is in support for the Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for the: 2022 outcomes.

The CANDU Owners Group (COG) has membership from all owners of CANDU reactors both in Canada and internationally. COG's vision is excellence through collaboration for CANDU and advanced nuclear technologies. Together with its members, suppliers, research and partner organizations, COG is continuously innovating nuclear plant equipment and processes to ensure the highest standard of safety, efficiency and environmental performance.

In order to fulfil this our mission, COG is organized around the following four operational program areas:

- Nuclear Safety and Environmental Affairs
- Research and Development
- Information Exchange and Knowledge Management
- Joint Projects

Bruce Power, Ontario Power Generation, and New Brunswick Power play a significant role by bringing expertise to the table, sharing experiences with others, and contributing to or playing a lead role in all of the program areas. Nuclear safety is a top priority for all of our members.

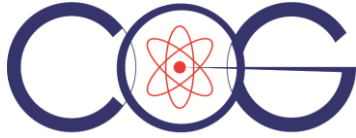
Key results which have been achieved and enhanced through full involvement of the Canadian nuclear utilities in collaboration via COG include:

Safety Analysis improvements:

- Aging Management assessments
- Probabilistic Safety Assessments
- Severe Accident studies and management
- Analysis of external hazards
- Modifications to plant and procedures to enhance safety

Numerous projects to ensure ongoing safe, long-term operation, including:

- Fuel Channel Life Management
- Research into pressure tube behaviour and longevity
- Optimization of plant processes through innovation and artificial intelligence (AI)
- Plant modernization
- Waste management and minimization



Through COG's network of peer teams, CANDU owners' staff collaborate to address aspects of plant safety and operations, including key areas of Human Performance, Equipment Reliability, and Radiation Protection. By sharing experiences and working on common approaches, the CANDU owners are able to benefit one another, the international members, and new emerging nuclear utilities. The CANDU Owners are also leveraging their over 40 years of knowledge towards deployment of advanced technologies and SMRs to ensure safe, reliable, and clean electricity is available worldwide.

In addition to their commitment to nuclear safety, the CANDU owners are committed to training and development of their staff. The utilities participate annually in the COG Nuclear Professional Development Seminar (NPDS) by sending staff that are moving into or have just entered into leadership roles within the industry. This is a 3-week intensive course covering topics like safety culture, strategic thinking, and leadership traits.

On an international front, the CANDU owners have made significant contributions to reference documents and standards of the International Atomic Energy Agency (IAEA), especially in response to the Fukushima event and nuclear safety. This includes response to loss of electrical power events, plant equipment design and modifications to enhance safety, and aging management approaches for PHWRs.

As a result of the ongoing collaboration and commitment to continuous improvement by the CANDU owners, COG is supportive of the CNSC staff's conclusion that the nuclear power plants (NPPs) and waste management facilities (WFMs) operating on their sites in Canada operated safely in 2022.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rachna Clavero', with a long horizontal flourish extending to the right.

Rachna Clavero  
President and CEO  
CANDU Owners Group

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