



**Written submission from
Kinectrics**

**Mémoire de
Kinectrics**

In the Matter of

À l'égard d'

Ontario Power Generation

Ontario Power Generation

Ontario Power Generation – Licence amendment application for the Darlington Nuclear Generating Station regarding the commercial production of Cobalt-60

Ontario Power Generation – Demande concernant la modification de son permis pour la centrale nucléaire de Darlington en vue de produire commercialement du Cobalt-60

Public Hearing – Hearing in writing based on written submissions

Audience publique – Audience fondée sur des mémoires

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Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario
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Hearing in Writing on Ontario Power Generation's Licence Amendment Application for the Darlington Nuclear Generating Station Regarding the Commercial Production of Cobalt-60

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' support for Ontario Power Generation's (OPG's) application to amend the Darlington Nuclear Generating Station (NGS) Power Reactor Operating Licence (PROL) 13.03/2025 to add, as a new activity, Cobalt-60 (Co-60) radioisotope production through the irradiation of Cobalt-59 (Co-59) adjuster absorber rods in all four of Darlington NGS's reactors in partnership with Nordion Canada Inc.

Kinectrics is a proudly Canadian company committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters are in Etobicoke, Ontario with offices in Pickering, downtown Toronto, Bruce County, the United States, Germany, Denmark, Romania, the United Kingdom and India. We operate over 30 laboratories including CNSC-licensed nuclear facilities and employ more than 1,300 staff, 70% of whom have technical, science or engineering degrees.

Kinectrics has made significant investments in the production of medical isotopes and we share OPG's vision of the importance of providing medical isotopes for therapeutic treatments and equipment sterilization. OPG has been producing the Co-60 radioisotope in Pickering NGS's reactors for decades, providing a significant portion of worldwide production (15-20%). The Co-60 Production Modifications Project at Darlington NGS provides an opportunity for OPG and Canada to maintain a long-term supply of Co-60 and continue to be a major contributor of the radioisotope with significant health, safety and social benefits. Kinectrics believes that it is important to continue to invest in Canadian-based technologies that will maintain Canada's prominence in medical isotope production, and that it is our responsibility to ensure that these isotopes are available in Canada and throughout the world for protecting the health of patients.



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Kinectrics provides a broad range of services to OPG which contribute to continued safe operations of the OPG stations. Specific to the Co-60 Production Modifications Project, Kinectrics performed safety analysis to demonstrate that applicable regulatory dose limits will be met with Co-60 rods stored in the Irradiated Fuel Bay.

In providing these services to OPG, Kinectrics' staff interfaced with OPG staff where we have developed long-standing working relationships. With our extensive experience working closely with OPG, we can attest that OPG's effective management of their facilities provides a safe work environment and we have confidence in their commitment to produce, possess, manage, package and transfer the Co-60 radioisotope safely and reliably at Darlington NGS.

Kinectrics is a proud member of the Canadian Council for Aboriginal Business (CCAB), which aims to strengthen the relationship between Aboriginal and non-Aboriginal peoples, businesses, and communities. In this regard, we are pleased to work with OPG, which is also a member of the CCAB and has demonstrated a strong commitment to work towards meaningful engagement with Indigenous peoples and to further Indigenous business involvement in the supply chain. OPG created an Indigenous Opportunities Network (ION) designed to increase the number of Indigenous people working in the nuclear industry by placing them in the building trades on some of OPG's most diverse and innovative projects. OPG also prepared a Reconciliation Action Plan, which functions as a road map for OPG to work in partnership with Indigenous communities, businesses, and organizations to advance reconciliation, and OPG has made meaningful progress on the plan. Kinectrics shares OPG's views in this pursuit and is actively working with Indigenous businesses and Indigenous communities in the regions in which we operate.

In summary, by working closely with OPG over many years and understanding their people, programs, procedures, processes, and safety culture, Kinectrics has observed the commitment to safety and attention to detail which are applied to all OPG projects. Based on these experiences, Kinectrics is confident that OPG is capable of possessing, managing, packaging, and transferring Co-60 at Darlington NGS.

On this basis, we support OPG's application to amend the Darlington NGS PROL to allow for the production of Co-60 in all four of Darlington NGS's reactors. If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or david.harris@kinectrics.com.

Sincerely,

David Harris
President and CEO
Kinectrics Inc.