



**Written submission from the
Organization of Canadian
Nuclear Industries**

**Mémoire de
l'Organization of Canadian
Nuclear Industries**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Application to extend the operation of
Pickering Nuclear Generating Station
Units 5 to 8 until December 31, 2026

Demande visant à prolonger l'exploitation
des tranches 5 à 8 de la centrale nucléaire de
Pickering jusqu'au 31 décembre 2026

Commission Public Hearing

Audience publique de la Commission

June 2024

Juin 2024

April 19, 2024

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 5S9
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Public Hearing Ref. 2024-H-05

Dear Senior Tribunal Officer,

On behalf of the Organization of Canadian Nuclear Industries (OCNI), I would like to express my support for Ontario Power Generation's (OPG) application to extend the operation of Pickering Nuclear Generating Station (NGS) Units 5 to 8 until December 31, 2026.

The Organization of Canadian Nuclear Industries (OCNI) is an association of more than 250 leading Canadian suppliers to the nuclear industry in Canada and abroad. OCNI member companies collectively employ over 15,000 highly skilled and specialized people who manufacture major equipment and components, provide engineering services, and support the 19 operating CANDU nuclear power plants in Canada. OCNI companies also work on medical and other applications of nuclear technology.

OCNI member companies provide a wide variety of equipment and services to Pickering NGS. All suppliers who work for OPG must be on an Approved Supplier List (ASL) and must demonstrate they meet strict requirements for Quality Assurance Programs such as ISO-9001 or Z299/N299. OPG follows industry best practices in conducting supplier audits or in using the results of NUPIC and CANPAC audits of OPG suppliers. I am therefore confident that all work done by suppliers for the OPG Pickering NGS Units 5 to 8 meets the highest standards of quality.

OCNI strongly supports the continued operation of Pickering Nuclear Generating Station's Units 5 to 8 until the end of 2026, recognizing its vital role in delivering clean, safe, and reliable low-cost electricity. The benefits of sustaining these units are extensive, not only for Ontario's power needs but also for the environment and the local economy. Extending the operation of Pickering NGS will significantly reduce CO2 emissions by 2.1 megatonnes in 2026 alone, which is the equivalent of removing up to 643,000 cars from the roads. This action directly contributes to the fight against climate change and supports environmental sustainability.

Moreover, maintaining these operations will preserve approximately 4,500 skilled jobs for another two years, bolstering the local economy and securing livelihoods. This extension is also crucial for the healthcare sector, as Pickering NGS is responsible for producing 20% of North America's and 10% of the world's supply of Cobalt-60, a critical medical isotope used in life-saving treatments.

At OCNI, we fully support OPG's unwavering commitment to safety, which remains their highest priority until the final day of operations. Impressively, throughout its 50 years, there has never been an incident of public harm due to radiation emissions from its nuclear power plants or waste storage facilities.

In recent years, Pickering Nuclear has consistently demonstrated its operational excellence. For instance, in 2022, all six units operated continuously for 109 straight days—a new record for the station. Furthermore, in 2020, Unit 4 of Pickering achieved a remarkable 730 consecutive days of operation. These achievements underscore the facility's reliability, reinforcing our support for the proposed extension of Units 5 to 8 until 2026.

Safety is also one of OPG's top priority, and OCNI is confident that OPG does everything protect the public, its staff, and the environment by adhering to stringent standards and regulations. Recent updates in OPG's safety analysis, known as the PSR2-B, affirm that Pickering NGS Units 5 to 8 can safely continue operations until the end of December 2026.

Noteably, OPG is dedicated to fostering strong, mutually beneficial relationships with Indigenous communities near its operational sites, grounded in respect for their culture, customs, and rights. Engagement efforts include regular meetings with Williams Treaties First Nations, the Mohawks of the Bay of Quinte, and the Metis Nation of Ontario, focusing on environmental performance, career fairs, site tours, and supporting community events. Additionally, OPG maintains frequent discussions with Indigenous representatives to share information and collaborate on development projects, underpinned by formal Agreements that facilitate consistent and meaningful engagement. In October 2021, OPG introduced its first Reconciliation Action Plan, which sets specific commitments and timelines for advancing reconciliation through procurement, employment, environmental stewardship, and relationship-building, achieving notable successes such as exceeding spending and hiring targets with Indigenous partners.

As you know, nuclear power is crucial in combating climate change, offering safe, reliable, and carbon-free high-volume power production, contributing to Ontario's status as one of the world's least carbon-intensive regions. OPG prioritizes environmental and public safety, maintaining a rigorous environmental monitoring program that tracks water, air, and soil quality, with results publicly available to ensure community assurance of safety. Furthermore, OPG actively promotes environmental sustainability and community engagement in Pickering and Ajax, earning the gold standard Wildlife Habitat Council certification for its efforts in biodiversity, including local tree planting and educational family activities.

As Ontario undertakes the refurbishment of Darlington and Bruce Power's units, the continued functioning of Pickering is indispensable. It ensures a stable supply of baseload power, which is essential for the province during this transitional period. By supporting the extension of operations at Pickering NGS Unites 5 to 8, OCNI, a trusted leading voice in the nuclear industry, is advocating for a strategic approach that maximizes existing resources to deliver substantial economic, environmental, and health benefits.

Yours sincerely,



Bill Walker
President and CEO