



CMD 26-H103.10

Date: 2026-08-19

**Written Submission from the
Saugeen Ojibway Nation**

**Mémoire de la
Nation Saugeen Ojibway**

In the matter of

À l'égard du

Bruce Power

Application to amend the licensing basis for Bruce A and B nuclear generating stations to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours

Bruce Power

Demande visant à modifier le fondement d'autorisation des centrales nucléaires de Bruce-A et B afin d'exploiter les tubes de force des tranches 7 et 8 au-delà des 300 000 heures équivalentes pleine puissance

Hearing in Writing

Audience par écrit

August 2026

Août 2026



The Joint Chiefs and Councils
of the Saugeen Ojibway Nation

August 18, 2026

Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 1C2

Re: Bruce Power's application to amend the licensing basis for Bruce B nuclear generating station to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours

Pursuant to rule 19 of the *Canadian Nuclear Safety Commission Rules of Procedure*,¹ the Saugeen Ojibway Nation ("SON") requests the opportunity to intervene in the public hearing before the Canadian Nuclear Safety Commission (the "Commission" when referring to the tribunal; "CNSC" when referring to the organization) on Bruce Power's application to amend the licensing basis for the Bruce B nuclear generating station to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours ("EFPH") ("Application").

In its Application, Bruce Power seeks Commission approval to operate Bruce B Units 7 and 8 up to 310,000 EFPH. Bruce Power states that this increase is required "to optimize the overall Major Component Replacement ("MCR") schedule."² Said another way, Bruce B Units 7 and 8 are projected to exceed their current licensed limit before the MCR outages occur.³ The proposed 310,000 EFPH value will provide Bruce Power with "the regulatory certainty and operational margin needed to ensure safe execution of these large refurbishment projects."⁴

SON previously understood that the pressure tubes in Bruce B Units 7 and 8 were expected to operate to 210,000 EFPH, which "is roughly equivalent to 30 years of operation at a capacity factor of 80 percent."⁵ Since 2014, however, Bruce Power has repeatedly sought Commission approval to extend that operational lifespan by an additional 100,000 EFPH.⁶ Bruce Power's requested extension to 310,000 EFPH in this Application represents the latest in a series of incremental life extensions to these aging components. While each application has been presented as limited in scope, the cumulative effect is to authorize operation significantly beyond the operating life that was originally contemplated for these components.

¹ SOR/2000-211.

² Bruce Power, "[Application to amend the licensing basis for Bruce B nuclear generating station to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours](#)" (26 September 2025) at 1 [Bruce Power Application].

³ Bruce Power Application at 3.

⁴ Bruce Power Application at 1.

⁵ CNSC Staff, "[CMD 26-103: Bruce B Units 7 and 8: Request to Extend Operation up to 310,000 Equivalent Full Power Hours](#)" (25 June 2026) at 5 [CNSC Staff Submission].

⁶ CNSC Staff Submission at 5.

Each incremental extension warrants thorough consideration by the Commission, both on its own merits and in considering its cumulative effects.

Bruce Power asserts that this extended lifespan does “not have an impact on health (*sic*), safety, security, the environment and Canada’s international obligations.”⁷ The Commission must carefully examine this conclusion. SON generally agrees with the Canadian Environmental Law Association (“CELA”) that “there are health and safety concerns...that arise from operating Units 7 and 8 pressure tubes beyond 300,000 EFPH, and in the interest of complying with section 24(4) of the [*Nuclear Safety and Control Act*], the Commission must carefully scrutinize the risks associated with this [A]pplication” for the reasons set out in CELA’s intervention.⁸ SON has also previously raised questions and concern regarding the application of safety analyses (including deteriorating deterministic and probabilistic safety analyses margins with extended life) by CNSC staff regarding the operation of the pressure tubes beyond 300,000 EFPH.⁹

In light of the foregoing, the Commission must be wholly satisfied that it has sufficient information to credibly assess the health and safety risks associated with extending the operating life of the pressure tubes beyond 300,000 EFPH before arriving at a decision on the Application. This is particularly important given that the primary rationale Bruce Power has advanced for the extension is to accommodate scheduling objectives associated with the MCR program. Should the Commission authorize the proposed extension, the Commission must clearly demonstrate to SON that it will not pose a risk to the health and safety of SON Members and SON Territory for the sake of operational convenience, including to address scheduling pressures created by the timing of Bruce Power’s MCR program.

SON Members must be able to have confidence in the safety of the facility and in the rigor, transparency, and effectiveness of the regulatory oversight that governs its operation. Should the Commission approve the Application, its reasons should clearly explain how it satisfied itself that operation beyond 300,000 EFPH can be conducted with adequate margins of safety and why the evidence before it supports that conclusion. Consideration should also be given to providing SON and its Members with opportunities to engage directly with CNSC staff regarding the Commission’s decision, the underlying safety case, and the regulatory oversight that will continue to apply. The Commission’s role is not only to ensure safety, but also to foster confidence that it has done so.

SON also notes that this Application does not arise in isolation. Rather, it stands alongside several other applications through which Bruce Power has sought to extend and expand its operations in SON Territory, including increases in spent nuclear fuel.¹⁰ While SON does not oppose the Application if an adequate

⁷ Bruce Power Application at 1.

⁸ CELA, “[Submission of the Canadian Environmental Law Association reviewing Bruce Power’s application to amend its licensing basis for Bruce A and B nuclear generating stations to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours \(EFPH\) \(Ref. 2026-H-103\)](#)” (5 August 2026) at 5-6.

⁹ CNSC Staff Submission at 18-19.

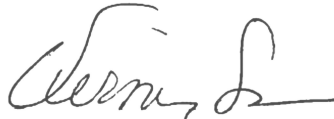
¹⁰ For instance, Bruce Power continues to pursue significant refurbishment activities to extend the operational life of its Bruce A and B facilities through the MCR project, has recently applied to increase reactor power operating limits at both facilities, and is currently pursuing ambitious timelines, in collaboration with the CNSC and the Impact Assessment Agency of Canada, to advance its proposed Bruce C nuclear project through the federal impact

safety case is established, SON has consistently raised concerns in other proceedings before the Commission regarding the growing and effectively open-ended nuclear footprint in SON Territory. SON therefore highlights, once again, the importance of the Commission addressing those broader concerns in a meaningful manner as it considers the cumulative implications of ongoing operational extensions, refurbishments, and expansion proposals.

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Chief Conrad Ritchie
Saugeen First Nation

A handwritten signature in dark ink, featuring a large, stylized 'V' and 'S'.

Chief Veronica Smith
Chippewas of Nawash Unceded First Nation

assessment process. Each of these extensions and expansions stands to further intensify the adverse impacts on SON, including through additional discharge of thermal effluent into Lake Huron and the generation and storage of additional nuclear waste in SON Territory.