



CMD 26-H103.9

Date: 2026-08-06

**Written Submission from
Women in Nuclear (WiN) Canada**

**Mémoire de
Women in Nuclear (WiN) Canada**

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



August 05, 2026

Canadian Nuclear Safety Commission
c/o Registry
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

RE: Support from Women in Nuclear Canada for Bruce Power's application to amend the licensing basis for Bruce B nuclear generating stations to operate Units 7 and 8 pressure tubes beyond 300,000 effective full power hours

Women in Nuclear (WiN) Canada is a national not-for-profit organization representing more than 7,000 professionals working across Canada's nuclear and radioactive waste materials sectors. WiN Canada is dedicated to advancing gender equality, diversity, and inclusion, while supporting the safe, sustainable, and socially responsible development of nuclear projects that contribute positively to communities and Canada's clean energy future.

Bruce Power is seeking Commission approval to amend the licensing basis for the Bruce B nuclear generating stations to permit operation of the pressure tubes in Units 7 and 8 beyond the current limit of 300,000 effective full power hours (EFPH).

- Current licensing limits authorize operation of pressure tubes at Bruce B up to a maximum of 300,000 EFPH.
- Bruce Power is requesting Commission approval to permit operation of Units 7 and 8 up to a maximum of 310,000 EFPH after demonstrating that fuel channel fitness-for-service requirements and safety margins can continue to be maintained.

The requested amendment would support Bruce Power's Life Extension Program and the Major Component Replacement projects for Units 7 and 8. The additional operating margin would provide flexibility to accommodate potential changes in refurbishment schedules and support the safe execution of these large-scale projects.

Bruce Power has a strong track record of operating safely. In the CNSC's Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024, CNSC staff verified and confirmed the safe operation of nuclear power plants and associated facilities and rated Bruce Power's performance as satisfactory across all Safety and Control Areas.

With respect to Bruce B, CNSC staff concluded that Bruce Power met applicable regulatory requirements in Radiation Protection, including that radiation doses to workers remained below regulatory limits and that measures continued to be implemented to keep exposures as low as



reasonably achievable (ALARA). CNSC staff also concluded that Bruce Power met regulatory requirements in Conventional Health and Safety, noting prompt correction of procedural non-compliances and appropriate follow-up on reportable events with corrective actions.

The current application is supported by a detailed technical assessment of fuel channel condition and the degradation mechanisms associated with extended operation. Bruce Power concluded that the existing Fuel Channel Fitness-for-Service Program can continue to support operation of Units 7 and 8 up to 310,000 EFPH. The assessment found that existing programs, including inspections, surveillance activities, engineering assessments, and research and development initiatives, remain effective in managing the conditions associated with extended fuel channel operation.

Taken together, these oversight findings and technical assessments support the view that Bruce Power has the governance, operational programs, technical expertise, and safety culture necessary to manage long-term operation and refurbishment activities while continuing to operate within a robust regulatory framework.

From a rights-holder and stakeholder relations standpoint, CNSC reporting includes positive observations about Bruce Power's engagement practices. The CNSC notes that Bruce Power met and shared information with interested Indigenous communities and organizations in 2024, and that CNSC staff continued to be satisfied with engagement efforts while encouraging early involvement in decision-making.

Environmental protection is another area in which Bruce Power has demonstrated strong performance. In the CNSC's Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024, Environmental Protection was rated satisfactory and CNSC staff concluded that Bruce Power met applicable regulatory requirements. CNSC staff reported that public dose from the Bruce site remained below the regulatory limit and that releases of radiological nuclear substances remained well below derived release limits. CNSC staff also noted that Bruce Power has implemented and continues to maintain an environmental management system in accordance with CNSC requirements.

Bruce Power's public reporting further notes that the organization has maintained alignment with the ISO 14001 Environmental Management Systems standard for 19 years and successfully completed a surveillance audit in 2024. Bruce Power also continues to implement environmental protection programs and standards required under its operating license. These long-standing programs, together with the CNSC's satisfactory findings in environmental protection, demonstrate a disciplined approach to environmental stewardship and provide confidence in Bruce Power's ability to continue operating its facilities responsibly.

Particularly of interest to WiN Canada, Bruce Power plays a critical role in supporting a strong, diverse, and future-ready workforce. It aligns with WiN Canada's mission to create pathways for women in STEM, fostering innovation through diversity.

Bruce Power's public sustainability reporting emphasizes that Diversity, Equity, and Inclusion (DE&I) are positioned as an organizational priority and connected to performance excellence and innovation. Importantly, the same reporting provides at least one quantified indicator: in 2023, 32% of people hired into permanent roles were women (alongside other representation metrics for permanent hires).

The metric above indicates meaningful progress in women's recruitment into permanent roles, which is a foundational input into long-term representation gains. However, WiN Canada notes the poor representation of women on the Bruce Power senior management team. At the time of writing of this letter (July 2026), there was only one woman out of eight on the executive team, and only two out of ten on the Board of Directors.

WiN Canada therefore notes areas for improvement in increasing women representation at the senior leadership and board levels at Bruce Power. We also recommend increasing reporting metrics to that effect in its sustainability report; while it provides hiring indicators, extending that transparency to leadership/board representation would strengthen accountability.

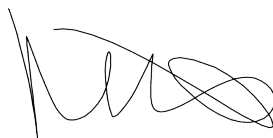
Based on the information supporting this request, together with Bruce Power's demonstrated commitment to operational safety, successful project execution, environmental stewardship, stakeholder engagement, and workforce development, WiN Canada supports the Commission's consideration of Bruce Power's requested licensing basis amendment to permit operation of Units 7 and 8 pressure tubes beyond 300,000 EFPH to a maximum of 310,000 EFPH.

This support is offered with the expectation that Bruce Power will continue to maintain strong performance transparency, including clear reporting and targeted improvement in DE&I outcomes and women's representation at leadership and governance levels.

Sincerely,



Priya Malik
Vice President
Women in Nuclear Canada



Maude-Emilie Pagé
Director, Regulatory & Policy
Women in Nuclear Canada