



CMD 26-H104.12

Date: 2026-05-07

**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 increase reactor power limits

Bruce Power

Demande visant à modifier le fondement d'autorisation des centrales nucléaires de Bruce-A et B afin d'augmenter les limites de puissance des réacteurs

Hearing in Writing

Audience par écrit

July 2026

Juillet 2026



May 6, 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 A and B nuclear generating stations to increase reactor power limits

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 materials sectors. WiN Canada is dedicated to advancing gender equity, 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 power limits at Bruce A and Bruce B, to enable additional recovery of reactor power.

- Current licensing basis power limits authorize Bruce A to operate up to 92.5%FP and Bruce B to operate up to 93%FP.
- Bruce Power is requesting from the Commission approval to operate at 95.5%FP and 96%FP at Bruce A and B respectively, after demonstrating safety margins are maintained at these levels.

Dubbed 'Project 2030', Bruce Power's efforts to achieve this objective will add the equivalent of one new large-scale reactor's output to the current Bruce Power site, without the need to build additional infrastructure. This is enough additional electricity to power more than 900,000 in Ontario through Bruce Power's reliable, non-greenhouse gas emitting nuclear generation. Project 2030 is also expected to increase Bruce Power's production capacity for cancer-fighting medical isotopes produced at the site.

Bruce Power has a strong track record of operating safely. In the CNSC's own Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024, CNSC staff state that they verified and confirmed safe operation of nuclear power plants and associated facilities in 2024, and that safety performance was rated "satisfactory" across safety and control areas.

With respect to Bruce A and B, CNSC staff concluded, for example, that Bruce Power met applicable regulatory requirements in Radiation Protection, including that radiation doses to workers were below regulatory dose limits and that appropriate measures were used to keep doses ALARA. CNSC staff also concluded Bruce Power met regulatory requirements in



Conventional Health and Safety, noting prompt correction of procedural non-compliances and follow-up on reportable events with appropriate corrective actions.

With respect to Project 2030, the submission by CNSC staff notes specifically that, while related submissions are under regulatory review, no major issues have been identified (based on current review status). Taken together, these oversight findings support the view that Bruce Power has the governance, programs, and performance culture needed to pursue incremental uprates within a robust regulatory framework.

It should be furthermore noted that Bruce Power has a demonstrated strong track record in environmental protection. Again in the Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024, CNSC staff rated Bruce Power's Environmental Protection performance as "satisfactory" and determined—based on quarterly and annual reporting assessments—that Bruce Power met regulatory requirements under relevant CNSC regulatory documents. CNSC staff reported that dose to the public from the Bruce site (1.1 $\mu\text{Sv}/\text{year}$) remained below the regulatory limit (1 mSv/year), and that releases of radiological nuclear substances were well below derived release limits in 2024. CNSC staff also note that Bruce Power has implemented and continues to maintain a corporate environmental management system in accordance with CNSC requirements.

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.

Particularly of interest to WiN Canada, Bruce Power plays a critical role in supporting a strong, diverse, and future-ready nuclear 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 to 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 (April 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 CNSC's oversight findings showing satisfactory performance and compliance with regulatory expectations, together with evidence of structured environmental protection and continuous improvement practices, WiN Canada supports the Commission's consideration of Bruce Power's requested licensing basis amendment to increase reactor power limits.

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

Sincerely,

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