



CMD 26-H104.6

Date: 2026-05-05

**Written Submission from the
Canadian Nuclear Isotope Council**

**Mémoire du
Conseil canadien des isotopes
nucléaires**

In the matter of

À l'égard du

Bruce Power

Bruce Power

Application to amend the licensing basis
for Bruce A and B nuclear generating
stations to increase reactor power limits

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

Members of the Commission
BP-CORR-00531-09959
Ms. Candace Salmon,
Commission Registrar
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

April 24, 2026

Re: Bruce Power's application to increase reactor power limits at Bruce A and B Nuclear Generating Stations under Project 2030.

Dear Members of the Commission,

On behalf of the Canadian Nuclear Isotope Council (CNIC), I am writing to express the organization's support for Bruce Power's application to amend the licensing basis for Bruce A and Bruce B Nuclear Generating Stations to increase the reactor, channel, and bundle power limits as part of Project 2030. In particular, the CNIC supports the requested authorization to move to intermediate power levels at Bruce A and Bruce B as a staged and carefully regulated step in support of Ontario's future clean energy needs.

The CNIC is an independent, not-for-profit organization representing over 120 members across Canada's healthcare, nuclear, research, and academic sectors. Since its establishment, the CNIC has worked to safeguard Canada's global leadership in isotope production, nuclear innovation, and the broader ecosystem that supports patient care, scientific advancement, and national resilience. The CNIC also advocates for sustainable, research-based, and risk-informed policies that enable Canada's nuclear isotope sector to continue delivering strategic value domestically and internationally.

As outlined in Bruce Power's CNSC submission, Project 2030 is intended to support Ontario's climate goals and future clean energy needs by targeting a site capability of 7,000 megawatts by the early 2030s. The requested increases will authorize the intermediate power levels to reach 95.5% at Bruce A and 96.0% at Bruce B, enabling Bruce Power to achieve its Project 2030 goals.

Bruce Power is one of Canada's most important nuclear assets, and its role extends beyond electricity generation. Through production and harvesting capabilities in the Bruce B reactors, Bruce Power has become a key part of Canada's medical isotope ecosystem, including as a leader in the production of Cobalt-60 (Co-60) and Lutetium-177 (Lu-177), which support medical device sterilization and life-changing cancer therapy. Bruce

Power's irradiation capabilities are a critical piece of Canada's broader radiopharmaceutical supply chain, as well as applications in agriculture, industry, and more. Bruce Power's operations contribute to Canada's current leadership position in the international isotope industry, including enabling Canada to produce more than half the global supply of Co-60 and over 70% of the Lu-177 required to produce Pluvicto, a revolutionary drug to treat prostate cancer.

The Project 2030 plan recognizes that the recovery of reactor power to the proposed intermediate levels has the potential to impact future Co-60 harvests and Lu-177 production, with associated program and procedure updates to be managed within the existing regulatory framework. The CNSC has previously recognized Bruce Power's mature Co-60 and Lu-177 production program that is able to accommodate the proposed changes, with revised procedures completed prior to implementation.¹ In this respect, Bruce Power contributes to two national public-interest objectives at once: reliable, low-carbon electricity supply and the simultaneous continued strength of a domestic isotope production system that remains critical to Canadian and international health systems.

The CNIC recognizes that Bruce Power has advanced this application with a clear intention of maintaining the established safety basis for its operations. As presented, the proposed increase is intended to be implemented within the existing regulatory framework, and in a manner that preserves the protections in place for all stakeholders involved. In that regard, Bruce Power's submission states that no new radionuclides and no changes to derived release limits or environmental action levels are anticipated as a result of the proposed change in power limits. It is also worth noting that Project 2030 is intended to advance objectives that align with Ontario's long-term energy plans and broader priorities. The proposed license amendment builds on the refurbishment of Units 1 and 2, the Major Component Replacement program for Units 3 through 8, lifetime asset management planning, and other initiatives intended to extend unit life. Importantly, these life extension efforts will also secure critical isotope production into the future, supporting long-term security of supply and predictability for the isotope supply chain in Canada. Maintaining strong and modern generators will help sustain the long-term conditions under which Canada's isotope ecosystem can continue to grow and evolve, while maintaining a leadership role internationally.

Bruce Power's continued strength has significance beyond electricity generation. Its role in Ontario's nuclear sector helps sustain the foundation that supports isotope production in Canada. Continued progress under Project 2030 therefore matters not only for energy

¹ https://api.cnscccsn.gc.ca/dms/digital-medias/CMD26-H104-CNSC-SUB.pdf/object?utm_source

planning, but also for the long-term resilience of the broader nuclear and isotope ecosystem.

For these reasons, the CNIC strongly supports Bruce Power's application to amend the licensing basis for Bruce A and Bruce B Nuclear Generating Stations to increase reactor power limits to the proposed intermediate levels under Project 2030. The CNIC appreciates the Commission's time and careful consideration of this submission.

Sincerely,

A handwritten signature in black ink that reads "MAGreaves". The letters are cursive and fluid, with the first name "Melody" and last name "Greaves" written in a single continuous line.

Melody Greaves

Executive Director, VP Government Relations
Canadian Nuclear Isotope Council
