



CMD 26-H7.11

Date: 2026-07-23

**Written Submission from
BWXT Canada Ltd.**

**Mémoire de
BWXT Canada Ltd.**

In the matter of

À l'égard de

Ontario Power Generation

Application to refurbish Pickering Nuclear
Generating Station and to renew licences
for the Pickering Nuclear Generating
Station and Waste Management Facility

Ontario Power Generation

Demande concernant la réfection de la
centrale nucléaire de Pickering et le
renouvellement de ses permis pour la
centrale et l'installation de gestion des
déchets

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

October 2026

Octobre 2026



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July 23, 2026

Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario
K1P 5S9

Intervention in Support of Ontario Power Generation's Application for Renewal of the Pickering Nuclear Generating Station Power Reactor Operating Licence

Dear Commission Secretariat,

On behalf of BWXT Canada Ltd., I am pleased to provide this written intervention in support of Ontario Power Generation's (OPG's) application to renew the Power Reactor Operating Licence for the Pickering Nuclear Generating Station (PNGS) for the period of January 1, 2027 to December 31, 2036, including OPG's request to consolidate the licensed activities of the Pickering Waste Facility Operating Licence into a single, integrated licence.

As a long-standing Canadian nuclear manufacturer, fuel supplier and field services provider headquartered in Cambridge, Ontario, BWXT Canada is an integral part of the province's nuclear supply chain. We proudly support the safe, reliable, and cost-effective operation of nuclear facilities that are essential to Ontario's electricity system. We recognize and respect the Canadian Nuclear Safety Commission's (CNSC's) mandate to ensure the protection of people and the environment, and we offer this intervention to assist the Commission in its review of OPG's application.

OPG's safe operation of the PNGS over several decades reflects a strong organizational culture grounded in nuclear professionalism, rigorous adherence to regulatory requirements and continuous improvement. The station has demonstrated a strong commitment to radiological safety by consistently keeping radiation exposure below 1% of the regulatory public dose limit. Additionally, OPG has a long record of recognition for excellence in conventional safety. This underlines the company's sustained commitment to protecting workers, communities and the environment.

The Pickering Waste Management Facility, which is essential for the safe interim storage of used fuel and intermediate-level materials, has operated for more than 30 years without a Lost Time Accident. Likewise, its ongoing storage, transfer and processing of used fuel through Dry Storage Containers holds a strong record of safety and environmental stewardship, conducting more than 1,400 transfers without incident. These achievements are important indicators of OPG's capability to safely manage nuclear materials throughout the lifecycle of its operations.

Looking forward, OPG's planned refurbishment of Units 5 to 8 represents a significant opportunity to secure more than 2,100 MW of clean, reliable power for Ontario for an additional 30-plus years. This work will help maintain electricity system stability while supporting Ontario's broader economic development, energy security and climate objectives. The Independent Electricity System Operator's forecast of a 75% increase in electricity demand by 2050 underscores how vital this project is to meet the province's needs.



BWXT Canada is directly supporting OPG's life-extension project in Pickering by supplying 48 new steam generators to enable the refurbishment of Units 5 to 8. This work will create hundreds of highly skilled trades and technical jobs in Cambridge, Ontario and the surrounding region and will help sustain a strong, competitive domestic nuclear supply chain.

OPG's approach to refurbishment benefits from its experience executing the Darlington refurbishment program, in which BWXT played a major role. That refurbishment was completed four months ahead of schedule and \$150 million under budget, all while maintaining OPG's strong record of safety compliance and quality control. That approach and experience is further strengthened by the application of Periodic Safety Review 3 (PSR3). The PSR3 process will ensure that safety enhancements are systematically identified, implemented and reviewed with CNSC staff before any refurbished unit returns to service. This methodical, transparent approach aligns with international best practices and reflects OPG's commitment to maintaining the highest standards of nuclear safety.

In parallel, OPG has continued to demonstrate leadership in public engagement, Indigenous relations and reconciliation. The company's Reconciliation Action Plan includes sustained investment in Indigenous initiatives and strengthened framework agreements with Indigenous Nations and communities. Taken together, these measures support meaningful participation, open communication and respect for Indigenous rights and interests. They also help to build public confidence that the proposed licensed activities will continue to be managed responsibly and inclusively.

OPG's request to consolidate the current Power Reactor Operating Licence and the Pickering Waste Facility Operating Licence is a practical measure that supports streamlined oversight, provides an integrated understanding of generation and waste management activities, and reflects feedback from past intervenors. We support this approach because it enables regulatory clarity while maintaining the CNSC's comprehensive and robust oversight.

In summary, based on OPG's demonstrated safety performance, its methodical approach to refurbishment planning, its comprehensive waste management practices, its sustained engagement with Indigenous communities and the public, as well as the essential role that the refurbished Pickering units will play in supporting Ontario's electricity needs, BWXT Canada fully supports OPG's application for a renewed and consolidated licence through 2036.

We respectfully submit that OPG is fully qualified to carry out the activities under the requested licence. For decades, the PNGS has safely and reliably provided electricity for millions of Ontarians. The workers who have devoted themselves to the station's operations have been extremely dedicated and committed to meeting the CNSC's rigorous safety requirements and standards.

Thank you for the opportunity to provide this intervention. BWXT Canada appreciates the Commission's thorough and transparent review process and remains committed to supporting the safe and successful execution of the Pickering refurbishment program.

Sincerely,

A handwritten signature in blue ink that reads "John MacQuarrie". The signature is fluid and cursive, with the first name "John" being more prominent.

John MacQuarrie
President, BWXT Canada Ltd.