



CMD 26-H7.14

Date: 2026-07-28

**Written Submission from
Black & McDonald Ltd.**

**Mémoire de
Black & McDonald 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



575 Granite Court, Pickering, ON. L1W 3K1 (905) 837-1291

July 28, 2026

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, ON
K1P 5S9

To Whom It May Concern,

On behalf of Black & McDonald Limited, I am writing to express our full support for Ontario Power Generation's (OPG) application to renew the Power Reactor Operating License (PROL) for the Pickering Nuclear Generating Station (PNGS) for the period of January 1, 2027, to December 31, 2036.

As a long-standing engineering, procurement, and construction (EPC) services partner to OPG, we have had the privilege of working closely with the Pickering Nuclear Generating Station for more than 25 years. Throughout that time, we have witnessed firsthand OPG's unwavering commitment to safety, operational excellence, environmental stewardship, and regulatory compliance. The strong safety culture demonstrated by OPG and its workforce has been foundational to the station's success and its continued ability to safely deliver reliable electricity to Ontario.

Located in Pickering, Ontario, just east of Toronto, PNGS is one of the largest nuclear generating stations in the world. The station's four operating CANDU® (CANadian Deuterium Uranium) reactors currently provide approximately 10 percent of Ontario's electricity needs, supplying safe, reliable, and virtually emissions-free power to millions of Ontarians. For decades, PNGS has been a cornerstone of Ontario's electricity system, helping to ensure energy reliability while supporting the province's climate objectives and economic growth.

The proposed license renewal is a critical step in ensuring the continued operation of this important asset and maintaining a stable supply of low-carbon electricity as demand increases due to population growth, electrification initiatives, and industrial development. The station's continued operation will remain essential to Ontario's energy security and long-term electricity planning.



We strongly support OPG's proposed refurbishment of Units 5 through 8, which will enable the station to continue providing a significant portion of Ontario's electricity supply for an additional 30 years or more. This major infrastructure investment will secure more than 2,100 MW of clean, reliable generating capacity, enough to safely and reliably power approximately two million homes and businesses across Ontario.

Beyond its energy contributions, the refurbishment project will deliver substantial economic benefits across the province and throughout Canada. The project will maintain and secure thousands of highly skilled jobs within OPG, its contractor community, and the broader Canadian nuclear supply chain. It is also expected to generate significant economic activity, contributing an estimated \$38.2 billion to Ontario's GDP over the life of the project, including approximately \$17 billion during the refurbishment phase alone. As an organization that has supported Ontario's nuclear industry for decades, we recognize the critical importance of these long-term investments in sustaining Canada's nuclear expertise, workforce development, and domestic supply chain capabilities.

We also appreciate OPG's commitment to meaningful engagement with Indigenous communities throughout the regulatory process. The Pickering Nuclear Generating Station and the Pickering Waste Management Facility are located on the treaty and traditional territory of the Michi Saagiig and Chippewa Nations, collectively known as the Williams Treaties First Nations. Ongoing engagement with Indigenous communities helps ensure that Indigenous perspectives, rights, interests, and knowledge are considered in matters relating to station operations, refurbishment activities, environmental stewardship, waste management, and future decommissioning activities. These efforts contribute to transparency, collaboration, and reconciliation.

We support OPG's proposal to continue decommissioning activities for Units 1 through 4 in accordance with the Canadian Nuclear Safety Commission's approved Detailed Decommissioning Plan. OPG's commitment to conducting these activities under robust regulatory oversight demonstrates a responsible approach to safety, environmental protection, and long-term stewardship.

We also support the continued operation of the Pickering Waste Management Facility (PWMF), which is located on the PNGS site and safely stores used fuel bundles from Pickering as well as intermediate-level waste materials generated from past reactor work. The facility has maintained an exceptional safety record, operating for more than three decades without a Lost Time Accident. This track record reflects the effectiveness of OPG's safety programs, operating procedures, and commitment to protecting workers, the public, and the environment.

Furthermore, we support the proposed consolidation of the activities currently authorized under the Pickering Waste Facility Operating License with those authorized under the Power Reactor Operating License. A consolidated licensing framework would provide a more CNSC's and comprehensive view of site activities while maintaining the CNSC's rigorous regulatory oversight. We believe this approach will enhance efficiency, transparency, and clarity for regulators, Indigenous communities, stakeholders, and the public.

For decades, the Pickering Nuclear Generating Station has safely and reliably powered the lives of millions of Ontarians. The men and women dedicated to the station's operation have consistently demonstrated professionalism, technical excellence, and a steadfast commitment to meeting stringent safety requirements and standards under the ongoing oversight of onsite CNSC staff. Canada's nuclear industry has established a strong reputation for safety, regulatory compliance, and environmental responsibility, and PNGS continues to exemplify these principles.

Based on our longstanding experience working alongside OPG, we are confident in the organization's ability to continue meeting its regulatory obligations and maintaining the highest standards of safety and environmental performance throughout the proposed license period. For these reasons, Black & McDonald Limited respectfully encourages the Commission to approve OPG's application to renew the Pickering Nuclear Generating Station Power Reactor Operating License and authorize the associated activities outlined in the application. Doing so will support Ontario's energy security, economic prosperity, clean energy goals, and the continued supply of safe, reliable, and virtually emissions-free electricity for generations to come.

Thank you for considering this intervention.

Sincerely,
BLACK & McDONALD LIMITED



Andrew Dow
Senior Director Operations