



**CMD 26-H7.34**

Date: 2026-08-12

**Written Submission from the  
Power Workers' Union**

**Mémoire de  
Power Workers' Union**

In the matter of

À l'égard de

**Ontario Power Generation**

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

**Ontario Power Generation**

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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

August 12, 2026

**By Electronic Submission**

Executive Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario K1P 5S9

**Re: Intervention of the Power Workers' Union**

**Ontario Power Generation - Application to Refurbish the Pickering Nuclear Generating Station and Renew the Licences for the Pickering Nuclear Generating Station and the Pickering Waste Management Facility**

The Power Workers' Union (PWU) has a direct and substantial interest in this matter. The PWU represents thousands of skilled workers across Ontario's electricity sector, including workers involved in nuclear generation and the operation, maintenance and support of nuclear facilities.

The Commission's consideration of the continued operation, refurbishment and licensing of nuclear facilities has direct implications for PWU members, their workplaces and communities, and Ontario's electricity system. The PWU therefore has a strong interest in ensuring that the Commission considers the workforce perspective when assessing the safe and reliable long-term operation of these facilities.

Through its members, the PWU brings extensive practical experience and institutional knowledge concerning nuclear operations, maintenance, radiation protection, skilled trades, training, apprenticeship, workplace health and safety, and workforce requirements associated with major electricity infrastructure.

The PWU can provide insight into the importance of a highly trained and experienced nuclear workforce, workforce planning and knowledge transfer, development of the next generation of skilled workers, and the employment, supply-chain and economic benefits of long-term nuclear operations and refurbishment. This perspective complements that of the applicant, government, regulators and other industry stakeholders.

An oral submission would allow the PWU to provide practical context on workforce considerations, including the relationship between a stable, experienced and appropriately trained workforce and safe nuclear operations. It would also allow the

PWU to address training, apprenticeship, succession planning, knowledge transfer, workplace safety, and the availability of skilled workers to support major nuclear projects while maintaining Ontario's existing electricity infrastructure.

Oral participation would further allow the PWU to respond directly to matters raised during the hearing and answer Commission questions based on the practical experience of its members. This would provide the Commission with a workforce perspective that complements the technical, regulatory and corporate evidence before it and supports a more complete understanding of the matters under review.

The PWU has not received participant funding to prepare or present its submission to the Commission.

## **POWER WORKERS' UNION**

# POWER WORKERS' UNION

244 Eglinton Avenue East | Toronto, Ontario M4P 1K2

August 12, 2026

## By Electronic Submission

Executive Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario K1P 5S9

### Re: Intervention of the Power Workers' Union

### **Ontario Power Generation - Application to Refurbish the Pickering Nuclear Generating Station and Renew the Licences for the Pickering Nuclear Generating Station and the Pickering Waste Management Facility**

Dear Commission Members:

The Power Workers' Union ("PWU") appreciates the opportunity to intervene in support of Ontario Power Generation Inc.'s ("OPG") application to refurbish the Pickering Nuclear Generating Station ("PNGS") and renew the licences for the Pickering Nuclear Generating Station and the Pickering Waste Management Facility.

The PWU represents approximately 18,000 workers employed throughout Ontario's electricity sector, including thousands of highly skilled employees working in nuclear generation, including operations, maintenance, electrical, mechanical, clerical, security, radiation protection, fuel and waste management, and other technical professions. For more than half a century, our members have safely operated, maintained, and modernized Ontario's nuclear fleet. Their expertise has helped establish Ontario as a global leader in the safe and reliable operation of nuclear facilities.

The PWU respectfully submits that approval of OPG's application is firmly in the public interest. The proposed refurbishment will preserve a critical component of Ontario's electricity system while generating significant economic, employment, workforce development, and community benefits. It will strengthen Ontario's long-term energy security, reinforce Canada's world-class nuclear supply chain, support the continued development of highly skilled workers, and ensure that future generations continue to benefit from a reliable source of low-carbon electricity.

### **The Public Interest Supports Approval**

Ontario is entering a period of unprecedented electricity demand growth driven by electrification, population growth, advanced manufacturing, critical minerals development, data centres, housing growth, and broader economic expansion. The challenge facing Ontario is not whether electricity demand will increase, but whether sufficient reliable generation can be developed in time to meet that demand while maintaining affordability, system reliability, and economic competitiveness.

Meeting this demand will require a diverse, reliable, and resilient electricity system anchored by baseload generation that can be relied on to produce electricity regardless of weather conditions

or time of day. Nuclear generation remains uniquely positioned to provide the large-scale, low-carbon electricity needed to support Ontario's economic growth while maintaining grid reliability.

The refurbishment of Pickering Nuclear Generating Station represents a prudent investment in an existing strategic public asset. Extending the operating life of the station will enable the continued generation of more than 2,000 MW of reliable, low-carbon baseload electricity for another 30 years while making effective use of existing infrastructure, transmission assets, and an experienced workforce.

Maintaining this strategically located generating capacity will improve Ontario's long-term energy security, reduce reliance on more carbon-intensive alternatives, and help support a stable, affordable, and reliable electricity system in Ontario.

## **Economic Benefits Across Ontario**

The Pickering refurbishment represents one of the most significant infrastructure investments currently planned within Ontario's electricity sector.

The economic benefits extend well beyond the station itself.

The project will sustain and create thousands of good-paying, highly-skilled jobs in plant operations, maintenance and administration while generating thousands of additional employment opportunities in engineering, construction, manufacturing, and numerous other supporting industries throughout the project. These are family-supporting careers that contribute to local communities through increased household income, municipal revenues, and long-term business investment.

Equally important, the project will generate economic activity across Ontario through the participation of hundreds of companies that manufacture specialized nuclear components, provide engineering expertise, fabricate equipment, and deliver highly technical services.

The Pickering refurbishment represents investment in Ontario workers, Ontario businesses, and Ontario communities.

## **Preserving and Developing a World-Class Workforce**

Ontario's nuclear industry has been built upon generations of highly trained and experienced workers.

As experienced employees retire, major refurbishment projects provide an essential opportunity to recruit, train, and develop the next generation of skilled tradespeople, engineers, operators, radiation protection professionals, maintenance specialists, and technical experts.

The Pickering refurbishment will create meaningful apprenticeship opportunities while facilitating the transfer of invaluable institutional knowledge from experienced workers to younger employees entering the industry.

Maintaining this skilled workforce is essential not only for Pickering, but for the continued success of Ontario's broader nuclear program, including future refurbishment projects, new large-scale nuclear generation, and small modular reactor development.

Pickering refurbishment will also provide critical project continuity across Ontario's nuclear industry. Sustained refurbishment activity allows employers to retain highly specialized workers whose knowledge and experience have been developed over decades. Gaps between major projects risk the loss of unique skills through retirement, migration, and workforce attrition.

Maintaining continuity between refurbishment and future nuclear projects will help ensure Ontario retains the expertise necessary to support the next generation of nuclear development.

### **Proven Experience Delivering Nuclear Refurbishments**

Ontario's nuclear industry has successfully completed major refurbishment projects at both Darlington and Bruce Power Units 3, 4 & 6, that have extended the life of critical generating assets while supporting thousands of skilled jobs.

These projects have demonstrated Ontario's ability to plan, execute, and safely deliver large-scale nuclear infrastructure programs. The same workforce, supply chain partners, and institutional expertise that contributed to those successes will support the proposed refurbishment at Pickering.

The Pickering project benefits from lessons learned through decades of successful nuclear operations and refurbishment work, reducing project risk while strengthening confidence in Ontario's ability to deliver another successful refurbishment project safely and effectively.

### **Strengthening Canada's Nuclear Supply Chain**

Ontario possesses one of the world's most advanced nuclear supply chains.

The proposed refurbishment will provide the long-term certainty needed for Canadian manufacturers, engineering firms, fabricators, and specialized service providers to continue investing in facilities, equipment, innovation, and workforce development.

The refurbishment will reinforce a largely domestic nuclear supply chain comprised of hundreds of Ontario and Canadian companies. These firms provide engineering services, advanced manufacturing, specialized fabrication, construction support, and technical expertise that would be difficult to replace if lost. Long-term project certainty encourages continued investment and positions Canadian companies to compete successfully for opportunities in the growing global nuclear market.

A strong domestic nuclear supply chain enhances Canada's economic resilience while preserving the industrial capability required to support critical infrastructure over the long term.

### **Supporting Ontario's Long-Term Nuclear Strategy**

The refurbishment of Pickering should not be viewed in isolation. It forms part of a broader strategy to ensure Ontario has sufficient reliable, low-carbon electricity to support economic growth and electrification over the coming decades.

Maintaining Pickering's workforce and supply chain capacity will help support future nuclear initiatives, including additional large-scale nuclear generation, future refurbishment projects across Ontario's existing fleet, and the deployment of emerging technologies such as small modular reactors.

The project therefore contributes not only to current system reliability but also to the long-term sustainability and competitiveness of Canada's nuclear industry.

### **Supporting Local Communities**

For decades, Pickering Nuclear Generating Station has served as an economic anchor for Durham Region and surrounding communities.

Beyond direct employment, the station supports local businesses, municipal services, educational institutions, charitable organizations, and numerous community partnerships.

Refurbishment will provide continued economic stability for thousands of families while ensuring that future generations continue to benefit from high-quality employment opportunities and sustained community investment.

### **Environmental Stewardship and Responsible Investment**

Extending the operating life of an existing nuclear generating station represents one of the most effective means of preserving large-scale, reliable, low-carbon electricity generation while maximizing the value of existing generating station properties and public infrastructure.

The refurbishment will enable Ontario to meet increasing electricity demand while reducing reliance on more carbon-intensive sources of generation and avoiding unnecessary duplication of existing transmission and supporting infrastructure.

The project also reflects responsible stewardship of a strategic public asset that can continue to operate safely under the Commission's rigorous regulatory oversight for another 30 years.

### **Confidence in Canada's Nuclear Regulatory Framework**

The Power Worker's Union has long recognized the Canadian Nuclear Safety Commission as one of the world's leading independent nuclear regulators.

Our members work within this regulatory framework every day and understand that an unrelenting focus on safety is the foundation upon which every aspect of nuclear operations is built.

The PWU is confident that OPG possesses the technical expertise, operational experience, and organizational capability necessary to undertake the proposed refurbishment safely and in full compliance with the Commission's regulatory requirements.

The PWU likewise supports the continued licensing of the Pickering Waste Management Facility, recognizing that OPG's impeccable record of safe management of used fuel and radioactive wastes will continue to be essential components of the Pickering Station's responsibilities for decades to come.

### **Conclusion**

Ontario's future prosperity depends upon access to safe, reliable, affordable, and low-carbon electricity. As electricity demand continues to accelerate, preserving existing nuclear generation while preparing for future nuclear development is essential to maintaining reliability, supporting economic growth, and ensuring Ontario remains competitive. The refurbishment of Pickering Nuclear Generating Station represents a strategic investment in the infrastructure, workforce, and supply chains required to achieve those objectives.

The proposed refurbishment will strengthen Ontario's long-term energy security, preserve reliable low-carbon electricity generation, sustain thousands of good-paying jobs, support apprenticeships and workforce renewal, reinforce Canada's world-class nuclear supply chain, generate substantial economic benefits across Ontario, and continue supporting the communities that have hosted this facility for generations.

For these reasons, PWU respectfully submits that the Commission should approve OPG's application to refurbish the Pickering Nuclear Generating Station and renew the licences for the Pickering Nuclear Generating Station and the Pickering Waste Management Facility.

Respectfully submitted,

**POWER WORKERS' UNION**

## **List of PWU Employers**

Alectra Utilities (formerly PowerStream)  
Algoma Power  
Aptum Technologies (formerly Cogeco Peer 1)  
Atlantic Power Corporation - Calstock Power Plant  
Atlantic Power Corporation - Kapuskasing Power Plant  
Atlantic Power Corporation - Nipigon Power Plant  
Atura - Brighton Beach Power  
Atura – Halton Hills Generating Station  
Atura – Napanee Generating Station  
Atura - Portlands Energy  
Bracebridge Generation  
Brant County Municipality  
Brookfield Power Wind Operations  
Bruce Power Inc.  
Canadian Nuclear Laboratories (AECL Chalk River)  
Capital Power East Windsor  
Capital Power Goreway  
CC Nuclear (formerly Abraflex)  
Centre Wellington Hydro  
Compass Group (Bruce, Darlington, Pickering, PLC/Brock Rd.)  
Cornwall Electric  
Elexicon (formerly Whitby Hydro)  
Enova (formerly Kitchener-Wilmot & Waterloo North)  
Enwave Windsor  
EPCOR Darlington Demineralized Water Plant  
EPCOR Electricity Distribution Inc.  
ERTH Power Corporation (formerly Erie Thames Powerlines)  
ERTH Holdings Inc.  
Electrical Safety Authority  
eStructure  
Ethos Energy Ltd.  
Great Lakes Power (Generation)  
Greater Sudbury Hydro  
Greenfield South Power Corporation  
Grimsby Power Incorporated  
Halton Hills Hydro Inc.  
Hydro One Inc.  
Hydro One CSO (formerly Inergi)  
Independent Electricity System Operator  
InnPower (Innisfil Hydro Distribution Systems Limited)  
Kinectrics Inc.  
Lakeland Power Distribution  
Laurentis Energy Partners  
London Hydro Corporation  
Milton Hydro Distribution Inc.  
Mississagi Power Trust  
NAES  
Newmarket Tay Power Distribution  
North Bay Hydro  
Northern Ontario Wires  
Nuclear Waste Management Organization  
Ontario Power Generation Inc.  
Orangeville Hydro  
PUC Services  
Quality Tree Service  
Reworld Durham York Limited Partnership (Formerly Covanta Durham York Renewable Energy)

Rogers Communications (Kincardine Cable TV Ltd.)  
Sioux Lookout Hydro Inc.  
SouthWestern Energy  
Synergy North (formerly Kenora Hydro Electric Corporation Ltd.)  
The Town of Tillsonburg  
Toronto Hydro  
TransAlta Generation Partnership O.H.S.C.  
Westario Power