



CMD 26-H7.46

Date: 2026-08-12

**Written Submission from
Bruce Power**

**Mémoire de
Bruce Power**

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

August 12, 2026

BP-CORR-00531-07803

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St
PO Box 1046 Stn. B
Ottawa ON K1P 5S9

Dear Members of the Commission,

RE: Ontario Power Generation –
Pickering Nuclear Generating Station and Waste Management Facility

Bruce Power is an electricity company based in Bruce County, Ontario. Our employees are proud of the role they play in safely delivering clean, reliable, nuclear power to Ontario families and businesses while supplying cancer-fighting medical isotopes used around the world.

Bruce Power strongly supports Ontario Power Generation (OPG)'s application to renew and consolidate the licences for the Pickering Nuclear Generating Station (NGS) and the Pickering Waste Management Facility (PWMF), and to authorize the refurbishment and continued operation of Units 5 to 8. OPG is requesting a ten-year licence term from January 1, 2027, to December 31, 2036, that would support refurbishment activities, continued operation of the facility, ongoing waste management activities, and the decommissioning preparations for Units 1 to 4. The application has been comprehensively reviewed by CNSC staff, who have concluded that OPG remains qualified to carry on the licensed activities and will continue to make adequate provision for the protection of the environment, the health and safety of persons, national security, and Canada's international obligations.

This letter focuses on two critical areas: operational safety and Indigenous engagement.

Operational Safety

The Pickering Nuclear Generating Station has demonstrated a longstanding commitment to safe and reliable operation. CNSC staff have concluded that OPG's programs and processes continue to meet regulatory requirements and support the safe conduct of licensed activities throughout operation, refurbishment, waste management, and future decommissioning activities.

1. *Safety and Control Areas* – CNSC staff assessments found that OPG's programs remain effective across the Safety and Control Areas that govern nuclear operations, including management systems, human performance management, operating performance, safety analysis, physical design, fitness for service, radiation protection, conventional health and safety, environmental protection, emergency management, waste management, security, safeguards, and transportation. CNSC staff concluded

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that OPG remains qualified to safely undertake the activities proposed under the renewed licence.

2. *Periodic Safety Review and Refurbishment Readiness* – A comprehensive Periodic Safety Review (PSR3) is in progress in accordance with CNSC requirements and international best practices. The review is examining fifteen safety factors and concluded that there are no fundamental safety issues that would prevent continued safe operation and refurbishment of Units 5 to 8. OPG's planned Global Assessment Report and Integrated Implementation Plan will further enhance safety through the implementation of modernization initiatives and Safety Improvement Opportunities. The refurbishment program itself reflects lessons learned from major Canadian nuclear refurbishment projects, including Darlington. Planned upgrades include replacement of fuel channels, feeders and steam generators, improvements to emergency and safety systems, modernization of control systems, enhanced external hazard protection measures, and construction of a Deep-Water Intake system designed to improve long-term operational resilience and efficiency. These investments will support more than 30 additional years of safe operation following refurbishment.
3. *Environmental Protection and Radiation Safety* – Environmental assessments completed in support of the application concluded that the continued operation, refurbishment, and associated activities can be undertaken safely with appropriate mitigation measures. Public radiation doses remain only a fraction of regulatory limits, and CNSC staff concluded that OPG's environmental protection and radiation protection programs remain effective. Human and ecological doses are predicted to remain well below regulatory criteria, and no significant adverse environmental effects are anticipated.
In addition, Pickering NGS continues to play an important role in Ontario's clean energy future. Units 5 to 8 provide approximately 2,100 MW of generating capacity and currently supply approximately 10 percent of Ontario's electricity needs while supporting provincial decarbonization objectives and energy security.

Indigenous Engagement

Bruce Power recognizes that meaningful engagement with Indigenous Nations and communities is essential to the responsible development and operation of nuclear facilities. The documentation supporting the Pickering licence renewal demonstrates OPG's ongoing engagement with Indigenous Nations and communities and its efforts to maintain opportunities for dialogue, participation and relationship-building throughout the licensing process. OPG has maintained regular engagement tables, environmental and waste management discussions, capacity funding arrangements, technical workshops, and consultation activities relating to refurbishment, continued operations, decommissioning planning, and environmental assessments.

We note OPG's continued efforts to advance its Reconciliation Action Plan and to create opportunities for Indigenous participation in environmental monitoring, archaeological assessments, workforce development, procurement activities, and long-term planning. OPG reports that since 2022 it has awarded substantial Indigenous procurement opportunities and maintained ongoing relationships with rights-holding communities and interested Indigenous organizations.

Bruce Power recognizes that meaningful engagement with Indigenous Nations and communities remains an important element of major nuclear licensing decisions and respects the perspectives that Indigenous Nations may bring to the Commission's consideration of this application.

Conclusion

The comprehensive reviews conducted by OPG and CNSC staff support the conclusion that the station can continue to operate safely while undertaking the proposed refurbishment program and associated activities.

The Pickering Nuclear Generating Station and Waste Management Facility have a proven track record of safe operation, robust regulatory compliance, and continuous improvement. The refurbishment and continued operation of Pickering Units 5 to 8 will contribute significantly to Ontario's long-term electricity system by providing reliable, low-carbon electricity while supporting economic development, nuclear innovation, and Canada's leadership in the nuclear sector.

The renewal of a consolidated Power Reactor Operating Licence for an additional 10 years for the Pickering Nuclear Generating Station and Waste Management Facility, will enable OPG to continue providing safe, reliable, and low-carbon electricity to Ontario while fostering positive relationships with Indigenous communities.

For these reasons, Bruce Power respectfully supports OPG's application and encourages the Commission to approve the requested licence renewal and associated authorizations.

Thank you for considering our support for this important licence renewal for OPG and the nuclear industry in advancing Ontario's clean energy future.

Sincerely,

Michael Rinker

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Vice President,
Regulatory, Environment & Sustainability
Bruce Power