



CMD 26-H7.48

Date: 2026-08-14

**Written Submission from
Women in Nuclear (WiN) Canada**

**Mémoire de
Women in Nuclear (WiN) Canada**

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 13, 2026

Canadian Nuclear Safety Commission
c/o Registry
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

RE: Support from Women in Nuclear Canada for Ontario Power Generation to refurbish Pickering Nuclear Generating Station and to renew licenses for the Pickering Nuclear Generating Station and Waste Management Facility

Women in Nuclear (WiN) Canada is a national not-for-profit organization representing more than 7,000 professionals working across Canada's nuclear and radioactive materials sectors. WiN Canada is dedicated to advancing gender equity, diversity, and inclusion, while supporting the safe, sustainable, and socially responsible development of nuclear projects that contribute positively to communities and Canada's clean energy future.

Ontario Power Generation (OPG) is seeking Commission approval to renew the operating licenses for both the Pickering Nuclear Generating Station (PNGS) and the Pickering Waste Management Facility (PWMF), as well as authorization to refurbish units 5 to 8 at the PNGS.

- Current licences for the PNGS and PWMF remain valid until August 31, 2028. OPG is requesting an early 10-year licence renewal, from January 01, 2027, to December 31, 2036, to support the station's long-term operating and refurbishment plans.
- OPG is also requesting Commission approval to consolidate activities currently authorized under separate licenses into a single license, and to refurbish Pickering Units 5 to 8. The units are currently authorized to operate until December 31, 2026, and refurbishment would support their continued operation for decades to come.

The proposed refurbishment would enable PNGS to continue providing reliable, low-carbon electricity to Ontario for decades to come. By extending the life of Units 5 to 8, the project would preserve more than 2,100 MW of generating capacity, enough to power approximately two million homes and businesses across the province. The project is expected to support thousands of highly skilled jobs, strengthen Canada's nuclear supply chain, and generate significant economic benefits across Ontario while helping meet growing electricity demand and support the province's clean energy goals.

OPG has a strong track record of safe and responsible operation. In the CNSC's own Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2023, both the PNGS and the PWMF received satisfactory ratings across all Safety and Control Areas.

With respect to operational safety, CNSC staff concluded that radiation doses to workers remained below regulatory limits and that measures continued to be implemented to keep exposures as low as reasonably achievable. CNSC staff also confirmed that OPG maintained sufficient qualified personnel to safely operate the station and that workers possessed the knowledge and skills required to perform their duties safely and competently.

In the area of Conventional Health and Safety, CNSC staff concluded that OPG met regulatory requirements and noted that non-compliances identified through inspections were promptly addressed and resolved to the satisfaction of the CNSC staff.

The Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2023 also provides insight into OPG's preparation for extended operation and future refurbishment activities. As part of its application to continue operating Pickering Units 5 to 8 until December 31, 2026, OPG completed a reassessment of its Periodic Safety Review (PSR) to evaluate the impact of the extended operating period and determine whether additional safety improvements were required. OPG subsequently updated its Integrated Implementation Plan (IIP), which was accepted by CNSC staff in July 2023. CNSC staff noted that commitments were being completed according to plan and stated that they were satisfied with OPG's progress.

Taken together, these oversight findings support the view that OPG has the governance, operational programs, technical expertise, and organizational capacity necessary to safely undertake refurbishment of Pickering Units 5 to 8 while continuing to operate both PNGS and PWMF in accordance with regulatory expectations.

It should be furthermore noted that OPG has demonstrated a strong track record in environmental protection. Again, in the Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2023, CNSC staff rated OPG's Environmental Protection satisfactory at both the PNGS and the PWMF. CNSC staff determined that OPG met applicable regulatory requirements. CNSC staff reported that public dose from the OPG site remained below the regulatory limit (1 mSv per year), that the releases of radiological nuclear substances remained well below derived release limits. CNSC staff further concluded that OPG had made adequate provision for the protection of people and the environment surrounding the Pickering site.

These conclusions are consistent with the CNSC's Environmental Protection Review (2024) for the PNGS, which found that OPG continues to maintain effective environmental protection measures and that potential environmental and human health risks associated with Pickering operations are low to negligible. CNSC staff further concluded that environmental releases from the site are at levels comparable to natural background conditions and that the health of people living near the site remains protected. These findings support the view that OPG has effective environmental protection programs in place and continues to operate both PNGS and PWMF in a manner that protects both people and the environment.



WiN Canada also recognizes OPG as a leader in advancing the participation and visibility of women in the nuclear sector.

OPG's 2024 public sustainability reporting emphasizes that Diversity, Equity and Inclusion (DE&I) is an organizational priority and highlights the important role that diverse perspectives play in driving performance, innovation, and long-term success. Importantly, OPG's commitment is reflected not only in its policies, but also in measurable outcomes.

According to this same report, women represented 55% of the company's executive team. Further, OPG's 2023 Integrated ESG and Annual Report noted that women comprised 60% of independent directors, 50% of corporate officers, and 53.8% of the Enterprise Leadership Team, while the Board of Directors was more than 50% gender diverse. These results are exceptional within both the nuclear and broader energy sectors and demonstrate a sustained commitment to advancing women into senior leadership and governance positions.

The strong representation of women across OPG's executive leadership and Board of Directors positions the organization as a leading example within Canada's nuclear industry. WiN Canada commends OPG for its leadership in this area and for demonstrating how diversity and inclusion can be embedded within governance and decision-making structures.

Based on the CNSC's oversight findings showing satisfactory performance and compliance with regulatory expectations at both the PNGS and PWMF, together with evidence of effective environmental protection, stakeholder engagement, and workforce development practices, WiN Canada supports the Commission's consideration of OPG's application to refurbish the PNGS and renew the operating licences for the PNGS and PWMF.

WiN Canada respectfully requests the opportunity to participate in the hearing as an intervenor and to provide an oral presentation in support of this written submission.

Sincerely,



Priya Malik
Vice President
Women in Nuclear Canada



Maude-Emilie Pagé
Director, Regulatory & Policy
Women in Nuclear Canada

