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Written submission from Laveer Engineering

Mémoire de Laveer Engineering

In the Matter of

Bruce Power Inc. – Bruce A and B Nuclear Generating Station

Request for a ten-year renewal of its Nuclear Power Reactor Operating Licence for the Bruce A and B Nuclear Generating Station

Commission Public Hearing – Part 2

May 28-31, 2018

À l'égard de

Bruce Power Inc. - Centrale nucléaire de Bruce A et Bruce B

Demande de renouvellement, pour une période de dix ans, de son permis d'exploitation d'un réacteur nucléaire de puissance à la centrale nucléaire de Bruce A et Bruce B

Audience publique de la Commission – Partie 2

28-31 mai 2018

Canada

Canadian Nuclear Safety Commission
280 Slater St., P.O. Box 1046, Station B
Ottawa, ON
K1P 5S9

RE: Support for Bruce Power's 10 year Licence Renewal from Laveer Engineering

Laveer Engineering is an organization of engineers that has committed itself almost entirely to activities at CANDU nuclear power stations. Through the engineering and outage organizations, Laveer has supplied innovative inspection and maintenance tooling, supported process development for large maintenance campaigns and provides equipment expertise to outage campaigns. Each time that staff are engaged at the stations or with Bruce Power staff in any way, we are reminded of the high quality organization Bruce Power has become. Safety is always the number 1 priority and this is not just a platitude – it is expressed by everyone and seen in their actions. The cleanliness of the plants and the continual commitment to human performance make this obvious each time you participate in any activities at Bruce Power. These facts make work at Bruce Power a positive experience for all involved and makes staff at Laveer eager to take on future work with Bruce Power.

Bruce Power's statement of "Innovation at Work" is justified. The staff and management are actively pursuing opportunities to do things differently and it's an admirable quality in this industry. The work always builds on operating experience (OPEX) but continually seeks to provide a better outcome than previously (e.g., better, faster, cheaper). This should not be misinterpreted as cutting corners – the goal is always to do the right amount of work and Bruce Power has put processes in place to support proper definition of the rigour required to support activities like design. The evolution of this process ensure costs are reflective of the complexity and criticality of tasks being performed and the potential consequences of an error. This provides immense value to Bruce Power as well as vendors since it greatly increases the likelihood of a successful outcome (including being on time and on budget).

Through work with Bruce Power, Laveer has been given opportunities to participate in incredible projects that have brought value to Bruce Power and Laveer through appropriate freedom being given to vendors and the Bruce Power staff to think differently. Laveer continues to supply unique engineering services and products to Bruce Power in support of Fuel Channel delivery machine and tooling qualification, and we are actively supporting development of high quality and innovative mock-ups to support MCR tooling development and qualification.

The investment that Bruce Power is making is substantial admirable from a private enterprise to invest in what is effectively public infrastructure (i.e., power to the masses). Bruce Power has stated and shown through work thus far on Major Component Replacement (MCR) and through the Restart of Units 1 & 2, that a majority of that investment is effectively investing in Ontario workers. No other energy source is as labour intensive as nuclear and the required labour includes those that require higher education and resultant high compensation. Moreover, even with that demand on labour to carry out the work at Bruce Power, the unit energy cost is still almost the lowest available in the Ontario energy mix. From a purely economic standpoint, support for nuclear power just makes sense. Finally, a source of energy that doesn't

produce greenhouse gases needs to be a priority for the provide (and country). Given the power and energy density of nuclear as well as the ability to function at night and without wind make it the one of the only available choices to deal with the baseload demand.

For Bruce Power to be making such a significant and long term (>40 years) commitment to the Bruce site and to Ontario jobs, it is only reasonable for Bruce Power to request a similar commitment from the nuclear regulatory authority. Granting a 10 year licence does not preclude any of the rigour required to ensure safe operation of these two pristine nuclear power stations, but provides additional confidence to its own investors that one of the biggest stakeholders (the CNSC) also agrees that Bruce Power is doing the right things to operate the plants in a safe manner.

Laveer Engineering has directly seen support for small businesses and continually pushes vendors to provide as much local content as possible and even become local themselves by opening an office in the region and making Bruce County their home. Laveer is actively looking at space in Bruce County for this reason and granting Bruce Power a 10 year licence will only strengthen the case for many more vendors to become locals to Bruce County.

It is with the discussion above in mind that that Laveer Engineering wishes to express its utmost support to Bruce Power in its application for a 10 year licence renewal. The ongoing operations as well as MCR are of very high value to the people of the province to provide low cost, clean energy as well as high quality, high paying jobs – all of this from an organization with a proven safety record operating public assets that still have tremendous economic value to provide.

Best Regards,

Richard Meguerian, P.Eng.
Program Manager
Laveer Engineering