



**Written submission from  
Énergie NB Power**

**Mémoire d'Énergie NB Power**

In the Matter of

À l'égard de

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

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

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

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

**Commission Public Hearing – Part 2**

**Audience publique de la Commission –  
Partie 2**

**May 28-31, 2018**

**28-31 mai 2018**





**Énergie NB Power**

Point Lepreau Nuclear Generating Station  
PO Box 600, Lepreau, NB  
E5J 2S6

**TU 06374**

April 12, 2018

Senior Tribunal Officer  
Canadian Nuclear Safety Commission  
280 Slater Street  
P.O. Box 1046  
Station B, Ottawa, ON K1P 5S9  
Email: [cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)

Dear Senior Tribunal Officer:

**Subject: Bruce Power Inc. Nuclear Power Reactor Operating Licence for the Bruce Nuclear Generating Stations (NGS) A and B**

My name is Brett Plummer. I am the Chief Nuclear Officer at the Point Lepreau Nuclear Generating Station, operated by New Brunswick Power Corporation (NB Power).

I would like to intervene in writing to the Canadian Nuclear Safety Commission hearing on May 30-31, 2018, in Kincardine, Ontario, for the renewal of the Bruce Power Inc. Nuclear Power Reactor Operating Licence (Bruce Nuclear Generating Stations A and B) for a period of 10 years.

As Canadian nuclear operators, Bruce Power and NB Power share many commonalities. As a starting point, our plants are both CANDU technology, developed here in Canada. We regularly work together with Bruce Power and other CANDU operators on research and development projects that improve the safety and productivity of our plants and that have helped us achieve some of our strongest results ever.

We also share a deep a commitment to excellence in safety, reliability, cost and environmental performance through continuous improvement in our organizations, plant equipment and our human performance. We are part of a Canadian nuclear community of tens of thousands of people who have dedicated their careers to ensuring nuclear operations are always executed in the best interest of the people we serve, whether those people live in Ontario or New Brunswick. This means reaching for the highest standard possible in our work and striving for innovation in our equipment, processes and activities, every day.

Nuclear power workers train as engineers, environmental scientists, tradespeople, operators and maintainers as well as emergency responders, business people, trainers and communicators. They often spend several years in university, college and apprenticeship programs before starting their career and then continue their education and training over a lifetime to continuously improve their on-the-job skills and knowledge.

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Collectively, these efforts produce an affordable, reliable supply of electricity to power our hospitals, churches, workplaces, schools and homes while also ensuring clean air, land and water.

Bruce Power has created a program called “**You Can Count on Me**” that reflects these values. The program is a commitment to individual leadership and accountability for workplace safety and health. It strives for targets such as zero injuries. It instils a strong workplace safety culture. Bruce Power has shared this program with our entire industry, helping to strengthen safety performance not only here in Canada but in CANDU plants worldwide.

As an industry, we share this commitment to strive for excellence. We track our progress and aspire for continuous improvement at Point Lepreau. I know this is true of our counterparts at Bruce Power and Ontario Power Generation (OPG), as well. I know this, because we work together every day on many initiatives that help us meet these goals.

Collaboration between NB Power and Bruce Power takes place in many forums including the CANDU Owners Group (COG) where CANDU-operating companies together invest in R&D and joint projects toward research for plant, equipment and process improvements. Through COG, we have an opportunity to share years of learnings and operating experience through OPEX databanks and peer-to-peer activities as a CANDU industry. As well, we gain similar advantages through membership in the Electric Power Research Institute (EPRI) and the World Association of Nuclear Operators (WANO) as well as the International Atomic Energy Agency (IAEA) where we collaborate with nuclear operating peers worldwide. Collaboration also takes place in benchmarking visits, other inter-utility activities and the conversations held peer-to-peer across stations at all levels of the plant right up to the chief nuclear officers. We learn from each other, observe each other and coach each other with the same questioning attitude we share amongst our own teams in our plants.

The work we do together covers a wide range of operating aspects including:

- Improving plant performance, such as pressure tube fitness for service and safety margins;
- Strengthening our environmental practices, such as management of fish impingement and entrainment;
- Strengthening safety and security, such as work on emergency preparedness and security of both our physical plant and cyber systems.

Over the years, we have seen Bruce Power emerge as industry leaders in emergency preparedness, industrial safety and innovations in fuel channel inspections. This includes the innovative technology developed by Bruce Power and the supplier community – the Bruce Reactor Inspection Maintenance System (BRIMS). This has helped Bruce Power reduce radiation dose and personal contamination events to among the best in the global industry.

Much like Point Lepreau, Bruce Power is committed to having a positive relationship with Aboriginal groups and communities. Bruce Power understands that its primary base of operations lies within Aboriginal traditional territories. We applaud Bruce Power for being awarded the Gold level certification for excellence in Progressive Aboriginal Relations through Canadian Council of Aboriginal Business (CCAB) in 2014 and again in 2017. Bruce Power is one of only 17 companies in Canada to receive the designation.

Bruce Power operates in a rural area where they are central to the community's social and economic health and like our own employees, Bruce Power's employees work in the same community where they live and raise their families.

As we do here in New Brunswick, I know Bruce Power takes social responsibility to heart. This is part of their strong, and personal, motivation to ensure the plant's safety and environmental programs are world class.

On the environmental front, we note that Bruce Power completed an Environmental Risk Assessment to support its licence application that confirmed its site has no significant adverse environmental impacts. This is no surprise. As with all Canadian licensees, Bruce Power has an extensive environmental monitoring program that samples and analyzes the water, air, soil, vegetation and wildlife in its immediate area to ensure its operations do not adversely impact their community or their neighbours.

Although we live and operate our plants in provinces many kilometres apart, we truly are neighbours, part of the same community.

Sincerely,



Brett Plummer  
Vice President Nuclear and Chief Nuclear Officer

BP/KD

cc. S. Demmons , K. Duguay, R. Gauthier, S. Waycott (NBP)