



Oral Presentation

Exposé oral

Submission from the Historic Saugeen Metis

Mémoire des Historic Saugeen Metis

In the Matter of

À l'égard de

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

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

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



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April 11, 2018

Our File: CNSC
Your File:

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, ON
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BY EMAIL: secretariat@cnsccsn.gc.ca

Dear Sir/Madam,

**Re: Historic Saugeen Metis
Written Submission To Canadian Nuclear Safety Commission
Comments on Bruce Power Inc. Licence Renewal Application
Bruce A and B Nuclear Generating Stations**

Please be advised that the Historic Saugeen Metis (HSM) intends to participate in the CNSC Public Hearing for Bruce Power Licence Renewal Application Bruce A and B Nuclear Generating Stations. We understand the Hearing is scheduled for Kincardine, Ontario May 30 to 31, 2018.

HSM makes the enclosed written submission to the Commission. It includes the following matters:

- HSM Overview
- Environmental Goals and Objectives
- HSM Relationship with the Nuclear Industry
- HSM Support for Bruce Power
- Engagement Activities with Bruce Power
- Engagement Activities with CNSC
- Conclusions and Recommendations

We trust the Commission will give our comments careful consideration.

Yours very truly,

A handwritten signature in blue ink, appearing to read "A. Indoe". The signature is fluid and cursive, with a prominent initial "A" and a long, sweeping tail.

Archie Indoe
President
Historic Saugeen Metis

Enclosure: 1



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April 11, 2018

Our File: CNSC- Bruce
Power Licence
Renewal 2018

Historic Saugeen Metis
Written Submission to
Canadian Nuclear Safety Commission

Comments on
Bruce Power Inc.

Licence Renewal Application
Bruce A and B
Nuclear Generating Stations

CNSC Public Hearing
Scheduled for:

May 30 & 31, 2018
Kincardine, Ontario

Submitted by:
Historic Saugeen Metis Council

Table of Contents

	Page
Executive Summary	3
Document Structure	4
1.0 Introduction: HSM Overview	4
2.0 Overview of HSM Practices	5
3.0 History of HSM	5
3.1 Identity and Continuity	7
4.0 HSM Environmental Goals and Objectives	8
5.0 HSM Relationship with Nuclear Industry	9
6.0 HSM-Bruce Power Participation Agreement	9
7.0 Engagement Activities with Bruce Power	10
7.1 HSM-Bruce Power Working Group Meetings	10
7.2 HSM Support for Bruce Power	10
7.3 HSM Engagement & Support Process	10
8.0 Bruce Power Public Information and Disclosure Program	11
9.0 Bruce Power Aboriginal Relations Program	12
10.0 Bruce Power Environmental Quantitative Risk Assessment (EA)	12
11.0 Bruce Power Predictive Effects Assessment (PEA)	13
12.0 CNSC Engagement Activities with HSM	15
13.0 CNSC Commission Member Document (CMD) 18-H4	16
14.0 Conclusions and Recommendations	16
Appendix A – Engagement Plan & Log	
Appendix B – Letter of Support	

EXECUTIVE SUMMARY

Today, Historic Saugeen Metis (HSM) continue their subsistence fisheries and land-based harvesting practices and assert Aboriginal rights over the lands and waters surrounding the Bruce Power site. These lands and waters provide vital support for our Métis culture and way of life, as well as the economy, health and social relationships in the HSM community.

HSM's intention with regard to the environment is long-term preservation of natural features and resources. HSM supports development that meets the needs of the present without compromising the ability of future generations to meet their needs, specifically where it relates to HSM's ability to continue their traditional harvesting practices, rights and interests.

Our concerns are for safe operation of the nuclear generating stations with minimal imprint on the water and lands that support our community's asserted Aboriginal rights. These are communal Aboriginal rights affirmed by Section 35 of the *Constitution Act* (1982), and relate to sustenance and harvesting on the land and in the waters surrounding the site of Bruce Power.

HSM has been engaged with Bruce Power on the proposed 10 year licence renewal since early 2016. HSM first met with Bruce Power February 5, 2016 to discuss the licence renewal for Bruce A and Bruce B which includes Major Component Replacement (MCR) activities. The discussions with Bruce Power have been positive to date. Bruce Power has made timely and effective efforts in addressing HSM's concerns related to licence renewal. On March 6, 2018 HSM held a Community Meeting to share information and discuss Bruce Power's Licence Renewal Application. The meeting drew an attentive group of community members, with an opportunity to hear an oral report from HSM staff, ask questions and obtain information handouts. The overall response to the licence renewal application was supportive, noting that ongoing environmental monitoring and continued engagement were important to the community. HSM looks forward to continuing to be informed, consulted and engaged, and to maintaining the good relationship with Bruce Power.

Bruce Power Inc. continues to provide countless opportunities for employment, high-skilled jobs for local Metis. Local Metis families have realized a standard of living and opportunities that were unlikely in the past. HSM believes nuclear generation is the safest, cleanest, most reliable source of energy available. It leaves a clean environment for harvesting, and has the added benefit of steady, well-paid jobs that supports the Province's and local economies.

Given HSM's traditional use of the lands in the area of the nuclear generating stations and surrounding lands, the Historic Saugeen Métis have a profound need for involvement over the licence period. Accordingly, HSM has a substantial interest in many decisions relating to the management of nuclear activities at the site operated by Bruce Power.

We trust the Commission will give our comments careful consideration.

DOCUMENT STRUCTURE

To assist the Commission, HSM's written submission will focus on the following areas:

1. HSM Overview
2. Overview of HSM Practices and Interests
3. History of HSM
4. HSM Long-Term Environmental Goals and Objectives
5. HSM Relationship with Nuclear Industry in the Area
6. HSM –Bruce Power Participation Agreement
7. Engagement Activities with Bruce Power.
8. Bruce Power Public Information and Disclosure Program
9. Bruce Power Aboriginal Relations Program
10. Bruce Power Environmental Quantitative Risk Assessment
11. Bruce Power Predictive Effects Assessment
12. CNSC Engagement Activities with HSM
13. CNSC Commission Member Document (CMD) 18-H4
14. Conclusions and Recommendations

1.0 INTRODUCTION: HSM OVERVIEW

The local Historic Saugeen Métis (HSM) consists of the politically independent historic Métis, beginning with trader Pierre Piché in 1818, whom have resided along the Lake Huron proper shoreline from the islands at the tip of the Bruce Peninsula to the Ausable River in the vicinity of Port Franks, Ontario.

Upon Piche's arrival in the traditional Saugeen territory in 1818 the Ojibwe Piché "dish with one spoon" *bead wampum* exchange took place inviting the Piché Métis trading family into the traditional Saugeen territory.

About the same time Piché was joined by other similar Métis trading families comprised of third and fourth generation members of existing Great Lakes trading networks. Also arriving were trading families from the Northwest who after the NWC/HBC merger in 1821 entered Lake Huron either as HBC employees or former NWC traders trading on their own account.

From these distinct groups emerged a distinctive Métis community rooted along the shoreline of eastern Lake Huron. For almost three decades prior to settlement of the Saugeen territory, the Historic Saugeen Métis traded in a south-north axis along the shoreline from above Sarnia to Lake Huron's North Shore.

Present-day Historic Saugeen Métis community members are descendants of the *historic* Métis who have lived in, cared for and relied on the shared traditional Saugeen territory since the time of Piché. Some Historic Saugeen Métis Council (2018) and community members descend from the Piché Wampum carrier, Marguerite Lange Gonneville, and other Métis families of that era.

2.0 OVERVIEW OF HSM PRACTICES

Prior to 19th century treaties with the Crown, the HSM harvested the lands and waters bordering Lake Huron proper and the Saugeen Peninsula to as far south as the Port Franks area. This area included HSM places of residence, places where HSM pursued their traditional practices and pursuits, and places of cultural and spiritual significance.

Today, HSM continue their subsistence fisheries and land-based harvesting practices and assert aboriginal rights over the lands and waters surrounding the Bruce Power site. These lands and waters provide vital support for our Métis culture and way of life, as well as the economy, health and social relationships in the HSM community.

From early days in Lake Huron, whitefish was and is a staple of HSM. Other subsistence fishing focused on species commonly caught along the coastal shores and rivers, especially the Saugeen and Maitland Rivers, which were important tributaries to Lake Huron. These species included Channel catfish, Carp, Chub, Yellow Perch, Lake Trout, Brook Trout, Brown trout, Cisco/Lake Herring/Tullibee, Smelt, suckers and large and small mouth bass.

Historically and to the present day, the Historic Saugeen Métis rely on the lands that include the Bruce Power site and surrounding area to harvest deer and other mammals, water and land fowl, and plants.

3.0 HISTORY OF HSM

The local Historic Saugeen Métis (HSM) consists of the politically independent historic Métis, beginning with trader Pierre Piché in 1818 that have resided along the Lake Huron proper shoreline from the islands at the tip of the Bruce Peninsula to the Ausable River in the vicinity of Port Franks, Ontario.

In 1818 upon Piché's arrival in the traditional Saugeen territory the Ojibwe Piché "dish with one spoon" *bead wampum* exchange took place inviting the Piché Metis trading family into the traditional Saugeen territory. One dish, one spoon was an invitation to share harvesting areas in the traditional territory. It was about maintaining peace with respect to any hunting disputes, and about the ancient sharing of their bounty so that all may "eat" from the same bowl.¹

Soon Piché was joined by other Great Lakes traders and former NWC and HBC traders surplus to the northern trade after 1821. About 1828 upon Piché leaving the territory, the wampum strings were passed to kin, cousins from the North West. This was NWC/HBC voyageur and Saugeen trader Augustin Gonneville

¹ The Cornell Journal of Law and Public Policy, Volume 16 Number 3, Summer 2007, Joyce Tekahnawiiaks King wrote about THE VALUE OF WATER AND THE MEANING OF WATER LAW FOR THE NATIVE AMERICANS KNOWN AS THE HAUDENOSAUNEE.

whose Cree wife, Marguerite Lange Gonneville, became the second wampum carrier.

In 1889 Mary Gonneville became the third wampum carrier upon the death of her mother. Following Mary's death in 1902, her husband Fred de Lamorandière, Clerk to the Nawash Band, donated the string beads wampum to the Ontario Museum (Department of Education), now the Royal Ontario Museum.

Present-day Historic Saugeen Métis community members are descendants of these *historic* Métis who have lived in, cared for and relied on the shared traditional Saugeen territory since the time of Piché. Some Historic Saugeen Métis Council (2018) and community members descend from the Piché Wampum carrier, Marguerite Lange Gonneville, and other Metis families of that era.

HSM, although an established aboriginal community, was not a signatory to any treaty and has never extinguished their aboriginal rights.

The Bruce A and B Nuclear Generating Stations are situated in the centre of the traditional Saugeen territory. Many HSM community members reside within a few kilometers of the site. Also, the major HSM community location of Southampton is within 35 kilometers of the Bruce Nuclear site, home of the Bruce A and B Nuclear Generating Stations. HSM ancestors are buried within a very short distance of the site.

The Bruce A and B Nuclear Generating Stations are situated on the shoreline and substantially interact with Lake Huron, the traditional waters of the local Métis where the HSM continue to exercise and rely on their traditional territory for subsistence in respect of their harvesting rights, including their section 35 Constitution Act (1982) constitutionally protected fishing rights.

It is for these reasons that HSM has particularly deep and substantial interests in the Bruce Power Inc. Licence Renewal Application Bruce A and B Nuclear Generating Stations and have a profound need for involvement over the licence period.

Further, the duly-elected local Historic Saugeen Metis Community Council has been entrusted to protect the local Metis communal rights and have the obligation to be part of any process that determines what is being done to monitor and ensure the safe operation of the Bruce A and B Nuclear Generating Stations.

HSM *are* among the indigenous peoples who have lived in, cared for and relied on the traditional Saugeen territory for generations. It is the responsibility of the current HSM Council to ensure a sustainable environment for current and future Metis families claiming Section 35, Canada Constitution Act (1982) aboriginal rights in the traditional Metis Saugeen territory.

3.1 Identity and Continuity

Integral to the endurance of the Métis families upon moving from the Northwest to trade in the HBC Lake Huron District were the traders' irreducible individualities as Nor'Westers, that is having been former North West Company. Their identities had formed over decades while serving at company posts from Fort William to the Red River.

These men and families had weathered many serious incidents in the fur trade involving early encroachment on their fur trade territories and, more recently, colonizing ambitions in the Red River. Some had witnessed the Battle of Seven Oaks and had family members seized at Fort William in 1816 by Selkirk's men.

In 1821 as they entered Lake Huron to trade for the Company, their distinctive family characteristics were unshakeable, having been formed years before as traders, fishers and hunters, gatherers, weavers, and canoe makers. Seasonal round shaped their lives. Shoreline homes were kept from below Goderich to Lake Huron's Northshore. As the trade declined some moved on while others, known today as the Historic Saugeen Metis, remained in the Saugeen territory.

The links of the historic Saugeen Métis families to specific economic activities in distinct areas, collectively a *cohesive trading network*, helped define the identity of the local Métis community known today as *the Historic Saugeen Métis*. Key to understanding the HSM Métis community is insight into individual family strategies necessary for survival in harsh environments, as can be seen in their seasonal harvesting activities.

Supported by fur trade kinship, fictive and familial, the HSM community grew along the eastern shoreline of Lake Huron proper and transitioned from the fur trade by adapting their skills to occupations reliant on their traditional way of life and use of lands and waters. As the fur trade declined, occupations included fishermen, coopers, sailors, schooner captains, guides, trappers, and hunters. Settlement found the Nor'Westers yet independent, refusing to be "nudged" from their lakefront properties.

By the 1850s when settlement occurred, the bonds amongst the Historic Saugeen Métis community remained strong, resulting in the preservation of a distinctive Métis way of life and common culture and customs in the Saugeen territory. By this time, the Historic Saugeen Métis had developed a "Saugeen" identity, an identity held steadfast to this very day.

The Historic Saugeen Métis, a distinctive Métis community that occupied lands along the Lake Huron shore from Sarnia to Tobermory and the islands, have resided with continuity along the Lake Huron shoreline since the early 1800s. Today the independent HSM consist of over two hundred registered descendants of historic families prior to settlement. These rights-bearers, added together with their dependent family members total between four and five hundred members,

are supported by community efforts in different ways, including elders' luncheons and activities and assistance for post-secondary students.

In May 2013, the HSM community opened the HSM Interpretive Learning Centre in the heart of the Southampton tourist shopping area. It serves as a community meeting place and a public learning centre that fosters greater awareness of local Métis culture and heritage. On free display are Metis artifacts and cultural items donated by the Metis community and others.

The year 2018 will be the year of Wampum to commemorate the strings of bead that were presented to Pierre Piché in 1818 as a tangible reminder, an enduring record, of the historic diplomatic exchange, and the words spoken between the Ojibwe and Métis, that formed their peaceful and sharing relationship in the Saugeen territory.

The HSM contemporary community's goals include sustainability of the environment Saugeen territory's environment for the exercise of the community's Section 35, aboriginal rights; fostering increased tolerance for diversity of the area's peoples, and respect for the area's history and its Métis culture.

4.0 HSM LONG-TERM ENVIRONMENTAL GOALS AND OBJECTIVES

HSM's long-term vision and objective is focused on promoting and protecting the sustainability of the environment within the traditional Saugeen territory as it relates to local Métis interests, rights and way of life.

HSM's intention with regard to the environment is long-term preservation of natural features and resources. HSM supports development that meets the needs of the present without compromising the ability of future generations to meet their needs, specifically where it relates to HSM's ability to continue their traditional harvesting practices, rights and interests.

Prudent and sustainable use and reuse of natural resources while providing for continued improvements to quality of life and economic development for future generations is included in HSM's long-term vision.

Specifically, HSM's main goal when looking at environmental protection is maintaining the integrity of the local environment so that it can support a healthy harvest now and into the future.

HSM is committed to providing an environmental legacy to future generations of HSM citizens that they can be proud of and be confident will continue to support at least the next seven generations of HSM citizens. The involvement of local Métis decision-makers is essential to these goals.

5.0 HSM RELATIONSHIP WITH NUCLEAR INDUSTRY

Our local Métis community, having inhabited in this area two hundred years, has many of the same concerns raised by others in this proceeding.

Our concerns are for safe operation of the nuclear generating stations with minimal imprint on the water and lands that support our community's asserted Aboriginal rights. These are communal Aboriginal rights affirmed by Section 35 of the *Constitution Act* (1982), and relate to sustenance and harvesting on the land and in the waters surrounding the Bruce Nuclear Site.

Our local Métis community, together with all other communities in the area, Aboriginal and non-Aboriginal, have benefited economically over the past five decades as a result of nuclear energy generation at the Bruce site. Four generations of Saugeen Métis have worked at the Bruce Nuclear site and continue to benefit from its activities.

One of the goals of the Historic Saugeen Métis relating to Bruce Power is to continue a clear, timely and effective process for communication, exchange of key information, and meaningful input and consultation during the licence period.

In addition to being continually informed about potential impacts of the nuclear generating stations, the continued involvement of HSM such as through monitoring and reporting processes and procedures also help to build positive relationships between HSM and Bruce Power.

Through established monitoring/reporting processes and open communication, and by having a positive relationship, HSM hopes to continue the confidence throughout the entire licence period that the operation either (i) does not adversely impact HSM's traditional harvesting activities or (ii) if adverse impacts will likely result, the parties will work together in a timely manner to identify measures for mitigating the adverse impact.

HSM believes that it is through these processes that HSM will maintain the necessary confidence to assure its members of the community's ability to continue to exercise their Metis traditional harvesting activities.

Today the local historic Métis descendants are organized as an independent Métis community located at Southampton. The proposed licence renewal involves a regulated facility which is situated within the heart of HSM traditional territory.

6.0 HSM – BRUCE POWER PARTICIPATION AGREEMENT

The HSM-Bruce Power "Amended and Restated Participation Agreement" December 6, 2017 continues a Working Group to work together to achieve the objectives and commitments of the Agreement.

This Agreement is effective and remains in place throughout the duration of Bruce Power operating the Generating Stations. This Agreement does not prejudice, limit, effect, or constrain the positions either party may take in relation to Regulatory Approvals and discussions with the Crown.

7.0 ENGAGEMENT ACTIVITIES WITH BRUCE POWER

7.1 HSM-Bruce Power Working Group Meetings

HSM has been engaged with Bruce Power on the proposed licence renewal since early 2016. HSM met with Bruce Power February 5, 2016 to discuss licence renewal for Bruce A and Bruce B.

Working Group Meetings held since the previous 2015 licensing period are as follows:

- 2016 held 3 meetings
- 2017 held 4 meetings
- 2018 held 2 meetings

The discussions with Bruce Power have been positive and productive to date. Bruce power has made timely and effective efforts in addressing HSM's concerns related to licence renewal. HSM looks forward to continuing to be informed, consulted and engaged, and to maintaining the good relationship with Bruce Power.

7.2 HSM Support for Bruce Power

An HSM letter of July 16, 2013 addressed to the Ontario Minister of Energy supported Bruce Power's role in Ontario's energy mix, and urged that the Province maintain or increase the current role that Bruce Power plays in Ontario's energy mix and long-term energy planning. The letter also mentioned that the community has gained confidence from Bruce Power's commitment to Aboriginal Consultation and Engagement. The same letter stated that the HSM community has experienced considerable economic benefit from over fifty years of safe nuclear generation in the local territory.

Bruce Power Inc. continues to provide countless opportunities for employment, high-skilled jobs for local Metis. Local Metis families have realized a standard of living and opportunities that were unlikely in the past. HSM believes nuclear generation is the safest, cleanest, most reliable source of energy available. It leaves a clean environment for harvesting, and has the added benefit of steady, well-paid jobs that supports the Province's and local economies.

7.3 HSM Engagement & Support Process

Purpose – Duty to Consult

Historic Saugeen Metis (HSM) are among the indigenous peoples who have lived

in, cared for and relied on the traditional Saugeen territory for generations. It is the responsibility of the current HSM Council to ensure a sustainable environment for current and future Metis families claiming Section 35, Canada Constitution Act (1982) aboriginal rights in the traditional Metis Saugeen territory.

The HSM Lands, Resources, and Consultation Department supports the policies of HSM Council by advising and assisting development proponents with their duty-to-consult about projects occurring within Metis Saugeen territory.

Consultation and Engagement - We have refined our procedures for consultation and engagement where Metis interests and/or rights may be affected by proposed developments on land or water within our traditional territory. In particular, we review Archaeological Assessment, Built Heritage Resources, Cultural Heritage Resources, and Environmental Assessment Reports on proposed developments to ascertain the impacts on our Metis Community.

Engagement Plan and Log - In many instances when projects evolve over a longer period of time we work with proponents to prepare an Engagement Plan and complete an Engagement Log of events and activities for specific projects.

Letter of Support - For larger projects, and as may be required by legislation or regulations, a Letter of Support can be issued by our Metis Council.

Capacity and Benefit Agreements - Often our staff effort and communication of project information to Metis Community members will require a Capacity Agreement to enable our work. Benefit Agreements may also be reached with proponents where the effects of projects are predicted over several years.

Our Clients - Our consultation and engagement procedures have been implemented with a variety of clients involving the nuclear, wind, and solar energy sectors, federal and provincial regulators, and municipal governments.

8.0 BRUCE POWER PUBLIC INFORMATION AND DISCLOSURE PROGRAM

The CNSC requires nuclear power plant operators and other major licensees to maintain a "Public Information and Disclosure" program supported by robust disclosure protocol that address stakeholders' needs.

Bruce Power has a well-established "Public Information and Disclosure" program that meets the regulatory requirements of CNSC's REGDOC 3.2.1 Public Information and Disclosure. The program ensures that information about the health, safety and security of persons and the environment, and other issues associated with the lifecycle of Bruce Power's facilities are effectively communicated to the public. In doing so, Bruce Power's program recognizes the

importance of actively providing updates and briefings to First Nations and Métis leaders and communities.

9.0 BRUCE POWER ABORIGINAL RELATIONS PROGRAM

CNSC REGDOC 3.2.2 sets out the requirements and guidance for licensees on Aboriginal engagement. Bruce Power's Aboriginal Relations Program ensures informative, timely and respectful consultation and engagement with a focus on supporting our community's asserted Aboriginal rights.

Bruce Power's Aboriginal Relations Program also promotes the hiring of qualified Aboriginal employees and development students, strengthening the communities through sponsorship support and identifying opportunities to preserve and enhance the local environment.

Bruce Power has a workforce of more than 4,200 full-time employees that consists of strong technical competency in every discipline, from engineering to people in the skilled trades.

10.0 BRUCE POWER ENVIRONMENTAL QUANTITATIVE RISK ASSESSMENT (EA)

Bruce Power conducted an Environmental Risk Assessment as part of the Application to renew the Bruce A and B Nuclear Generating Stations Power Reactor Operating Licence for a period of 10 years.

Bruce Power continues to examine the impact of impingement and entrainment on fish populations in Lake Huron. The EA summary of the ongoing monitoring program indicates non-significant impacts on Lake Whitefish, Deepwater Sculpin, and Spottail Shiner. CNSC staff concluded that impingement and entrainment of fish do not result in population-level effects on fish populations in Lake Huron.

Bruce Power has monitored, and continues to monitor, the thermal effects of Condenser Cooling Water (CCW) on aquatic life from discharges for both Bruce A and Bruce B. In 2016, HSM supported the Bruce A Effluent Environmental Compliance Approval Application noting no anticipated adverse impacts to Metis rights, culture or way of life.

CNSC staff has determined that Bruce Power's actions during the licensed period, including environmental monitoring, effluent and emissions control and monitoring activities to assess the accuracy of predictions and the effectiveness of mitigation measures identified in the EA provide adequate controls for the protection of the environment and the public.

These actions include the following:

- MCR and Life Extension
- Quantitative Environmental Risk Assessment
- Thermal Effluent ECA – Bruce A
- Fisheries – impingement & entrainment – offset measures
- Discharge - Bruce A ECA - Old Water Treatment Plant Pre-filtration / Four Unit Outage Discharges to Cooling Water Discharge Duct

11.0 BRUCE POWER PREDICTIVE EFFECTS ASSESSMENT (PEA)

The Predictive Effects Assessment (PEA) incorporates assessment of future activities for the Life-Extension Program including MCR, outages and routine operations, to estimate the associated environmental effects for environmental risk assessment.

A Preliminary Quantitative Risk Assessment (PQRA) for the site was submitted to and accepted by the CNSC in 2015. The baseline ERA has assessed the potential environmental risks due to historical and ongoing operations from the site. The purpose of this Baseline ERA update is to support licence renewal. Specifically, it provides updated baseline information through 2016 and associated ERA predictions, as well as forms the basis for forward-looking predictions within the Predictive Effects Assessment.

The PEA was conducted to characterize and illustrate how the environment and health of persons will continue to be protected during ongoing future operations, including MCR. The specific goals of PEA are to:

- identify changes from the current operational state to future operations, including MCR, and assess which changes result in changed environmental emissions or effects,
- evaluate the risk to human and ecological receptors based on the future scenarios,
- identify the specific objectives for environmental monitoring,
- provide support for the licensing of future Bruce Power activities

Noise – The predicted change in noise levels as a result of MCR activities will not likely be measureable (i.e. not discernible from existing conditions) at off-site receptors locations, as the predicted levels are consistent with current conditions.

Air Quality – The predicted change in air quality levels as a result of MCR activities will likely result in relatively short durations of measureable effect. Predicted effects are under control of the site and readily reversible. All construction activities are anticipated to meet Derived Release Limits (DRL) , and subsequently CNSC and International Atomic Energy Agency (IAEA) regulations and guidance.

Surface Water – The predicted change in waterborne emissions as a result of MCR activities will likely result in relatively short durations of measureable effect. Predicted effects are under control of the site, and for pathways that are not an appropriate level of conservatism has been assumed. All construction activities are anticipated to meet DRL limits, and subsequently CNSC and IAEA regulations and guidance.

Groundwater – The only MCR activity that was identified as potentially resulting in a measureable change in groundwater was the establishment of the Bruce B Parking Lot Expansion. The runoff from the expanded parking lot could affect groundwater quality, as there will be a greater paved area being treated with salt during winter conditions.

Geology and Soil – No future activities were found to have a likely measureable change on soil quality.

Aquatic and Terrestrial Environment – The current and predicted radiation dose rates to non-human biota residing on or near the site are less than 3% of the applicable United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR) benchmark value for aquatic biota. For non-radiological all derived Hazard Quotients (HQs) were below one, therefore, there is no non-radiological risk to aquatic biota resulting from normal operations on the site.

Human Environment – The current and predicted radiation dose rates to human receptors in the vicinity of the site are less than 1% of the CNSC effective dose limit for a member of the public (1mSv/y). There is no radiological risk to human health for members of the public resulting from normal operations on the site. The non-radiological Human Health Risk Assessment (HHRA) evaluated the potential for health risks for members of the public, and the potential for health risks due to non-radiological chemicals and physical stressors were shown to be negligible considering normal operations on the site.

Terrestrial Environment – The current and predicted radiation dose rates to non-human biota residing on or near the site are less than 3% of the applicable (UNSCEAR) benchmark value for aquatic biota. For non-radiological all derived HQs were below one. However, potential risks for wildlife on or near the site due to non-radiological chemicals were greater than the target HQ of 1. These risks are limited to direct contact with soils and foodstuffs within the Construction landfill #4, the Fire Training Facility, and the Bruce A Storage Compound, and two isolated samples found along the access road next to Bruce B and close to the Former Sewage Lagoon. Therefore, it is concluded that there is no non-radiological risk to terrestrial biota resulting from operations on the site.

Environmental Monitoring and Protection Programs –The Environment Department is a stakeholder in the design process and are involved in the planning of the project and this knowledge was used as inputs to the assessment

presented. Environmental Impact Worksheets (EIWs) were completed for each activity to review the scope of each activity and potential environmental effects and controls. Any monitoring or mitigating actions to eliminate or minimize the environmental effects are detailed in the EIWs. Activities with a larger scope (eg. construction of new buildings) are required to also complete Environmental Management Plans at the detailed design stage.

In all cases the current conditions were considered bounding, or the predicted conditions were screened as being acceptable. No interactions were identified in the PEA that may pose an unacceptable risk to humans or the environment during future site activities, including MCR. To this extent, the PEA conclusions support the Historic Saugeen Metis identified interests which include:

- its ability to continue their traditional harvesting practices, rights and interests,
- the maintenance of the integrity of the local environment so that it can support a healthy harvest now and into the future and,
- the identification of measures in a timely manner to mitigate adverse impacts if likely

12.0 CNSC ENGAGEMENT ACTIVITIES WITH HSM

The Crown law duty to consult with Aboriginal groups applies when the Crown contemplates actions that may adversely affect asserted or established Aboriginal and/or treaty rights. The CNSC, as an agent of the Crown and as Canada's nuclear regulator recognizes and understands the importance of building relationships and consulting with Canada's Aboriginal peoples. The CNSC ensures that all its licensing decisions under the *Nuclear Safety and Control Act* (NSCA) uphold the honour of the Crown and consider Aboriginal peoples' potential or established Aboriginal and/or treaty rights pursuant to section 35 of the *Constitution Act, 1982*.

The CNSC, Fisheries and Oceans Canada and the Province of Ontario are participating in a whole-of-government approach to uphold the honour of the Crown. Acting as the Crown Consultation Coordinator, the CNSC coordinates consultation activities on behalf of the federal and provincial governments and strives to provide a single point of contact for Aboriginal communities and organizations.

CNSC staff are committed to continuing discussions with interested First Nations and Métis groups on the Bruce A and B licence renewal applications. HSM attended the Huron/Saugeen Watershed Workshop in June 2017, coordinated by CNSC with a purpose to exchange knowledge and share information on fisheries issues. On August 1, 2017 CNSC staff met with HSM representatives to discuss licence renewal for Bruce A and Bruce B. CNSC staff provided an overview of CNSC's licensing review process and information on the status of the proposed

Bruce Power licence renewal application which includes Major Component Replacement activities.

CNSC and HSM held a biannual meeting on February 27, 2018 to further discuss issues related to the Bruce Power Licence Renewal and the scheduled CNSC Public Hearings. Discussions included impingement and entrainment, thermal effluent and the recent Commission Member Document report. CNSC also outlined the Independent Environmental Monitoring Program, discussing opportunities for HSM to participate in the program. HSM staff outlined the formal process for engagement and support where Métis interests and/or rights may be affected by proposed developments on land or water within our traditional territory. CNSC staff also provided public information materials for the HSM Community Meeting regarding the Bruce Power 2018 Licence Renewal. No specific concerns with respect to the proposed Bruce Power licence renewal applications were raised.

13.0 CNSC COMMISSION MEMBER DOCUMENT (CMD) 18-H4

Within the CNSC Commission Member Document (CMD) 18-H4 (Feb. 12/18) Commission staff recommend the following: Renew the Nuclear Power Reactor Operating Licence (PROL) for Bruce Nuclear Generating Stations A and B for a 10 year period from September 1, 2018 to August 31, 2028.

In accordance with environmental assessment data from ongoing monitoring, CNSC staff are satisfied that risks to the environment or human health for the continued operation of the Bruce Power, including MCR are low to negligible. CNSC staff concluded that, based on the EA prepared under the NSCA, Bruce Power has and will continue to make adequate provision for the protection of the environment and the health of persons.

14.0 CONCLUSIONS AND RECOMMENDATIONS

Given HSM's traditional use of the lands in the area of the nuclear generating stations and surrounding lands, the Historic Saugeen Métis have a profound need for involvement over the licence period.

Further, the duly-elected local Historic Saugeen Métis Community Council, who has been entrusted to protect the local Métis communal rights, must be part of any process that determines what is being done to monitor and ensure the safe operation of the nuclear generating stations. HSM are among the Aboriginal peoples who have lived in, cared for and relied on the traditional Saugeen territory for many generations. Any adverse impacts from the licensed regulated facility would be felt first and foremost by the local HSM community, thereby

posing an ongoing risk to the continued exercise of HSM's section 35 Aboriginal rights.

Accordingly, HSM has a substantial interest in many decisions relating to the management of nuclear activities at the site operated by Bruce Power and supports Bruce Power's application for licence renewal of Bruce A and Bruce B.

APPENDIX A

ENGAGEMENT PLAN & LOG

**Historic Saugeen Metis
Written Submission to
Canadian Nuclear Safety Commission**

**Licence Renewal Application
Bruce A and B Nuclear Generating Stations
Bruce Power Inc.**

**Bruce Nuclear Site
Tiverton, Ontario**


Pre-Submission Engagement Record
Summary Log Template


1. Pre-Submission Engagement Summary

Name of Proponent: Bruce Power
Major Component Replacement (MCR) Life Extension and Licence Renewal

Name of Affected Party: Historic Saugeen Métis

Name(s) of representative(s) From Affected Party who participated in engagement	Dates of Engagement (e.g. list dates or range of dates)	Reason(s) for Engagement (e.g. application)	Overview of Issue(s) Resolved	Overview of Issue(s) Unresolved
Patsy McArthur Goldie Mielhausen Ross Lamont Ben Indoe Rick Davies George Govier Archie Indoe Wayne Longe Cole McArthur Audrey Holden Carolyn Myers Boone Jenna McGuire Chris Hachey	01 DEC 2015	Bruce A and B have a combined operating licence from the Canadian Nuclear Safety Commission (CNSC) that covers operations up to May 2020. Conditions for continued operations, requirements for nuclear safety enhancements, and return-to-service hold points for MCR life extension activities will need to be determined via a licence renewal application. To ensure that the licence is in place prior to starting the first Major Component Replacement Bruce Power will file an early intent to renew to ensure a licence is in place prior to 2020.	The Licence renewal requires submission of an entire technical review including an Environmental Risk Assessment, as per the Nuclear Safety Control Act. This evaluation is likely of most interest to HSM	Currently no outstanding issues

Signature of Proponent (representative) ¹:  Date: March 28, 2018

Signature of Affected Party (representative) ¹:  Date: March 28, 2018

¹ These Signatures represent agreement on the contents of the log and record, but do not necessarily imply that the parties agree on the topics that were discussed.

2. Pre-Submission Engagement Log

Date	Attendees	Engagement Activity Type (e.g. written notification, face-to-face, workshop, etc.)	Issue(s) Raised by Affected Party	Recommendation from Affected Party	Proponent Response to issue - indicate if issue(s) was resolved	Information materials provided to Affected party (Y/N)	Written correspondence, meeting notes, and/or minutes (Y/N)
01-DEC-2015	HSM Archie Indoe Bruce Power James Scongack	Email from Bruce Power to HSM providing a Letter and 5 year outlook package	<ul style="list-style-type: none"> 5 year outlook included all upcoming regulatory matters that will require engagement and/or consultation. This letter references MCR life extension (also referred to as CNSC licence) Appointment of John Peevers Corporate Affairs Department Manager as lead and single point of contact between Bruce Power and HSM. 	Nothing Specific	N/A at this time	Yes - Letter and Slide Deck	Y
20-JAN -2016 to 02-FEB-2016	HSM George Govier Bruce Power John Peevers	Email series arranging date for Q1 meeting of 2016	<ul style="list-style-type: none"> Bruce Power requesting to reschedule Q1 meeting start time to ensure all attendees present. Bruce Power indicating that they would like to discuss technical content 	No specific issue. HSM changed start time and attached agenda for meeting	N/A at this time	Yes - Agenda	Y

05 FEB 2016	HSM George Govier Ben Indoe Patsy McArthur Carolyn Myers Boone Goldie Mielhausen Bruce Power Mike Briggs Francis Chua John Peevers	Face to Face Quarterly Meeting	No issues raised pertaining specifically to MCR Life Extension (also referred to as CNSC licence, Future Refurbishments)	Nothing Specific as the meeting dialogue surrounded other files more in depth.	N/A at this time	Yes – Agenda, Regulatory 5 year look ahead, plus various other attachments not related to this file including Thermal Update and DFO Authorization Presentation	Y Notes on Meeting by HSM
06 MAY 2016	HSM George Govier Archie Indoe Ben Indoe Ross Lamont Patsy McArthur Goldie Mielhausen Carolyn Myers Boone Bruce Power Francis Chua Emily Johnston John Peevers	Face to Face Quarterly Meeting	No issues raised pertaining specifically to MCR Life Extension (Agenda item “Future Refurbishment activities & Bruce Power 2016 -2020 Regulatory Overview”	HSM requested that we map out the engagement log/plan	Bruce Power agreed.	Yes – Agenda	Y – Meeting Minutes
23 SEP 2016	HSM Patsy McArthur George Govier Archie Indoe Bruce Power Francis Chua John Peevers	Email from Bruce Power to HSM containing Letter and booklet	No issues raised pertaining to MCR Life Extension, Bruce Power provided an invitation to the Breakfast Session on October 25 th and the Webinar on December 6 th engagement activities.	Nothing specific at this time	N/A at this time	Yes, Letter and Booklet “Bruce Power’s Role in Ontario: The Road Ahead”	Y

03 OCT 2016	HSM George Govier Bruce Power John Peevers	Email from HSM to Bruce Power	Acknowledgement of Invitation to October 25th engagement session in Kincardine. Indication that December 6 th might better serve current purpose to acquire relevant information.	Nothing specific at this time	N/A at this time	N	Y
13 OCT 2016	HSM George Govier Ben Indoe Ross Lamont Wayne Longe Patsy McArthur Goldie Mielhausen Carolyn Myers Boone Bruce Power Francis Chua Emily Johnston John Peevers	Face to Face Quarterly Meeting	<ul style="list-style-type: none"> • Discussion on Future Refurbishment Activities for Bruce A and Bruce B (Major Component Replacement) – Bruce Power spoke to the letter HSM received pertaining to Major Component Replacement and also provided hard copies of the MCR publication. • Bruce Power committed to sending HSM an electronic and Hard copy of the ERA sometime in 2017, likely towards the end of the year. The Hard copy will have minimal lag time to the electronic copy. It is important to note though that the CNSC will receive the ERA prior to HSM receiving it, however this does not prevent us from discussing the content. 	Nothing specific at this time.	N/A at this time	Yes- hard copies of the Road Ahead publication	Y – Meeting Minutes

11 NOV 2016	HSM George Govier Patsy McArthur Bruce Power John Peevers	Email from Bruce Power to HSM providing invitation to Webinar	Bruce Power extending invite to December 6 th Webinar, as HSM had indicated interest in potentially attending.	Nothing specific at this time	N/A at this time	Yes – invitation	Y
15 NOV 2016	HSM George Govier Bruce Power John Peevers	Email from HSM to Bruce Power	HSM indicating appreciation of invitation to Webinar on December 6 th however they have a previous commitment at the same time and will be unable to attend.	Nothing specific at this time	N/A at this time	N	Y
16 DEC 2016	HSM George Govier Patsy McArthur Bruce Power John Peevers Francis Chua	Email from Bruce Power to HSM providing a letter and update to the 5 year look ahead	Letter outlines a few key accomplishments of 2016, also provides a link to the webinar recording, and an update to the 5 year look ahead, and request to meet in January for Q1 meeting.	Nothing specific at this time	N/A at this time	Yes – letter and 5 year look ahead	Y
19 DEC 2016	HSM George Govier Bruce Power John Peevers	Email from HSM to Bruce Power acknowledging receipt of 5 year look ahead	HSM indicated appreciation on letter from Francis, and provided a few dates in January that would work for quarterly meeting.	Nothing specific at this time	N/A at this time	N	Y

17 FEB 2017	<p>HSM Pasty McArthur George Govier Carolyn Myers Boone Goldie Mielhausen Ben Indoe Ross Lamont</p> <p>Bruce Power Maury Burton (guest/presenter) Francis Chua Emily Johnston John Peevers</p>	Face to Face Quarterly Meeting	Bruce Power Maury Burton provided a detailed presentation on the MCR Life Extension, what is going to happen, the licence process and key timelines	HSM asked Bruce Power to provide an update Engagement Log, as this topic has been discussed for quite some time and this meeting was not the first.	Bruce Power indicated that they would draft the log and provide it to HSM for review and input.	Y-Presentation on MCR Life Extension titled "Licensing Update February 17, 2017"	Y – Meeting Minutes
04 July 2017	<p>HSM Patsy McArthur George Govier Carolyn Myers Boone Goldie Mielhausen Ben Indoe Ross Lamont</p> <p>Bruce Power John Peevers Francis Chua Alexandra Stephenson</p>	Face to Face Quarterly Meeting			<p>Bruce Power indicated that Application for Licence Renewal, including Major Component Replacement at Bruce A & B would be made in 2018 requesting a 10 year licence instead of 5 year.</p> <p>Draft Application documents would be delivered to HSM hard copy by late July/August.</p>		Y – Notes on Meeting by HSM
28 July 2017	<p>HSM George Govier</p> <p>Bruce Power Emily Johnston</p>	Email from Bruce Power to HSM providing a letter related to Application for Renewal of Bruce Power's Reactor Operating Licence				Y- letter related to Application for Renewal of Bruce Power's Reactor Operating Licence, and Draft Engagement Plan for discussion purposes.	Y

28 July 2017		Hand - delivered				<p>Yes – hard copies of: 1) Letter-June 30, 2017 Application for the Renewal of the Power Reactor Operating Licence, with attachments 2) Letter-June 30, 2017 Supplement to the Application for the Renewal of the Power Reactor Operating Licence: Major Component Replacement Project Execution Plan and Bruce B Unit 6 Return to Service Plan 3) Letter-June 30, 2017 Supplement to the Application for the Renewal of the Power Reactor Operating Licence: Updated Environmental Risk Assessment that includes Major Component Replacement,</p>	Y
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						with attachments 4) Letter-June 30, 2017 Supplement to the Application for the Renewal of the Power Reactor Operating Licence: University Research Summary, with attachments 5) Letter-June 30, 2017 Supplement to the Application for the Renewal of the Power Reactor Operating Licence: Whitefish Research Review, with attachments.	
05 Sept. 2017	HSM George Govier Bruce Power Emily Johnston	Email from Bruce Power to HSM providing information related to the Application for Renewal of Bruce Power's Reactor Operating Licence, including the CNSC Participant				Yes - information about CNSC Participant Funding Program and proposed dates for 2- part Public Hearing.	Y

		Funding Program.					
25 Sept. 2017	HSM Patsy McArthur George Govier Carolyn Myers Boone Goldie Mielhausen Bruce Power Francis Chua Clementina Consens	Face to Face Quarterly Meeting			Bruce Power advises that an Environmental Risk Assessment (ERA) Update related to Major Component Replacement (MCR) would be submitted in October and become available to HSM in November. Bruce Power informed that Public Engagement Sessions will involve webinars and public meetings in Kincardine and Port Elgin.	Yes – Provided copies of “Bruce Power’s 2018 Licence Renewal Briefing”.	Y – Notes on Meeting by HSM
25 Sept. 2017	HSM George Govier Bruce Power Francis Chua	Email from Bruce Power to HSM providing information about Public Engagement Meetings and webinars related to licence renewal activities.				Yes – Provided information about “Bruce Power’s Licence Renewal Process and the Life-Extension Program”.	Y
24 Oct. 2017	HSM George Govier Bruce Power Emily Johnston	Email from Bruce Power to HSM providing information related to the Participant Funding Program.				Yes – information about CNSC Participant Funding Program including Application Form.	Y

10 Nov. 2017	HSM George Govier Bruce Power Emily Johnston	Email from Bruce Power to HSM requesting meeting to discuss Engagement Plan.				Yes – Letter and Draft Engagement Plan of July 28, 2017 for discussion purposes.	Y
08 Dec. 2017	HSM George Govier Bruce Power Francis Chua	Email from Bruce Power to HSM providing an update to the Licence Renewal Application				Yes – “Summary of the Bruce Power Environmental Risk Assessment” and links to the ERA Update submitted to CNSC Dec. 7/17.	Y
12 Dec. 2017	HSM Patsy McArthur George Govier Carolyn Myers Boone Chris Hachey Ben Indoe Ross Lamont Bruce Power Francis Chua John Peevers	Face to Face Quarterly Meeting	HSM confirmed that it had completed review of application documents provided to-date.	HSM stated that it is interested in flora, fauna, fish, harvesting, economic employment and training opportunities. HSM anticipates that a written submission to CNSC may be required.	Bruce power stated that it wants to map out future events in the Engagement Plan related to Licence Renewal.		Y – Notes on Meeting by HSM
21 Dec. 2017		Hand-delivered				Yes – hard copy of updated “Bruce Power Environmental Quantitative Risk Assessment dated Oct. 18/17.	Y

12 Jan. 2018	HSM George Govier Bruce Power John Peevers	Email from Bruce Power to HSM providing notice for Licence Renewal Events				Yes - Provided notice and dates for Community Face-to-Face Engagement Sessions, and Information Webinar.	Y
15 Jan. 2018	HSM George Govier Bruce Power Francis Chua	Email from Bruce Power to HSM requesting meeting to discuss Engagement Plan.					Y
17 Jan. 2018	HSM George Govier Bruce Power John Peevers	Email from Bruce Power to HSM providing invitation for Licence Renewal Workshop				Yes - Provided notice and invitation for Licence Renewal Workshop to be held Jan. 29/18.	Y
19 Jan. 2018	HSM George Govier Bruce Power John Peevers	Email from HSM to Bruce Power		HSM advises that 3 staff are registered for the Webinar on Jan. 31, 18.		N	N
19 Jan. 2018	HSM George Govier Bruce Power Francis Chua	Email from HSM to Bruce Power	HSM sends Bruce Power a draft copy of the HSM Engagement Plan and Log regarding MCR, Life Extension and Licence Renewal			Yes - Provided copy of the HSM Engagement Plan and Log	Y
25 Jan. 2018	HSM George Govier Carolyn Myers Boone Chris Hachey Bruce Power Francis Chua Emily Johnston	Face to Face Meeting	Bruce Power provided for discussion, a Draft copy of the BP Engagement Plan with HSM regarding MCR, Life Extension and Licence Renewal. Bruce Power presented a	Further discussions took place regarding upcoming CNSC Public Hearings. HSM noted they were planning a Community Meeting to discuss / receive feedback regarding BP		Yes - Copy of Bruce Power Draft Engagement Plan with HSM. Copy of the letter to HSM	

			<p>letter to HSM Council and a copy of the document "Bruce Power Indigenous Community Interests – Historic Saugeen Metis" that was sent to CNSC. The report further documents the historic and current engagement with HSM regarding past, present and future operations at BP.</p> <p>Bruce Power outlined Phase 2 of the Community Engagement Plan and invited HSM to attend a Licence Renewal/MCR webinar on Jan. 31, 2018.</p>	<p>Licence Renewal/MCR. Bruce Power offered to supply a series of fact sheets for the community meeting.</p>		<p>President and the "Bruce Power Indigenous Community Interests – Historic Saugeen Metis" document dated January 24, 2018.</p>	
31 Jan. 2018	<p>HSM George Govier Carolyn Myers Boone Chris Hachey</p> <p>Bruce Power (Webinar)</p>	Bruce Power Webinar		<p>HSM staff participated in a webinar presented by Bruce Power regarding Licence Renewal/MCR.</p>		N	N
14 Feb. 2018	<p>HSM Patsy McArthur George Govier Carolyn Myers Boone Chris Hachey Goldie Mielhausen Jenna McGuire</p> <p>Bruce Power Francis Chua John Peevers Emily Johnston</p>	Face to Face Quarterly Meeting	<p>Bruce Power acknowledges the copy of the Draft Licence Renewal Engagement Plan and Log dated January 19, 2018 as prepared by HSM.</p> <p>Bruce Power provides a USB memory stick copy of the Thermal ECA Application for review by HSM. BP acknowledged that the application will be for a 10 year period.</p> <p>Bruce Power provided updates regarding the Fisheries Act Application, noting that the application would be submitted in the spring. Consultation</p>	<p>HSM acknowledged that CNSC sent an email to inform HSM regarding the Public Hearing dates and opportunities to participate.</p> <p>CNSC also provided HSM with a copy of the Commission Member Document dated February 12, 2018. HSM notified BP that they anticipate making a written and oral submission at the CNSC Public Hearing in May.</p> <p>HSM also notifies BP that a Community</p>	<p>HSM will review the updated information regarding the Bruce Power Thermal ECA and respond back.</p>	<p>Yes - Bruce Power provided copies of 14 different Fact Sheets to be made available at the upcoming HSM Community Meeting and Open House</p>	<p>Yes – Notes of the meeting by HSM</p>


			<p>regarding the Truax Dam removal offset project will also begin in the early spring.</p> <p>Bruce Power also updated HSM regarding the Old Water Treatment and Four Unit Outage Discharge noting that the application will be submitted for these projects later in the year.</p> <p>Bruce Power will continue to consult with HSM on all of the above projects as new information becomes available.</p>	<p>Luncheon session will be planned to inform the HSM Community about the BP Licence Renewal with an opportunity for questions and comments.</p>			
06 Mar. 2018	<p>HSM Patsy McArthur George Govier Carolyn Myers Boone Chris Hachey Shirley Moulton Goldie Mielhausen</p>	<p>HSM - Community Luncheon and Open House – Topic: Bruce Power Licence Renewal.</p>		<p>HSM Lands, Resources and Consultation staff delivered an oral presentation regarding Bruce Powers Application for Licence Renewal. The presentation provided a summary of the application details and the key issues that have been discussed during Consultation and Engagement with Bruce Power since December, 2015. An opportunity for questions and comments followed.</p>	<p>Community Members commented that continued environmental monitoring and engagement with Bruce Power and HSM was important.</p>	<p>Yes - Fact sheets/Information handouts provided by Bruce Power and the Canadian Nuclear Safety Commission.</p>	

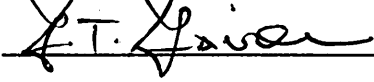
Engagement Plan Template

Name of Proponent: Bruce Power
Major Component Replacement Life Extension and Licence Renewal

Name of Affected Party: Historic Saugeen Metis

When will you be engaging? What is the trigger for engagement? Triggers may be regulatory (e.g. renewals, amendments, assignments) and/or project based (e.g. determining locations, changes in project design, updates to a particular plan, etc.)	What is the purpose of engaging? In relation to the trigger, what will you be discussing (e.g. updates to design or plans etc.)	Who will be engaged at each of these stages? The people engaged at each stage may vary depending on what is being discussed.	How will you engage? Which engagement methods will be used? (eg. Written notification, face-to-face meetings, community public meetings)
Engagement is ongoing with respect to Bruce Power's upcoming licence renewal application. This licence is being requested for 10 years and is intended to include conditions that allow for Major Component Replacement Life Extension	To keep HSM informed on Bruce Powers role/ actions pertaining to licence renewal and Major Component Replacement Life Extension.	Bruce Power will engage the Historic Saugeen Metis Council members and designated HSM staff members.	Bruce Power will continue with written communication as well as face-to-face meetings. Bruce Power can provide information at an HSM community meeting if required. Bruce Power will provide informational updates and answer all questions to the best of their ability.

Signature of Proponent (representative)²:  Date: March 28, 2018

Signature of Affected Party (representative)²:  Date: March 28, 2018

Rev: March 6, 2018

² These Signatures represent agreement on the contents of the log and record, but do not necessarily imply that the parties agree on the topics that were discussed.

APPENDIX B

LETTER OF SUPPORT

**Historic Saugeen Metis
Written Submission to
Canadian Nuclear Safety Commission**

**Licence Renewal Application
Bruce A and B Nuclear Generating Stations
Bruce Power Inc.**

**Bruce Nuclear Site
Tiverton, Ontario**



Historic Saugeen Métis
204 High Street
Southampton, Ontario
N0H 2L0
Direct Line (519) 483-4000
Fax (519) 483-4002

April 11, 2018

Our File: Bruce Power-
Licence Renewal
2018

Your File:

Francis Chua
Department Manager
Environment & Sustainability
Bruce Power
P.O. Box 1540
177 Tie Road
RR 2 Tiverton, Ontario
N0G 2T0

Dear Mr. Chua,

**Re: Bruce Power Inc. Licence Renewal Application
Bruce A and B Nuclear Generating Stations
Historic Saugeen Metis – Letter of Support**

Historic Saugeen Metis (HSM) Council has reviewed and considered information about the Application – Bruce Power Inc. Licence Renewal Bruce A and B Nuclear Generating Stations - which was presented to our staff in a series of consultation and engagement events commencing in December 2015. These consultation and engagement events are summarized in the “ Engagement Plan and Log: Major Component Replacement (MCR) Life Extension and Licence Renewal” for Bruce Power and Historic Saugeen Metis.

Bruce Power has shared sufficient project information about the Application, and in particular the following:

- 2015 Environmental Quantitative Risk Assessment (ERA),
- 2017 Environmental Risk Assessment (ERA),
- Annual Environmental Monitoring Program (EMP) reports, and
- 2017 Predictive Effects Assessment (PEA)

to enable HSM and its elected community representatives to assess any potential impacts of the Application on Metis rights and interests. Bruce Power has worked with the HSM and elected community representatives to consider these potential impacts.

The information received from Bruce Power did not identify any Significant Adverse Environmental Impacts or Significant Public Concerns. All potential environmental impacts identified during the exchange of information can be mitigated with known technology.

The consultation and review process has indicated that there are no anticipated adverse impacts to Metis rights, culture or way of life and that the duty to consult has been fulfilled.

We are pleased to notify you of our support for the Application.

Yours truly,



Archie Indoe
President
Historic Saugeen Metis

Enclosure: " Engagement Plan and Log: Major Component Replacement (MCR)
Life Extension and Licence Renewal " for Bruce Power and Historic
Saugeen Metis