



Oral Presentation

Exposé oral

**Submission from
NA Engineering Associates**

**Mémoire de
NA Engineering Associates**

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



March 31, 2018

Canadian Nuclear Safety Commission
280 Slater Street,
Ottawa, ON
K1P 5S9

Subject: CNSC Public Hearing Participation - Bruce Power Inc., Part 2

NA Engineering Associates is a private multidisciplinary engineering firm with five offices across Southwestern Ontario. We established our Kincardine presence in 2007 to provide Bruce Power with local technical expertise and integrate into the supportive communities that can trace their impressive economic developments back to Bruce Power's leadership in safety culture, power generation and local charitable activism. Alongside Bruce Power, we are proud of the positive impact our engineering staff and their families have made to the Tri-County area.


Our Kincardine staff live amongst the workers of Bruce Power with complete trust in their mandates. Due to our unique perspective as a safety-led engineering provider across multiple industries, and a local community member, we are witnesses to the fact that at Bruce Power nuclear safety is everyone's responsibility from the board of directors to the shop floor. No one is exempt from the obligation to ensure Safety First, including their suppliers and service providers - it is clear that safety is Bruce Power's Number One Value.

Potential issues are identified and dealt with quickly and Bruce Power takes very opportunity to continuously learn. Operating experience is highly valued and training, self-assessments, and benchmarking are used to improve performance. There are strong processes in place to identify and correct safety issues in a timely manner, and to develop, implement, and measure the effectiveness of corrective and preventive actions. We have seen our post-project lessons-learned dialogue turn into proactive planning in upcoming work.

A high level of trust is evident and differing opinions are encouraged and resolved in a timely manner and employees are informed of steps taken in response to their concerns. A questioning attitude is maintained by Bruce Power staff to constantly challenge the safety of day-to-day activities. Bruce Power demonstrates excellent housekeeping practices, well-maintained materials and equipment, and good working conditions. All workers are involved and motivated in promoting a healthy safety culture and managers are visible and actively involved in both preventive and reactive safety-related activities.

One tangible example of Bruce Power's commitment to continuous safety improvement is its Fire Training Facility which opened in 2015. As the prime

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consultant, NA Engineering Associates undertook the conceptual, preliminary and detailed design for this world-class 23,000 square foot facility. The \$25 million facility includes a mock-up of a turbine generator which allows firefighters to practice on realistic scenarios. Propane fueled props, producing fire and smoke, simulate a variety of situations, and thermal cameras, located throughout the building, capture video footage and stream it back to a central control room. The facility ensures Bruce Power emergency workers are trained to the highest level and is also used by local municipal fire departments for training. The main building includes a 50-foot tower for high-angle rescue training and there are also a number of outdoor fire simulators including a car, forklift and transformer.

We also commend Bruce Power for its role in proactively engaging with Indigenous communities with a goal of reconciliation. Bruce Power has shown leadership in this area as demonstrated by its gold level standing in Progress Aboriginal Relations program hosted by Canadian Council for Aboriginal Business. Everyone understands that safety, security, and production are closely linked and that the most efficient plants are also the safest plants. Individuals are held accountable for adherence to Bruce Power safety rules and demonstrate a commitment to safety throughout the organization and an understanding of how they contribute to safety goals.

Of equal importance is the robustness of the CNSC decision process on the licensing of major nuclear facilities, which includes a public hearing process. The public hearing gives involved parties and members of the public an opportunity to be heard before the CNSC. While it would be difficult to guard against individual agendas, cultural biases, or organizational motives, the forum allows for all input to be tabled. The CNSC has a well-earned reputation on sorting through the information to focus on the facts. Our communities deserve decisions to be based on facts.

Here are critical facts about the role Bruce Power nuclear plays in Ontario:

- Bruce Power's Conventional Health and Safety Programs have consistently been considered a strength by the CNSC in its annual report card on operations, achieving a rating of Fully Satisfactory (or A+) since 2012.
 - *(Source: Canadian Nuclear Safety Commission)*
- Bruce Power generate 30 per cent of Ontario's electricity at 30 per cent below the average residential price of electricity.
 - *(Source: Independent Electricity System Operator)*
- Bruce Power supports economic growth and jobs. In fact, up to 22,000 jobs across the province are directly and indirectly supported from the Bruce Power site annually.
 - *(Source: [Report from the Canadian Manufacturers and Exporters and Provincial Building & Construction Trades Council of Ontario](#))*

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- Bruce Power keeps hospitals clean and safe throughout Ontario as the world's largest supplier of Cobalt-60 and are now starting to produce medical Cobalt to treat Brain tumors.
 - (Source: www.cleannuclearpowersafehospitals.com)
 - Bruce Power generates clean electricity every day, providing 70 per cent of the additional energy needed since 2003 to phase out the use of coal while cleaning the air and reducing smog days in the Greater Toronto Area from 45 in 2005 to zero in 2015.
 - (Source: *Asthma Society of Canada*)

We fully support Bruce Power's belief that in order to support long term operational needs, the regional network of suppliers must grow and draw upon the talents of the region for the years to come - having qualified permanent staff in our Kincardine office has been a key factor in ensuring success. Because of this knowledge, the call to action by Mr. Mike Rencheck, Bruce Power President & CEO, to vendors wanting to participate in the \$12.8+B spend are being asked to become stakeholders in the journey to safe, clean and reliable power generation through 2064 by opening nearby offices, moving into the area, and upholding Bruce Power's safety record.

Safety is clearly communicated at Bruce Power and the promotion of a healthy safety culture is evident throughout all aspects of the company. It is this fact that enables us to confidently support Bruce Power's 10-year Licence Application.

NA Engineering Associates would like to express our thanks to the Canadian Nuclear Safety Commission for providing an avenue to share our written input. We also look forward to providing an oral intervention on May 30-31, 2018 for the Renewal of Bruce Nuclear Generating Stations A and B operating licence in our hometown of Kincardine, Ontario.

Sincerely,



Eddie Saab
VP, Business Development
NA Engineering Associates Inc.