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Written submission from the Nuclear Energy Institute

Mémoire de la Nuclear Energy Institute

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



MARIA KORSNICK

President & Chief Executive Officer

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April 16, 2018

Ms. Louise Levert Secretariat Canadian Nuclear Safety Commission 280 Slate St., P.O. Box 1046 Ottawa, ON K1P 5S9

<u>Canada</u>

Subject: NEI Support for Bruce Power application for 10-Year Life Extension for Six Nuclear Reactors

at the CANDU Reactor Site in Tiverton, Ontario

Dear Ms. Levert:

The Nuclear Energy Institute (NEI)¹ appreciates the opportunity to express its support for its member Bruce Power, in pursuing a 10-year renewal of its power reactor operating license on its Bruce A and B stations at the CANDU Nuclear Site in Tiverton, Ontario. Life extension projects related to this application are scheduled to begin in 2020.

As the policy organization for the nuclear industry, NEI's mission is to foster the beneficial uses of nuclear technology and to communicate timely and accurate information about nuclear energy. We develop and promote regulatory, financial, technical, legal, and legislative policies affecting our 300+ members. While we do not address the specifics of the Bruce Power license application, NEI is submitting these comments because we support the extension of nuclear plant operating life, once compliance with applicable safety and regulatory requirements has been confirmed.

In the United States, the U.S. Nuclear Regulatory Commission's mature license renewal process has been pivotal in ensuring that safe, reliable, clean air nuclear electricity maintains its important role in our nation's energy mix. The same will be true of the NRC's second (subsequent) license renewal process, which is currently being piloted at a U.S. reactor. The U.S. industry experience has shown that license renewal is a cost-effective way of maintaining nuclear generation. The long-term operation of these plants also has a positive and substantial effect on the economy and other aspects of the local communities where the reactors are located.

¹ The Nuclear Energy Institute is the organization responsible for establishing unified industry policy on matters affecting its members, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, suppliers and nuclear materials licensees, nuclear medicine and radiopharmaceutical companies, companies using nuclear technologies in the agricultural, food, and industrial sectors, universities and research laboratories, law firms, labor unions, and international electric utilities.

Life extension for the CANDU reactors will provide long-term benefits for the local and regional economies. Current data provided by Bruce Power shows that the provincial government's long-term energy plan relies on Bruce Power to provide two-thirds of Ontario's nuclear power in coming decades—30 percent of the province's overall power. Plant life extension is also a source of jobs, tax revenue, and economic growth that utilizes the skill and knowledge of a generation of workers. More specifically, we understand that extending the life of these reactors will sustain 22,000 direct and indirect jobs annually and invest \$4 billion into Ontario's economy through the direct and indirect spending on operational equipment, supplies, materials and labor payroll. Granting this license extension could lead to significant benefits across the province over the next 20 years, including an additional 5,000 direct and indirect jobs annually, up to \$1.2 billion in payroll, and up to \$1.7 billion in annual economic benefit through equipment, supplies and material.

Bruce Power also provides the medical community with needed medical resources, given its long-term commitment to producing radioisotopes for health science research and development. This activity prompted NEI to recognize Bruce Power with a Top Innovative Practice (TIP) Award at the 2017 Nuclear Energy Assembly. That award established Bruce Power as NEI's first member company outside of the U.S. ever to receive this prestigious utility award.

In sum, NEI supports the life extension of the six CANDU reactors based on our expectation that Bruce Power will continue to comply with applicable CNSC regulatory requirements.

If NEI can answer any questions, please contact Pam Cowan, NEI vice president, Nuclear Generation (pbc@nei.org; 202-739-8093), or Jerud Hanson (jeh@nei.org; 202-739-8053).

Sincerely,
Maria Korsnick

Maria Korsnick

c: Dr. Michael Binder, President & Chief Executive Officer, CNSC

Mr. Timothy Berube, Commissioner, CNSC

Dr. Sandor Demeter, Commissioner, CNSC

Dr. Marcel Lacroix, Commissioner, CNSC

Ms. Kathy Penny, Commissioner, CNSC

Ms. Rumina Velshi, Commissioner, CNSC