



**Written submission from  
Énergie NB Power**

**Mémoire d'  
Énergie NB Power**

In the Matter of

À l'égard de

**Ontario Power Generation Inc.,  
Pickering Nuclear Generating Station**

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**Ontario Power Generation Inc.,  
centrale nucléaire de Pickering**

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Request for a ten-year renewal of its Nuclear Power Reactor Operating Licence for the Pickering 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 Pickering

**Commission Public Hearing – Part 2**

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

**June 2018**

**Juin 2018**



**TU 06374**

May 4, 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: Ontario Power Generation Pickering Nuclear Generating Station Power Reactor Operating Licence Renewal, Ref. 2018-H-03**

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 June 26–28, 2018 in Ontario, for the renewal of the Nuclear Power Reactor Operating Licence for the Pickering Nuclear Generating Station (NGS) for a period of 10 years.

NB Power and OPG share a special relationship. As a starting point, our plants are both CANDU technology developed here in Canada. As well, our companies have had a long-standing collaborative relationship, including OPG's involvement in the Point Lepreau return-to-service operations.

The on-going research and development as well as sharing of operating experience and peer team work across nuclear operators undertaken by OPG, NB Power along with other CANDU operators has created continuous improvement in plant, process and human performance including nuclear safety and safety culture. This work is helping us to collectively achieve some of our strongest results ever. It is said that the safest plants are also the best performing. It is of note that the Pickering station achieved some of its strongest performance results ever in its past license period.

#### **Excellence through collaboration**

Collectively, the CANDU industry invests in R&D, mostly here in Canada, through the CANDU Owners Group (COG), to support this continuous innovation and improvement. This is in addition to investment in innovation initiatives undertaken by individual operators.

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Our collaborative industry efforts cover areas of research and information exchange of greatest relevance to stations moving into the later stages of operating life such as obsolescence and asset management and new approaches to maintenance, which we have seen pay off in improved reliability. As well, we work together on nuclear safety, emergency preparedness, fire protection, severe accident management and plant security; all areas that improve performance and continue to ensure safety and security at our plants.

Through COG, we have an opportunity to share years of learnings and operating experience through Operating Experience (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.

This level of collaborative effort within the CANDU industry amongst operators, as well as suppliers, is a model that is often held up as an example worldwide across industries.

### **Employment and skills for the next generation**

Together, we are part of a Canadian nuclear community of tens of thousands of people who are dedicated to ensuring nuclear operations are executed in the best interest of the people we serve. This means reaching for the highest standard possible in our work and striving for innovation in our equipment, processes and activities, every day.

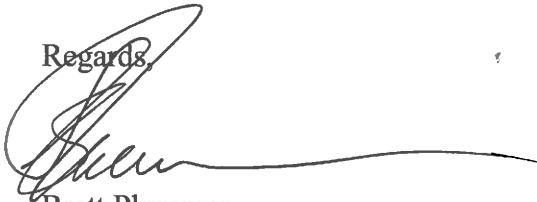
Nuclear power workers train as engineers, environmental scientists, tradespeople, operators and maintainers as well as emergency responders, business people, trainers and communicators. They often spend several years in university, college and apprentice programs before entering the station and then continue their education and training over a lifetime to continuously improve their on-the-job skills and knowledge. As well, each and every employee is committed to doing his or her part to create a safe and secure work environment.

The positive social impact of safe, clean electricity, meaningful employment as well as the economic and social contribution of Canada's nuclear plants cannot be overstated. The Pickering station continues to have a profound positive effect on the community and is helping to prepare a future generation of workers for the innovations and operations that will come after its end of operating life.

As with all Canadian licensees, OPG's Pickering station 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. Through decades of operation, Pickering Nuclear has consistently kept emissions to the environment very low, far below regulatory requirements.

I believe that OPG's Pickering station continues to demonstrate its commitment to a safe and reliable operation. I recommend that the CNSC renew the Pickering Nuclear Generating Station Power Reactor Operating Licence for the next 10 years.

Regards,

A handwritten signature in black ink, appearing to read 'Brett Plummer', with a long horizontal flourish extending to the right.

Brett Plummer  
Vice President Nuclear and Chief Nuclear Officer

BP/KD

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