File / dossier: 6.01.07 Date: 2018-05-07

Edocs: 5528871

Oral Presentation

Exposé oral

Submission from the Canadian Nuclear Laboratories

Mémoire des Laboratoires nucléaires canadiens

In the Matter of

À l'égard de

Ontario Power Generation Inc., Pickering Nuclear Generating Station Ontario Power Generation Inc., centrale nucléaire de Pickering

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



Office of the President

UNRESTRICTED/ILLIMITÉE

File #: 145-CNXX-18-0106-L

2018 May 07

Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

Dear Commission Secretariat:

Intervention Supporting the Application for the Renewal of the Operating Licence for the Pickering Nuclear Generating Station of Ontario Power Generation

On behalf of Canadian Nuclear Laboratories, I'm writing to voice strong support for Ontario Power Generation's (OPG) application to renew the operating licence for its Pickering Nuclear Generating Station for a proposed 10-year licence term. We respectfully request that this intervention be considered in your deliberations to approve the application.

As one of the largest nuclear generating facilities in the world, the Pickering station serves as a critical facility in the delivery of electricity to residents in the province of Ontario. The nuclear power generated represents approximately 14 percent of the total electricity produced in Ontario, which is created safely and virtually free of greenhouse gas emissions, helping Canada meet its climate change targets.

The safe, continued operations of the Pickering Nuclear Generating Station has many important benefits for Ontario and its residents, which includes a reduction in greenhouse gas emissions by an estimated 17 million tonnes, the protection of 4,500 jobs across the Durham region, and savings of up to \$600 million by avoiding more expensive forms of electricity generation. It will also provide much-needed electricity to the Province of Ontario while the Darlington and Bruce nuclear stations undergo refurbishment.

OPG has also demonstrated strong leadership on key technical challenges that benefit nuclear organizations across Canada and help to ensure industry compliance with changing CNSC requirements. Among other accomplishments, OPG co-led a multi-year and multi-phase project to demonstrate the robust safety case for the life extension of fuel channel components; played a major role in the industry response to new Fitness for

Canadian Nuclear Laboratories

Laboratoires Nucléaires Canadiens

Duty requirements in Canada; championed an industry-wide culture of continuous improvement in nuclear safety; and led the ongoing CANDU Owners Group (COG) program which ensures all members have access to a robust suite of industry codes and standards.

Most importantly, OPG operates Pickering with an unwavering commitment to safety. Through decades of collaboration, CNL knows OPG as a responsible member of the nuclear sector, an organization that places an emphasis on safe operations and is dedicated to the health and well-being of the Canadian public, its workers and the environment. OPG has established a strong safety culture at Pickering, centred on continuous improvement, using best practices and organizational experience.

For example, the Pickering Nuclear Generating Station received the highest achievable safety performance rating from the CNSC in 2015 and 2016. This rating reflects improvements in a number of important areas that include operational performance, safety, reliability and human performance. In 2017, Pickering's injury rate was in line with industry best around the world. Overall, the Pickering station has been maintained and safely operated for more than 40 years.

Given this exceptional track record in safe operations, the essential role that the Pickering station plays in electricity generation in Ontario, and the important economic, financial and environmental benefits to Ontario taxpayers, CNL offers its full support to OPG for this licence application.

In support of this letter and OPG's application, CNL would also like to present an oral intervention during the CNSC Pickering hearings in June. If you require any further information, please contact CNL's Chief Regulatory Officer, Shaun Cotnam at 613-584-8291.

Thank you for your consideration.

Yours sincerely,

Mark L. Lesinski

President and Chief Executive Officer

Canadian Nuclear Laboratories