



**Written submission from the
Canadian Council for
Aboriginal Business**

**Mémoire du
Canadian Council for
Aboriginal Business**

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

May 7th, 2018

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

RE: Ontario Power Generation's 10-year License Renewal Application

As President and CEO of Canadian Council for Aboriginal Business (CCAB), I am submitting this on behalf of our national, member-based organization in support of Ontario Power Generation's continued role as a generator of low-carbon, low-cost electricity in Ontario and support for their 10-year License Renewal application.

We understand that the Canadian Nuclear Safety Commission (CNSC) will hold a public hearing on the application by Ontario Power Generation Inc. (OPG) to renew, for a period of 10 years, its power reactor operating license (PROL) for the Pickering Nuclear Generating Station located on the north shore of Lake Ontario in the City of Pickering in the regional municipality of Durham, Province of Ontario. We can appreciate the robustness of the CNSC's licensing-of plants process that is comprehensive and covers 14 separate topics, referred to as safety and control areas, such as radiation protection, emergency preparedness, environmental protection and equipment fitness for service.

The licensing process offers significant opportunities for public participation, and the CCAB is thankful for the opportunity to provide feedback to the Commission regarding this application. We hope you will consider the following as you review their 10-year License Renewal application.

At CCAB, we create opportunities for companies to connect with Aboriginal-owned businesses and to tap into Aboriginal culture as part of their daily operations, whether through job opportunities or seeking partnerships through its supply chain.

OPG has been a champion for CCAB, which is a non-partisan, not-for-profit organization that receives no core government funding and is supported through membership dues, events and sponsorships. OPG is committed to building and growing long-term, mutually beneficial working relationships with Indigenous communities near our current and future operations in Ontario. Their strong commitment to building sustainable Aboriginal

relations through demonstrative leadership continues to underpin their ability to build public confidence. Their relationships with Indigenous communities have laid the groundwork for a series of successful generation development partnerships.

Their partnership with Coral Rapids Power, a wholly-owned company of the Taykwa Tagamou Nation, to build the Peter Sutherland Senior Generating Station on the New Post Creek in Northeastern Ontario. This \$300 million project employed 220 workers at peak and was completed on March 31, 2017 – safely, on budget and ahead of schedule.

In the spring of 2016, they announced a partnership with the Six Nations Development Corporation, a community owned corporation of the Six Nations of the Grand River, to build a 44 megawatt solar generation development at the site of the former Nanticoke Thermal Generating Station on Lake Erie.

CCAB's Progressive Aboriginal Relations (PAR) program, which is a certification that confirms corporate performance in Aboriginal relations at the gold, silver and bronze levels. PAR certification provides a high level of assurance to Aboriginal communities because the designation is supported by an independent, third-party verification of company reports. In 2017, OPG was awarded its second silver designation for Progressive Aboriginal Relations (PAR) by the Canadian Council for Aboriginal Business (CCAB). This level of recognition handed out by the CCAB and OPG is one of 8 companies in Canada to receive it. The designation signals to communities that they are good business partners, great places to work and committed to prosperity in Aboriginal communities.

During the current license term, Pickering NGS has continued to demonstrate strong conventional safety performance that is in the industry's top quartile. This is evidenced by their continual industry recognition which includes the Canadian Electricity Association's President's Gold Award of Excellence for Employee Safety in recognition of the company-wide All Injury Rate and Accident Severity Rate performance for 2013, 2014 and 2015.

Furthermore, in each of 2015 and 2016, the station received the CNSC integrated plant rating of Fully Satisfactory (the highest rating from the regulator) based on the CNSC's evaluation of the 14 Safety and Control Areas.

OPG is particularly mindful of its social license and the need to ensure protection of the public and the environment. OPG has an extremely strong track record in this area. OPG continues to demonstrate that the radiological releases into air and water from Pickering reactor operations are at levels that are far below regulatory limits and hence are protective of public health and the environment. The environmental monitoring program regularly

samples water, air, and soil to ensure that both radiological and non- radiological emissions remain at safe levels.

It is for the above stated reasons that CCAB offers its support for OPG's 10- year License Renewal application and their continued role in the Long Term Energy Plan.

I thank you for the opportunity to provide input to the process and I commend the CNSC for embarking on this important process.

Sincerely,



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President & CEO

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