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Oral Presentation

Exposé oral

**Written submission from the
CANDU Owners Group**

**Mémoire du
Groupe des propriétaires de CANDU**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

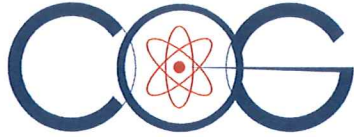
Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

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17 January 2020

Canadian Nuclear Safety Commission
c/o Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P. O. Box 1046
Ottawa, ON K1P 5S9

Email: cns.interventions.ccsn@canada.ca

Subject: BWXT Operating Licence Renewal (Ref. 2020-H-01)

Dear Ms. Levert,

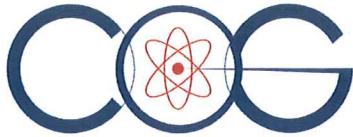
I am writing on behalf of the CANDU Owners Group (COG) in support of BWXT Nuclear Energy Canada Inc.'s (BWXT's) application seeking licence renewal for the Toronto and Peterborough facilities for a period of 10 years. I also wish to indicate COG's interest in attending the hearing on March 2nd and 3rd at the Toronto location to provide an oral presentation. Rachna Clavero, Deputy CEO of COG and I will represent our organization and Rachna will make a presentation to elaborate on the points below.

Engaged Supplier and Partner in Providing Clean Energy

COG is a member organization founded in 1984 to pool resources, collaborative research and information exchange amongst CANDU operators in seven countries. Given the increasing role suppliers are playing at CANDU plants, including projects like Ontario's refurbishment and major components replacements, there is continued recognition that utility success depends on suppliers striving for the same high standards of human performance, product quality and nuclear safety culture. In 2004, a Supplier Participant program was created through COG in recognition of the important role suppliers and contractors play in the nuclear industry and in safe and effective operation and projects.

BWXT has been an engaged supplier who is committed to safety for the CANDU industry in the area of fuel fabrication, fuel bundle assembly, and fuel handling and engineered solutions. In 2005, BWXT became one of the first suppliers to join the COG Supplier Participant program, helping to shape this program over the years.

In 2014, the President of BWXT Nuclear Energy Canada challenged COG to enhance its Supplier Participant Program. As a result, the COG Supplier Participant program evolved and now it provides opportunities for information exchange, training and interaction between



operators and suppliers to strengthen common understanding of expectations, issues and opportunities. The Supplier Participant program also provides an opportunity for shared programs that strengthen and secure the entire CANDU supply chain. This is accomplished through collaboration in developing best practices and shared experience for supply chain management activities.

Commitment to Safety Culture and Human Performance

Through the Supplier Participant program, BWXT is working alongside its other supplier partners to lead initiatives to improve knowledge on topics including workplace safety and security, human performance and nuclear safety culture.

For example, as a member of the Human Performance Metrics Task Team, BWXT has contributed towards development of a set of supplier human performance metrics guidance and principles. They further participated in delivery of this guidance to the supply chain community, demonstrating their commitment to ensuring a high standard for human performance across the supply chain.

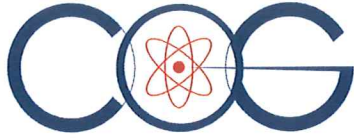
In 2019, COG developed the Supplier Participant First Line Supervisor training course, targeted at First Line Supervisors who provide day-to-day direction and supervision to staff within a nuclear context. This program has 2 primary objectives:

- 1) Demonstrate the ability to provide effective supervision using specific techniques; communicate clearly, recognize and mitigate error precursors and risks, assign tasks, promote teamwork, mentor, observe work being performed, coach and provide feedback.
- 2) Demonstrate an understanding of leadership attributes associated with a strong safety culture and the importance of error prevention.

Three courses were delivered in 2019. BWXT enrolled 17 participants in this training, further demonstrating their active effort to ensure a strong nuclear safety culture throughout their organization.

Continuous Improvement, Training, and Development

Over the years, BWXT has consistently been one of the top three contributors of operating experience COG's Supplier Participant meetings. In sharing operating experience and lessons learned, they encourage a culture of continuous improvement that supports nuclear safety and improved performance at the stations. Importantly, by sharing their own operating experience, BWXT allows other suppliers, including competitors to BWXT, to take pre-emptive action to avoid repeat events. Evidently, BWXT is placing the nuclear safety performance of the industry as its overriding priority.



BWXT has also been a strong participant in the training and development courses offered through COG. In addition to the First-Line Supervisor training, their commitment to developing a strong set of leaders across their organization is seen through their participation in the Nuclear Professional Development Seminar. This seminar is a three-week course for senior plant staff to benchmark and learn best practices in leadership and management. Through case studies and industry experience, attendees review management issues and solve real problems encountered in nuclear plants. They are offered ongoing support and mentorship from industry leaders along with their in-class learning and visits to high-performing nuclear stations. Since 2015, BWXT has put ten of their senior leaders through this course.

In summary, it is through engaged suppliers like BWXT, who are dedicated to continuous improvement, a strong nuclear safety culture, and furthering learning and development across the industry that the CANDU Owners Group continues to support excellence in operating performance at nuclear stations worldwide.

The CANDU Owners Group supports BWXT's application for a license to continue operations at its facilities in Toronto and Peterborough. We look forward to elaborating on aspects of this letter at the presentation in March.

Sincerely,

A handwritten signature in blue ink, appearing to read 'F. Dermarkar', followed by a period.

Fred Dermarkar, P. Eng.
President and CEO

FD:bb

cc: Rachna Clavero, Deputy CEO