



**Written submission from  
Ontario Power Generation**

**Mémoire d'Ontario  
Power Generation**

In the Matter of the

À l'égard de

**Canadian Nuclear Laboratories,  
Douglas Point Waste Facility**

**Les Laboratoires Nucléaires Canadiens,  
installation de gestion des déchets de  
Douglas Point**

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Application to amend the waste facility  
decommissioning licence for the Douglas  
Point Waste Facility

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Demande de modification du permis de  
déclassement de l'installation de gestion des  
déchets de Douglas Point

**Commission Public Hearing**

**Audience publique de la Commission**

**November 25-26, 2020**

**25 et 26 novembre 2020**

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October 23, 2020

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

**OPG Intervention on Douglas Point Application for Licence Amendment**

Dear Mr. Leblanc and Commission Members,

The purpose of this letter is to provide Ontario Power Generation's (OPG) written intervention with respect to Canadian Nuclear Laboratories' (CNL) application for amendment of the Waste Facility Decommissioning Licence for the Douglas Point Waste Facility, as described in Commission Member Document CMD 20-H4.1. OPG fully supports the amendment of the CNL licence to proceed with Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities on the Douglas Point site.

Co-operation between OPG and CNL has existed throughout the construction, operation and safe storage phases of Douglas Point. In fact, OPG's predecessor, Ontario Hydro, operated the facility for nearly two decades. CNL has demonstrated quality and commitment to safety throughout the lifecycle of the facility. OPG commends CNL's dedication to excellence and its healthy safety culture which transcends beyond Douglas Point and into managing their other facilities.

CNL's history of excellence makes them a valued member of the nuclear industry. Through sharing of OPEX (operating experience), leading industry workshops, and by demonstrating new and innovative technologies, CNL has become an important contributor to the continued success of the Canadian nuclear industry. CNL's execution of the decommissioning of Douglas Point will provide valuable OPEX for the nuclear industry. OPG looks forward to the lessons learned from this endeavor, for eventual consideration in our own decommissioning plans for OPG nuclear facilities. CNL plays a crucial role in Research and Development in the Canadian nuclear infrastructure. The importance of this work in the development of the homegrown Canadian industry cannot be overstated, and their ongoing work program is critical to the future success of the nuclear industry in Canada.

OPG is confident in CNL's ability to safely execute the upcoming decommissioning activities given the expertise of their group of highly competent nuclear professionals. An important part of sustaining a high quality workforce is a healthy safety culture. It has long been recognized in the nuclear industry and by the CNSC that a healthy safety culture is fundamental to attaining and maintaining high standards of performance.

Safety culture reflects the core values and behaviours of a company's leadership and workers in all aspects of safety, compliance, quality, production and protection of the environment. OPG notes that CNL exemplifies all of the good qualities associated with a healthy safety culture, and applauds their commitment to continuous improvement. For example, as noted in CMD 20-H4.1, CNL conducted a comprehensive safety culture survey in 2019 and continues to enhance it through means of an action plan.

In conclusion, CNL has demonstrated their commitment to safety throughout the lifecycle of Douglas Point, and I am confident they will conduct the decommissioning activities safely and in compliance with regulatory requirements. OPG fully supports the amendment of this licence.

Yours sincerely,

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

Carla Carmichael  
Vice President, Decommissioning Strategy  
Ontario Power Generation Inc.