



**Written submission from
BWXT Canada Ltd.**

**Mémoire de
BWXT Canada Ltd.**

In the Matter of

À l'égard de

**Application to allow the production of
lutetium-177(Lu-177) at the Bruce Nuclear
Generating Station (NGS)**

**Demande de modification de permis visant à
permettre la production de lutécium 177 à la
centrale nucléaire de Bruce**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

June 2021

Juin 2021



May 26, 2021

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
Email: cns.interventions.ccsn@canada.ca

Re: Bruce Power Licence Amendment Application (June 25, 2021 Hearing in Writing)

Dear President and Commission Members,

I am writing on behalf of BWXT Canada Ltd. (BWXT) to express my strong support for the approval of Bruce Power's application for licence amendment of the power reactor operating licence, which was submitted in November of 2020.

BWXT is a longstanding and trusted global supplier of nuclear components, fuel, services and medicine and today operates 10 locations across Canada with approximately 1500 skilled employees.

BWXT has been a supplier to the Bruce Nuclear Generating Station since it began operations in 1977 and remains a key supplier today with the provision of trusted engineering, critical components and field services.

Bruce Power provides more than 30 per cent of Ontario's electricity at 30 per cent less than the average cost to generate residential power. The company's employees have safely and proudly delivered clean, reliable, low-cost nuclear power to families and businesses across the province and life-saving medical isotopes across the globe for decades.

BWXT strongly supports the role Bruce Power plays in the production of critical isotopes. For example, Bruce Power reactors produce longer lived radioactive isotopes, such as cobalt-60, which is used to sterilize single-use medical devices and a range of consumer products.

In addition to producing clean, non-emitting power, which promotes the health of our province, Bruce Power's ability to irradiate source material for the production of life-saving medical isotopes will help meet an ever-increasing demand for use in not only sterilization, but also diagnostic imaging and various treatments.

Medical isotope production, a critical activity where Bruce Power plays a key role, represents one of the many ways in which nuclear science positively impacts Canadians, particularly when it comes to patient health. Further, Bruce Power's role in medical isotope production represents additional benefits, such as the maintenance and expansion of many high-skilled, high-paying jobs that support this critical sector.

BWXT applauds Bruce Power's progress in the production of an Isotope Production System (IPS) with its partner IsoGen. Once operational, IPS will have the capacity to produce a wide variety of isotopes, including Lutetium-177, which is currently used to treat neuroendocrine tumors, and has additional applications for prostate and breast cancer treatments.

Bruce Power has always been a supportive pillar within its host communities and an industry leader in progressive relations with its local Indigenous communities. For example, Bruce Power has partnered with the Saugeen Ojibway Nation (SON) to explore ways of jointly marketing new isotopes in support of the global fight against cancer. As a member of Bruce Power's Indigenous Relations Supplier Network, BWXT can confidently state the Bruce Power is fully committed to meaningful engagement with its local Indigenous communities.

As a longstanding and trusted supplier to Bruce Power, BWXT can attest to Bruce Power's commitment to safe operations, community support, the future of our planet and the health of patients around the world.

It is for these reasons, and many more, that BWXT strongly supports the approval of Bruce Power's application for licence amendment to produce Lutetium-177.

Sincerely,

A handwritten signature in blue ink that reads "John MacCrannie". The signature is fluid and cursive, with the first name "John" being the most prominent.

President

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