



**Written submission from  
Pediatric Oncology Group  
of Ontario**

**Mémoire de  
Pediatric Oncology Group  
of Ontario**

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)**

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

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Public Hearing - Hearing in writing based on  
written submissions

Audience Publique - Audience fondée sur des  
mémoires

**June 2021**

**Juin 2021**

May 25, 2021

Tribunal Officer, Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street  
P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9  
Email: [cncs.interventions.ccsn@canada.ca](mailto:cncs.interventions.ccsn@canada.ca)

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

Dear President and Commission Members,

The Pediatric Oncology Group of Ontario (POGO) works to ensure that everyone affected by childhood cancer has access to the best care and support. For more than 30 years, we have worked with partners like Bruce Power to achieve an excellent childhood cancer care system for children, youth, their families, survivors and healthcare teams in Ontario and beyond.

As POGO Medical Director and Chair of Childhood Cancer Control, and in my clinical and research role as a pediatric radiation oncologist, I understand the importance of visionary leadership in creating a state-of-the-art, evidence-based cancer delivery system for children with malignant disease.

Bruce Power has a proud legacy of supplying life-saving medical isotopes across the globe to keep medical equipment sterilized and assist in fighting disease. Its power reactors have been used to produce longer lived radioactive isotopes such as cobalt-60. With its partner IsoGen, Bruce Power has begun work on a novel, made-in-Ontario, Isotope Production System (IPS) and, in November 2020, submitted a licence amendment application to produce Lutetium-177, which is currently used to treat neuroendocrine tumours and has additional applications for prostate and breast cancer treatments.

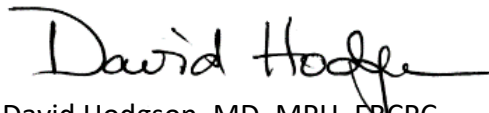
POGO supports the development of improved domestic isotope production, and believes these isotopes will be increasingly important in cancer treatment. Specifically,

- advances in radiopharmacy have made medical isotopes an increasingly important component in the management of cancer patients, including children;

- these isotopes are emerging as a critical component not only in the necessary imaging tests done for cancer patients, but increasingly as a form of treatment; and
- recent experience with COVID vaccine access has illustrated the importance of domestic manufacturing capacity in ensuring that Canadians have optimal access to medically necessary components of treatment.

In so much as Bruce Power will continue to build on its long-standing track record with the successful granting of this licence, POGO trusts that Bruce Power will continue to transform the landscape of cancer treatment in Ontario.

Sincerely,

A handwritten signature in black ink that reads "David Hodgson". The signature is written in a cursive, flowing style.

David Hodgson, MD, MPH, FRCPC

POGO Medical Director & Chair in Childhood Cancer Control

Professor, Department of Radiation Oncology & Institute of Health Policy, Management & Evaluation University of Toronto