



**Written submission from
Ontario Power Generation**

**Mémoire de
Ontario Power Generation**

In the Matter of the

À l'égard de

BWXT Medical Ltd.

BWXT Medical Ltd.

Application for a Class IB nuclear substance processing facility operating licence

Demande pour un permis d'exploitation d'une installation de traitement de substances nucléaires de catégorie IB

Commission Public Hearing

Audience publique de la Commission

June 9-10, 2021

9 et 10 juin 2021

April 30, 2021

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

Re: OPG Intervention in Support of BWXT Medical Ltd. Application for a Class IB Licence (June 9-10 Public Hearing)

Dear President Velshi and Members of the Commission,

Ontario Power Generation (OPG) is pleased to submit this written intervention in strong support of BWXT Medical's Class IB Nuclear Substance Processing Facility Operating Licence Application.

BWXT Medical and OPG share a common set of values, centered on Safety, Integrity, and Social Licence. Both OPG and BWXT Medical are industry leaders with a commitment to protecting its employees, the public, and the environment by working to implement programs and objectives that conserve natural resources, prevent pollution and minimize waste.

OPG has been producing the medical isotope Cobalt-60 at the Pickering Nuclear Generating Station since the 1970s and was the first generating station in Ontario to produce this isotope. In 2020, OPG and Nordion announced a signed agreement to expand production of Cobalt-60 to the Darlington Nuclear Generating Station. Pending CNSC approval, the first harvest of Cobalt-60 from Darlington is expected to be in 2027, during the first planned outage, after completion of the Darlington Refurbishment Project.

In addition, OPG announced that Darlington plans to be the first commercial nuclear power station in the world to produce large quantities of another life-saving isotope, Molybdenum-99 (Mo-99), subject to CNSC approval. Pending CNSC approval of the subject BWXT Class IB licence as well, the Mo-99 produced at Darlington will then be processed by BWXT Medical in order to produce technetium-99 (Tc-99m) generators that can be supplied to radiopharmacies at hospitals across North America. This very important initiative represents a significant innovation that would substantially help in the vital detection of illnesses like cancer and heart disease. While the OPG and BWXT processes require their own licences, the role each company plays and the partnership between us is critical to the success of supplying these essential isotopes.

In addition to collaboration in the medical isotope field, BWXT has also been a long-time partner and design agent for fuel handling and other projects for OPG, including supplying steam generators, re-tube waste containers, spent fuel containers, fuel bundles and feeder assemblies for the Darlington Refurbishment Project.

With all of these extensive areas of collaboration, innovation, and partnership, OPG has high confidence in BWXT's managed systems for safety and security, its culture of integrity and excellence in its current operations, and its life-changing work in the medical isotope field. OPG is confident that BWXT Medical is qualified to undertake the licenced activities under their own Class IB licence and that adequate provisions will be made for the protection of the environment, employees, and the public.

Please accept this letter as Ontario Power Generation's full support of the BWXT Medical Class IB Licence Application. OPG looks forward to the ongoing collaboration, project excellence and life-changing work between our two companies.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Vecchiarelli". The signature is fluid and cursive, with a large initial "J" and a stylized "V".

Jack Vecchiarelli
Vice President
Nuclear Regulatory Affairs
Ontario Power Generation Inc.