



Oral presentation

Exposé oral

**Written submission from
Bruce Power**

**Mémoire de
Bruce Power**

In the Matter of the

À l'égard de

**Cameco Corporation,
Blind River Refinery**

**Cameco Corporation,
Raffinerie de Blind River**

**Application to renew licence for Cameco
Corporation's Blind River Refinery**

**Demande de renouvellement de permis pour
la raffinerie de Blind River appartenant à
Cameco Corporation**

Commission Public Hearing

Audience publique de la Commission

November 24, 2021

24 novembre 2021

October 14, 2021

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

Attention: Canadian Nuclear Safety Commission (CNSC) Tribunal Chair and Commission Members

Re: Bruce Power's Intervention in Support of Cameco Corporation's licence renewal application for its Blind River Refinery Class IB Nuclear Fuel Facility Operating Licence (FFOL) 3632.0/2022

Formed in 2001, Bruce Power is an electricity company based in Bruce County, Ontario. Powered by our people, Bruce Power's 4,200 employees are the foundation of our accomplishments. Our employees are proud of the role that they play in safely delivering clean, reliable, low-cost nuclear power to families and businesses across the province. We have built strong roots in Ontario and are committed to protecting the environment and supporting the communities in which we live.

One of Bruce Power's most significant contributions to environmental protection is the reduction of Ontario's greenhouse gas emissions (GHGs). Nuclear power is a key contributor to Ontario's low-emitting electrical grid and as such is critical to achieving Canada's goal of net-zero GHGs by 2050. While nuclear power generation produces no GHGs, Bruce Power is committed to further minimizing and offsetting emissions from routine undertakings, such as vehicles, machinery, buildings, and equipment, to achieve net-zero GHGs by 2027.

Consistent with Bruce Power's intent to help Ontario keep its air clean, and lead the world in the fight against climate change, we are supportive of Cameco Corporation's application to renew the FFOL for the Blind River Refinery. The Blind River Refinery is the world's largest commercial refinery, processing uranium ore concentrates from uranium mines in Canada and worldwide in order to supply the world with the fuel required to generate clean energy. The Blind River Refinery provides the clean energy that is necessary to meet Canada's Climate Change goals.

With the above as context, we would like to draw your attention to what we view as key elements of the Blind River Refinery FFOL Licence Renewal Application [1.] (see Attachment for more detail):

- I. **Commitment to a Safe, Healthy and Rewarding Workplace:** There have been no adverse effects to human health and safety during the current licence period, both with respect to radiological and conventional health and safety considerations. Radiation exposures have been limited to just a fraction of health and safety limits and lost time injuries have been maintained at zero, during the current licence period. In fact, due to a strong commitment to continuous improvement, the Blind River Refinery has operated for 14 years without a lost time injury.

- II. **Commitment to a Clean Environment:** The Blind River Refinery has been the subject of an Environmental Protection Review (EPR) and an independently executed Independent Environmental Monitoring Program (IEMP). Through the EPR the CNSC has determined that the potential risks from radiological and hazardous releases to the atmosphere, terrestrial, aquatic, geological, hydrogeological and human environments are negligible [2.] The IEMP has also confirmed that any releases of radiological and hazardous contaminants are below the regulatory criteria intended to be protective of human health and the environment.
- III. **Fostering Supportive Communities:** Cameco has employed a variety of tools and media to communicate its activities to key stakeholders, and Indigenous communities. The neighbouring communities are supportive, as demonstrated by a finding of 97% support for Cameco's "continued operations in Blind River" in a recent polling exercise. Cameco has also entered into a Memorandum of Understanding with the Mississauga First Nation, which provides a framework for the effective communication and trust that is being built through regular meetings and compliance reporting.

Given all of the above, it is Bruce Power's opinion that the performance of the Blind River Refinery over the current licence period demonstrates that Cameco is qualified to carry out the activities permitted under the Class IB Nuclear Fuel Facility Operating Licence. With more than three decades of demonstrated safe operation, and a strong commitment to continuous improvement, Cameco Corporation is well positioned to safely operate the Blind River Refinery for another 10 year licensing period. Bruce Power therefore supports the recommendation that the Licence be renewed for a period of ten years.

Thank you for the opportunity to share our views on the Blind River Refinery licence renewal application. If upon reviewing this letter you have any questions, please feel free to contact Heather Kleb, Director, Next Generation Nuclear, at 519-386-1671.

Regards,

James Scongack
Chief Development Officer and Executive Vice President, Operational Services
Bruce Power

Attachment

Nuclear power as a key contributor to Ontario's low-emitting electrical grid, is critical to achieving Canada's GHG target of net-zero by 2050. While nuclear power generation produces no GHGs, Bruce Power is committed to further minimizing and offsetting emissions from routine undertakings such as vehicles, machinery, buildings, and equipment, as part of a corporate commitment to achieve net-zero by 2027. Bruce Power's Net Zero 2027 strategy, announced earlier this year, aims to help meet Canada's greenhouse gas targets by identifying and implementing energy and emission-reduction projects in its operations.

Consistent with Bruce Power's intent to help Ontario keep its air clean, and lead the world in the fight against climate change, Bruce Power is supportive of Cameco Corporation's application to renew the Class IB Nuclear Fuel Facility Operating Licence (FFOL) 3632.0/2022 for the Blind River Refinery. By fueling the world's nuclear reactors, the Blind River Refinery is instrumental in providing the clean energy that is necessary to meet Canada's Climate Change goals and ensure that reliable nuclear energy remains an important part of Ontario's low-carbon energy mix.

Given the above context, Bruce Power would like to highlight the following key elements of Cameco's licence renewal application for its FFOL. In line with its vision, values and measures of success, Cameco ensures the health and safety of workers and the public, protection of the environment, and quality of its processes are the highest corporate priorities in all of its activities. In fact, Cameco measures its success in terms of the safety and health of its workplaces, the contributions they make to a clean environment, and the support that they receive from the communities they work in.

I. Commitment to a Safe, Healthy and Rewarding Workplace:

Established in the 1980's, the Blind River Refinery has a well-established occupational health and safety program and a strong safety culture. The radiation protection program has proven to be effective in preventing unreasonable risk to the health and safety of workers, allowing Cameco to maintain radiation exposures below the regulatory dose limits and at just a fraction of the health and safety limits. Similarly, as a result of a strong occupational health and safety program, and a safety culture characterized by a "relentless pursuit to be better", the Blind River Refinery has gone 14 years without a lost time injury.

II. Commitment to a Clean Environment

As is in the case of radiation exposures, the Blind River Refinery has limited its environmental emissions to just a fraction of the regulatory limits. The Blind River Refinery has also exceeded no environmental action levels during the current licence period. Nevertheless, Cameco Corporation is committed to continuous improvement and continually seeks to improve its operations and has updated its Environmental Protection Plan and supporting documents to incorporate the requirements of the CSA N288 series of environmental standards.

III. Fostering Supportive Communities

As a decades old facility, the Blind River Refinery also has an established Public Information Program. Using a combination of traditional media such as radio and print as well as web and social media based communication tools, Cameco has developed what is proving to be a very effective Public Information Program. The effectiveness of these public information and engagement tools and techniques was reflected in an impressive 97% community support of "continued operations in Blind River" during a recent public opinion poll.

Cameco also proactively reaches out to local Indigenous groups, having established a number of agreements with local groups which govern what information these groups receive and when, including notifications regarding any significant events that take place at the refinery. During the current licence period, Cameco has fulfilled its commitment to provide opportunities to engage with First Nation and Metis communities regarding the Blind River Refinery's operations. Cameco has also specifically fulfilled its commitments under the 20210 Memorandum of Understanding with the Mississauga First Nation.

During the past three decades of operation, Cameco Corporation has demonstrated that it is qualified to operate the Blind River Refinery in a manner that is protective of health, safety and the environment. Cameco has also reaffirmed its commitment to:

“take all reasonable precautions to protect the environment and the health and safety of employees and the public, to maintain the security of the facility and the nuclear substances associated with the facility, and the necessary measures to facilitate Canada’s compliance with international safeguards obligations.”

And, given that there are no changes to the activities described in the licence application from the currently licensed activities, there are no anticipated changes to safety, health, the environment or the surrounding communities.

To sum up, there is no increase in scope from the existing licence that was granted by the CNSC in 2012 and Cameco's track record of over three decades of safe operations predicts a strong operational performance into the future. It is therefore Bruce Power's opinion that the Commission should accept the conclusion Cameco is qualified to carry out the activities permitted under the Licence and renew the FFOL for a period of ten years.

REFERENCES

- [1.] Cameco Corporation, Fuel Services Division, 2020. 2022 Licence Renewal Application for the Blind River Refinery.
- [2.] Canadian Nuclear Safety Commission, 2020, Environmental Protection Review.