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**Written submission from the
Canadian Nuclear Association**

**Mémoire de l'Association
nucléaire canadienne**

**Regulatory Oversight Report for
Canadian Nuclear Power Generating
Sites in Canada: 2021**

**Rapport de surveillance
réglementaire des sites de centrales
nucléaires au Canada : 2021**

Commission Meeting

Réunion de la Commission

November 3, 2022

Le 3 novembre 2022

September 16, 2022

Canadian Nuclear Safety Commission
c/o Louise Levert, Registrar
280 Slater St. PO Box 1046
Ottawa, Ontario
K1P 5S9

Subject: Canadian Nuclear Association Intervention on the 2021 Regulatory Oversight Report for Canadian Nuclear Power Generating Sites.

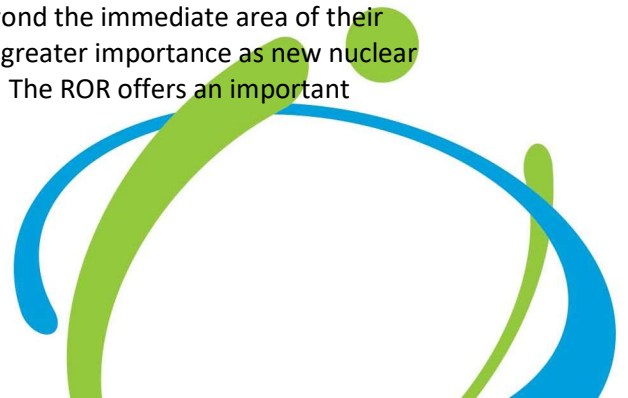
The Canadian Nuclear Association (CNA) has approximately one hundred members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. As such, our members have a strong interest in all applications of nuclear technology including nuclear power generating sites

Nuclear energy is a safe, reliable, and non-emitting source of electricity that plays a vital role in allowing Canada to meet its climate change goals. Ontario's nuclear fleet was the major factor in allowing Ontario to move away from coal fired generation, leading to the single largest reduction in Green House Gas (GHG) emissions in North America. Greater electrification is key to continuing to reduce GHG emissions but only if that generation comes from non-emitting sources. Canada's nuclear power plants are and will continue to be a major component in achieving our climate change objectives while also providing economic benefit to Canadians through high paying jobs.

Notwithstanding the importance of non-emitting electricity, it must be generated in a manner that protects workers, the public and the environment. As the Commission is aware, safety of workers, the public and the environment is the number one priority of the nuclear industry. Canada's nuclear industry takes considerable pride in not only our positive record in health, safety, and the environment but in continually improving our performance across all Safety And Control Areas.

To that end, the CNSC's annual regulatory oversight reports (ROR) provide an important opportunity to inform and engage the public and Indigenous communities. The Commission's decision to allow written interventions and to offer public participation funding is a helpful innovation to enable the CNSC focus on issues that matter the most to the public and Indigenous communities.

The CNA would highlight that the nuclear industry in general and the nuclear power plants in particular, have implemented programs to increase public engagement beyond the immediate area of their operational sites. This increased public engagement will take on greater importance as new nuclear facilities are developed to meet the challenge of climate change. The ROR offers an important



opportunity for First Nations and the public in non-nuclear communities to assess existing operations as they evaluate new nuclear projects.

To help to continually achieve high standards of safety performance expected by the CNSC and the public, Canada's nuclear industry collaborates through formal industry working groups across a variety of technical, programmatic and performance- based aspects of operations. This co-operation allows for the quick sharing of Operating Experience thus ensuring a consistent, timely and robust approach to emerging issues and a consistent approach to the implementation of regulatory standards. This collaborative approach while not unique among industry is further advanced in the nuclear industry than other sectors and the ROR provides an important opportunity to highlight that to the public.

The CNA has reviewed the 2021 ROR and appreciates the thorough and thoughtful input CNSC staff has provided. We are pleased with the recognition of the safe manner that our plants are run and continue to operate while recognizing that continual improvement is an industry wide goal.

In conclusion, the CNA believes the ROR is an important opportunity to provide Indigenous communities and the public with an annual overview of nuclear power plant operations and we thank the Commission for the opportunity to provide our comments.

Sincerely,

A handwritten signature in blue ink that reads "Steve Coupland". The signature is fluid and cursive, with the first name "Steve" and last name "Coupland" clearly distinguishable.

Steve Coupland
Director, Regulatory and Environmental Affairs
Canadian Nuclear Association