



CMD 25-H6.4

Date: 2025-04-22

**Written Submission from
Bruce Power**

**Mémoire de
Bruce Power**

In the matter of

À l'égard de

Nordion (Canada) Inc.

Nordion (Canada) Inc.

Application to Renew Licence for the
Nordion Facility

Demande pour le renouvellement de son
permis pour l'installation de Nordion

Commission Public Hearing

Audience publique de la Commission

June 4, 2025

Le 4 juin 2025

April 27, 2025

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

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

Re: Bruce Power's Intervention in Support of Nordion (Canada) Inc.'s Application to Renew its Class IB Nuclear Substance Processing Facility Licence (NSPFOL-11A.01/2025) for 25 Years

Bruce Power is an electricity company based in Bruce County, Ontario. Our 4,200 employees are the foundation of our accomplishments, including the safe delivery of clean, reliable, low-cost nuclear power to families and businesses across the province, as well as life-saving medical isotopes around the world. We are also aware of the growing global demand for those medical isotopes and are therefore supportive of Nordion's application to renew its Class IB Nuclear Substance Processing Facility Licence (NSPFOL-11A.01/2025).

Bruce Power has been a global leader in medical isotope production for over 35 years, beginning with Cobalt-60 (Co-60), which it produces in partnership with Nordion. Nordion has processed and distributed Co-60 for more than 50 years and, despite supplying as much as 40% of the global market, continues to pursue opportunities to expand its production. Together, Nordion and Bruce Power have driven innovations that will allow Canada to stay at the forefront of the global medical isotope supply, providing stability to this critical health care industry.

Co-60 is an essential radioisotope with many uses in the medical and food industries. Co-60 is used in Gamma irradiation to sterilize single-use medical devices, such as latex gloves, bandages, and swabs for COVID-19 testing, as well as equipment such as scalpels, syringes, and implantable devices. Co-60 is also used in radiation therapy for the treatment of complex brain cancers and conditions, through non-invasive procedures like the Gamma Knife. Through the gamma irradiation of food ingredients, Co-60 also kills the parasites and microorganisms that cause foodborne illnesses, making them safer, reducing spoilage, and extending their shelf life.

Nordion shares Bruce Power's values around the production of clean, reliable electricity and life-saving medical isotopes. Through our round-the-clock production capabilities, our nuclear power plant is uniquely positioned to provide a consistent, reliable source of Co-60 as well as other medical isotopes. As Nordion approaches the end of its licence period (31OCT2025), the application to renew its Class IB licence will help ensure that Canada continues to maintain its long-term supply of Co-60 and that Bruce Power and Nordion continue to be major contributors to the significant health, safety, and social benefits afforded by Co-60.

With that objective in mind, the assessments and analyses completed in support of the Class IB licence renewal application indicate that Nordion can continue to carry out its licensed activities safely. A few of the highlights include:

- **Continuous Improvement** – Nordion's strong track record stems from its commitment to continuous improvement—through its N286-12 compliant Management System—enhancing its facility, equipment, and programs to safeguard the health and safety of people and the environment.
- **Safety Analysis** – Nordion's facility has well-established Safety Analysis and Fire Hazard Analysis Reports which it continues to review and update despite its largely unchanged operations, and the absence of plans to change those operations substantially in the future.
- **Radiation Protection** – Nordion consistently maintains worker and public doses well below the regulatory limits through an established Radiation Protection Program. Radioactive releases are also monitored through its Environmental Protection program to ensure the surrounding environment remains unaffected by its activities.
- **Waste Management** – A particularly notable aspect of Nordion's Co-60 program is its ability to recycle returned Co-60 into new sources. Bruce Power is prepared to accept all the spent Cobalt returned by Nordion, but takebacks have been limited, as Nordion repurposes older Cobalt to moderate the activity of the recently harvested Co-60.

In summary, Nordion has shown that it will not compromise the continued safe operation of its' Class IB facility, ensuring the protection of nuclear safety, public safety and the environment, as well as the international agreements to which Canada is a signatory. They have a decades long history of protecting people and the environment and they communicate these efforts through an established Public Information Program and Indigenous Engagement, which they use to raise awareness of their activities. Bruce Power is therefore supportive of Nordion's application to renew its Class IB licence, to operate their Nuclear Substance Processing Facility for a period of 25 years.

Thank you for the opportunity to share our views on the application. If upon reviewing this letter you have any questions, please feel free to contact Chad MacLean, Senior Director, Business Development and Energy Innovation, at 226-930-0834.

Regards,



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