



CMD 25-H101.3

Date: 2025-05-02

**Written Submission from
Kinectrics Inc.**

**Mémoire de
Kinectrics Inc.**

In the matter of

À l'égard d'

Ontario Power Generation Inc.

Application to amend the Pickering Waste Management Facility to authorize construction and operation of the Pickering component storage structure

Ontario Power Generation Inc.

Demande de modification du permis de l'installation de gestion des déchets de Pickering pour autoriser la construction et l'exploitation de la structure de stockage des composants de Pickering

**Public Hearing - Hearing in writing based
on written submissions**

**Audience Publique - Audience par écrit
fondée sur des mémoires**

July 2025

Juillet 2025



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May 2, 2025

Commission Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario
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Hearing in Writing on Ontario Power Generation's Application to Amend the Waste Facility Operating Licence for the Pickering Waste Management Facility

Dear Commission Secretariat,

The purpose of this letter is to express Kinectrics' support for Ontario Power Generation's (OPG) application to amend the Pickering Waste Management Facility (PWMF) Class IB Waste Facility Operating Licence (WFOL) to authorize the construction and operation of the Pickering Component Storage Structure (PCSS) for the storage of low and intermediate level waste (L&ILW) generated during decommissioning and refurbishment activities at the Pickering Nuclear Generating Station (PNGS).

Kinectrics is a proudly Canadian company committed to sustainable, long-term global growth. We provide complete life cycle management solutions to the electricity industry, working with our customers to fight climate change and save lives through clean electricity generation and medical isotope production. Our headquarters is in Etobicoke, Ontario with offices in Pickering, Toronto, Bruce County, the United States, Germany, Denmark, Romania, the United Kingdom, and India. We operate over 30 laboratories including CNSC-licensed nuclear facilities and employ more than 1,300 staff, 70% of whom have technical, science or engineering degrees. Kinectrics is supported by over 100 companies and consultants on our Approved Suppliers List. Combined with our suppliers, Kinectrics' support of OPG contributes to the employment of thousands of high-quality, knowledge-based jobs.

Kinectrics is committed to the safe operation of nuclear facilities in Canada and around the world. Additional interim storage space for radioactive component waste is required to support the refurbishment of PNGS Units 5 to 8 and PNGS Units 1 to 4 decommissioning activities.



Kinectrics provides a broad range of services to OPG which contribute to the continued safe operation of OPG's facilities. Specific to OPG's application to amend the WFOL for the PWMF, Kinectrics performed safety assessments to support the construction and operation of the PCSS on the PWMF site. These safety assessments included a normal operations safety assessment, malfunctions/accident safety assessment and As Low As Reasonably Achievable (ALARA). Doses to workers and the public were assessed in the normal operations and malfunctions/accident safety assessments, and doses to workers from emplacement activities were assessed in the ALARA assessment. These assessments demonstrate that the estimated dose rates can meet the acceptance criteria.

In providing services to OPG, Kinectrics' staff interface with OPG staff where we have developed long-standing working relationships. This includes approximately 100 Kinectrics staff who work directly at OPG sites. Kinectrics has observed the high degree of attention to detail and rigor that OPG staff exercise in operating their various facilities and is confident that a comprehensive and robust basis has been provided to support the construction and operation of the PCSS on the PWMF site.

Kinectrics is a proud member of the Canadian Council for Indigenous Business (CCIB), which aims to strengthen the relationship between Indigenous and non-Indigenous peoples, businesses, and communities. In this regard, we are pleased to work with OPG, which is also a member of the CCIB and has demonstrated a strong commitment to work towards meaningful engagement with Indigenous peoples and to further Indigenous business involvement in the supply chain. OPG created an Indigenous Opportunities Network (ION) designed to increase the number of Indigenous people working in the nuclear industry by placing them in the building trades on some of OPG's most diverse and innovative projects. OPG also prepared a Reconciliation Action Plan, which functions as a road map for OPG to work in partnership with Indigenous communities, businesses, and organizations to advance reconciliation, and OPG has made meaningful progress on the plan. Kinectrics shares OPG's views in this pursuit and is actively working with Indigenous businesses and Indigenous communities in the regions in which we operate.

In summary, by working closely with OPG over many years and understanding their people, programs, procedures, processes, and safety culture, Kinectrics has observed the commitment to safety and attention to detail which are applied to all OPG projects. Based on these experiences, Kinectrics is confident that OPG has undertaken a rigorous, systematic evaluation to demonstrate that L&ILW will be stored safely in the PCSS without compromising the continued safe operation of the PWMF.



On this basis, we support OPG's application to amend the Class IB WFOL for the PWMF to construct and operate the PCSS. If you have any questions or require clarification, please do not hesitate to contact me at 416.207.6511 or david.harris@kinectrics.com.

Sincerely,

David Harris
President and CEO
Kinectrics Inc.