



CMD 26-H7.4

Date: 2026-07-08

**Written Submission from
E.S. Fox Limited**

**Mémoire de
E.S. Fox Limited**

In the matter of

À l'égard de

Ontario Power Generation

Application to refurbish Pickering Nuclear
Generating Station and to renew licences
for the Pickering Nuclear Generating
Station and Waste Management Facility

Ontario Power Generation

Demande concernant la réfection de la
centrale nucléaire de Pickering et le
renouvellement de ses permis pour la
centrale et l'installation de gestion des
déchets

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

October 2026

Octobre 2026



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July 8, 2026

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

Attention: Senior Tribunal Officer, Commission Registry

Subject: Intervention in Support of the Renewal of the Pickering Nuclear Generating Station Power Reactor Operating Licence and Pickering Waste Management Facility Operating Licence

Dear Tribunal Officer,

On behalf of E.S. Fox Limited (ESFL), I am pleased to provide this letter of intervention in support of Ontario Power Generation's (OPG) application to renew and consolidate the Pickering Nuclear Generating Station (PNGS) Power Reactor Operating Licence (PROL 48.03/2028) and the Pickering Waste Management Facility (PWMF) Waste Facility Operating Licence (WFOL W4-350.00/2028).

The current licences expire on August 31, 2028. OPG has requested an early renewal and consolidation of these licences to provide regulatory certainty in advance of the planned refurbishment and future decommissioning activities, with a proposed licence term from January 1, 2027, to December 31, 2036.

ESFL fully supports this application.

Pickering Nuclear Generating Station

The Pickering Nuclear Generating Station has been a cornerstone of Ontario's electricity system for more than five decades. As one of the world's largest CANDU® nuclear generating stations, its four operating units currently supply approximately ten percent of Ontario's electricity while producing virtually emissions-free power.

The Pickering Waste Management Facility has similarly demonstrated an exceptional operating record, safely managing used nuclear fuel and intermediate-level radioactive waste for more than 30 years while maintaining an outstanding safety performance.

ESFL's Longstanding Partnership with OPG

ESFL has proudly partnered with Ontario Power Generation for decades, providing Engineering, Procurement and Construction (EPC) services, manufacturing, fabrication, maintenance, and project execution across OPG's nuclear and renewable generation fleet.



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Throughout this partnership, our employees have accumulated millions of safe work hours while supporting some of Canada's most significant nuclear projects. These experiences have allowed us to witness firsthand OPG's unwavering commitment to safety, operational excellence, continuous improvement, and responsible environmental stewardship.

Having observed OPG's successful operation of the Pickering and Darlington Nuclear Generating Stations, the successful completion of the Darlington Refurbishment Project, and the continued advancement of Canada's first grid-scale Small Modular Reactor, ESFL has complete confidence in OPG's ability to safely execute the next phase of Pickering's lifecycle.

Safety and Nuclear Excellence

Safety is the foundation of both OPG's and ESFL's organizations.

Our shared commitment is simple: every worker returns home safely every day.

Over many years of working together, ESFL has consistently observed OPG's strong nuclear safety culture, rigorous operational discipline, and commitment to continuous improvement. These values are reflected not only in day-to-day operations, but also in the oversight provided by the Canadian Nuclear Safety Commission and OPG's willingness to continually enhance its management systems and work practices.

The Pickering Nuclear Generating Station has safely generated electricity for millions of Ontarians for decades through the dedication of highly skilled employees who consistently operate to some of the highest regulatory and operational standards in the world.

ESFL has every confidence that OPG will continue to maintain these standards throughout the proposed licence period.

Indigenous and Community Partnerships

One of OPG's greatest strengths is its commitment to the communities it serves.

OPG has established long-standing partnerships with organizations including the Ajax Pickering Hospital Foundation, Whitby Hospice, St. Paul's on the Hill Community Food Bank, Scientists in School, the Toronto and Region Conservation Authority, and the Oshawa and Durham Region Métis Council.

OPG has also demonstrated leadership in Indigenous reconciliation and economic inclusion.

As a member of the Canadian Council for Indigenous Business (CCIB), OPG continues to expand opportunities for Indigenous employment, business partnerships and community engagement through initiatives such as the Indigenous Opportunities Network (ION).



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ESFL is proud to participate in the Indigenous Opportunities Network and has directly benefited through the recruitment and employment of Indigenous tradespeople and professionals. Inspired by OPG's leadership, ESFL has strengthened its own relationships with Indigenous communities by participating in trade fairs, Pow Wows, and community engagement initiatives alongside OPG within Hiawatha and Alderville First Nations.

In addition, OPG continues to invest in Indigenous initiatives, including a sponsorship for the annual Indspire Awards, which recognizes Indigenous excellence.

These actions demonstrate that OPG recognizes its responsibility extends well beyond generating electricity.

Environmental Leadership

OPG has played a critical role in helping Ontario build one of the cleanest electricity grids in the world.

Since Ontario eliminated coal-fired electricity generation, nuclear energy has become one of the province's largest sources of reliable, low-carbon electricity. Organizations such as the International Energy Agency recognize nuclear energy as an essential technology for achieving net-zero emissions by 2050.

OPG has committed to becoming a net-zero company by 2040 and continues to demonstrate environmental leadership through biodiversity conservation and habitat protection initiatives.

Among its achievements:

- Pickering Nuclear Generating Station received the 2021 Environment Award from the City of Pickering.
- Pickering received Gold Wildlife Habitat Council Conservation Certification in 2020 for its biodiversity program.
- OPG Nuclear Operations continues to maintain Gold-Level Wildlife Habitat Council Conservation Certification recognizing excellence in environmental stewardship across its nuclear facilities.

These accomplishments reflect an organization that understands environmental responsibility is fundamental to long-term sustainable operations.

Economic Benefits

The refurbishment of Pickering Nuclear Generating Station represents one of Canada's largest clean energy infrastructure investments.

Upon completion, refurbished Units 5 through 8 will continue providing more than 2,100 MW of clean, reliable electricity for an additional 30 years while supplying power to approximately two million homes and businesses across Ontario.



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The project will also:

- sustain and create thousands of highly skilled jobs across Ontario;
- strengthen Canada's nuclear supply chain;
- generate approximately \$38.2 billion in provincial GDP over the life of the project, including approximately \$17 billion during the refurbishment phase; and
- reinforce Ontario's position as a global leader in nuclear technology, innovation and clean energy.

These benefits extend well beyond electricity generation and will contribute significantly to Ontario's economic prosperity for decades to come.

Closing Remarks

Based on our decades of experience working alongside Ontario Power Generation, ESFL believes OPG has clearly demonstrated the capability, leadership and organizational maturity necessary to continue operating the Pickering Nuclear Generating Station and Pickering Waste Management Facility safely and responsibly.

OPG's exceptional safety performance, operational excellence, environmental leadership, commitment to Indigenous reconciliation, community investment, and proven ability to successfully deliver major nuclear projects provide a compelling basis for approval of this application.

The renewal of these licences will support Ontario's energy security, economic growth, and clean energy objectives while ensuring continued regulatory oversight by the Canadian Nuclear Safety Commission.

For these reasons, E.S. Fox Limited respectfully requests that the Commission approve Ontario Power Generation's application to renew the Pickering Nuclear Generating Station Power Reactor Operating Licence and the Pickering Waste Management Facility Operating Licence for the requested ten-year term.

ESFL appreciates the opportunity to provide this intervention and thanks the Commission for its consideration.

Respectfully submitted,

A blue ink signature of Jamie Lalonde.

Jamie Lalonde
Director of Operations - Nuclear
E.S. Fox Limited

Cc: Spencer Fox, Anthony DeChellis, Pat Cimek, Chris Cimek, Terry Warren