



**Written submission from
EMC Power Canada Limited**

**Mémoire de
EMC Power Canada Limited**

In the Matter of

À l'égard de

**Bruce Power Inc. – Bruce A and B
Nuclear Generating Station**

**Bruce Power Inc. - Centrale nucléaire de
Bruce A et Bruce B**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Bruce A and B Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Bruce A et Bruce B

Commission Public Hearing – Part 2

**Audience publique de la Commission –
Partie 2**

May 28-31, 2018

28-31 mai 2018



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March 5, 2018

SUBJECT: Bruce Power's Relicense Intervention

In response to Bruce Power's application to the Canadian Nuclear Safety Commission for a 10-year operating licence renewal, EMC Power Canada Ltd. (EMC) is pleased to provide our support for this requested licence extension.

EMC has operated since 2005 and is an experienced contractor on Bruce Power's site. EMC offers a wide range of expertise in construction and the ability to provide services including manufacturing, installation, inspection, modification, auditing and maintenance for power generation and distribution in nuclear and non-nuclear applications. EMC's experience and execution of safe and dependable services in project and construction management of multi-trade disciplines, has elevated us as a leader within the Canadian Nuclear Industry.

The importance of this 10-year operating licence renewal to our business is of major significance. A large amount of EMC's business is conducted through Bruce Power and/or through other companies contracted to Bruce Power. Through this business, EMC has grown within the surrounding area and become part of the fabric in our local communities. We have worked hand in hand with Bruce Power over the years to foster economic development, community investment, employment opportunities, Indigenous partnerships, workplace safety, and business partnerships.

In the workplace, EMC has developed full integration with Bruce Power's required departments for upfront planning and for daily interactions. Our construction supervision has vast experience implementing field work on site at Bruce Power, which has allowed us to build a core team with the inclusion of vital positions required to seamlessly conduct work within Bruce Power's organization.



These positions are specific to the nuclear industry and not found in typical construction organizations. Some of these specialized positions include: Safety and Human Performance personnel, experienced Quality personnel, Document Control personnel, Assessors, Greenman, and Clearance Holders/Clearance Holder Supervisors.

We encompass a core team of qualified resources with more than 30 years of experience working at Bruce Power and Ontario Power Generation. We are conducting ongoing work at Bruce Power and currently are mobilized on site with established trades, management and administration teams in place. EMC currently maintains 24 work stations at Bruce Power's site in our 3000 sq. ft. trailer space. With current ongoing contracts on site, we also have a number of work stations at Bruce A, Bruce B and COS.

Our head office is within minutes of Bruce Power to support our on-site operations. We are located at 2091 Highway 21, Kincardine, Ontario and obtain over 85,000 square feet of storage and shop space. This allows for timely project support within close proximity to site. This location conducts our quality management, administration, operations management, and procurement activities. EMC also possesses property in Tiverton, Ontario and additional office facilities in Tiverton.

We are committed to supporting local businesses and our local community. EMC's team employs over one hundred personnel from the Tri-County Area (Bruce, Grey and Huron County), which are within the closest proximity to Bruce Power. This supports the local economy through capacity/demand of goods and services. This stimulates local businesses, as they are benefitting from demand, which in turn, causes a ripple effect in the local area. We have attracted several employees to move to the area permanently, which increases local economic growth through the expansion of the demand for goods and services. This also affects increases in local economic growth in areas such as local school enrollment and other community infrastructure.

In addition, as EMC directly utilizes vendors and subcontractors for equipment rentals, supplying materials, and specialty services, we endorse our local vendors first approach in support of all our projects, which contributes to the local economy. 100% of all EMC business is conducted within the Province of Ontario. For this work, EMC will continue on the current path we are on, which is to support local business and our local community.

Some local community organizations EMC has supported within the last year include the United Way of Bruce and Grey, Saugeen Shores Minor Baseball, The Municipality of Kincardine, Kincardine Soccer Association, Huron Shores Hospice, and the Nawash Community Activator Program (CARA). In addition to providing local organizations with monetary donations, EMC has provided skilled trades to install components for upgrades to community facilities.

EMC is working with Bruce Power to develop an action plan to engage local Indigenous Communities with community participation, employment and business development. We are participating in the Indigenous Relations Supplier Network and the CCAB PAR Program. We employ a Health and Safety Officer, who is also our Indigenous Affairs Representative and a member of the Nawash Community,



with extensive in depth experience with our local Indigenous Communities. Some of the Indigenous Affairs Representative's responsibilities include being a contact and liaison for First Nations communications, utilizing hands-on First Nations experience to foster workplace understanding of Indigenous Affairs, and working as a proponent for the hiring and advancement of Indigenous candidates within nuclear, construction and skilled trades. EMC has designated personnel to develop a Skills Ready Program, whereby Indigenous candidates are mentored through the guidance and support of EMC's designated and specialized team members. This program allows candidates to obtain first-hand experience and knowledge of the various employment opportunities available through the nuclear industry and trade apprenticeships. We are also in the process of negotiating a partnership with SON for the manufacturing of Removable and Reusable Insulation Blankets. EMC supports our local Indigenous Communities and we will continue to develop employment, training and relationships for the progression of our Indigenous Partners.

Our staff observe Bruce Power's core values and principles. Throughout our organization, EMC's staff are committed to providing safe and timely contracting services that consistently meet our customers' requirements and expectations; maintaining a healthy and safe workplace both at our offices and at our customers' work sites; preventing negative environmental impacts and being socially responsible; developing competent and responsible personnel; achieving excellence in Quality, Health & Safety and Environmental performance; seeking, sharing and using lessons learned and experiences from our industry; guiding human behavior; continually improving our Integrated Management System; and complying with applicable legal, customer and industry requirements.

In summation, EMC is an engaged business partner in support of Bruce Power and in support of Bruce Power's application to the Canadian Nuclear Safety Commission for a 10-year operating licence renewal. The importance of this operating licence renewal is of major significance to our business and the future of our operation's success.

Should you require any further information, please contact the undersigned.

Regards,

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