



**Written submission from the  
Ontario Power Generation**

**Mémoire d'  
Ontario Power Generation**

In the Matter of

À l'égard de

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

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

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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**



April 13, 2018

Commission Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street,  
PO Box 1046, Station B  
Ottawa, ON  
K1P 5S9

**Re: Support for Bruce Power's Request to Renew the Nuclear Power Reactor  
Operating Licence for Bruce Nuclear Generating Station A and B**

To the Commissioners,

I am writing today to express full support from Ontario Power Generation (OPG) for Bruce Power's request to renew its Nuclear Power Reactor Operating Licence for Bruce Nuclear Generating Stations A and B.

Bruce Power and OPG have a shared set of values, centred around Safety, Integrity and Nuclear Excellence, and exemplified most of all in our shared safety culture. Together, OPG and Bruce Power generate 80% of Ontario's electricity, while doing so at prices ranging from 30% to 40% lower than the average price of other generators. From either company, the generation of this electricity is more than 99% free of greenhouse gas emissions.

OPG and Bruce Power collaborate in the production of the medical isotope, Cobalt-60, which is important in treating cancer and sterilizing medical equipment, affecting 100 million patients annually. The two companies have shared operational experience in order to improve the production process, and will continue producing medical isotopes from our generating stations, as together we supply half the world's need.

Since the inception of Bruce Power in 2001, OPG and Bruce Power have engaged in an ongoing collaborative approach, as captured in a commercial lease agreement and ancillary agreements. OPG not only leases the Bruce site reactors to Bruce Power, it also buys services from Bruce Power, such as environmental monitoring and site security, while OPG delivers services to Bruce Power such as waste management. Our two companies also recognize our unique position in the Canadian and Ontario nuclear industry. As such, we work closely together in many areas of common interest including safety and security, refurbishment best practices, inspections, engineering, research, benchmarking, and more. Further examples are included below.

Our companies are responsible for the two largest clean-energy infrastructure projects in Canada. To this end, we have been sharing lessons learned from the ongoing Darlington Refurbishment project, in preparation for Bruce Power's Major Component Replacement. This collaboration extends to all areas such as planning, work management, supplier and contractor networks, technology and innovation. In particular, OPG and Bruce Power have

been collaborating on waste management and waste minimization opportunities, within both routine operational wastes and for the upcoming Major Component Replacement wastes.

OPG has a strong working partnership with Bruce Power in the areas of Security, Cyber Security, Fire Protection and Emergency Preparedness through routine operational discussions and information sharing, inter-utility meetings and CANDU Owners Group (COG) working group meetings. We also observe each other's major Emergency Preparedness exercises and share our lessons learned in order to continually learn from each other and improve.

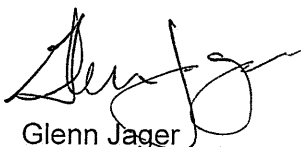
Bruce Power and OPG work cooperatively together and with other Canadian NPPs through COG on analysis and implementation of new Regulatory Documents such as those on Fitness for Duty (both Fatigue Management and Managing Alcohol and Drug Testing). Such cooperative work ensures that the best ideas and practices across the industry are known and available to each licensee, in the interests of maximizing safety in all aspects of our operations.

OPG and Bruce Power also conduct quarterly collaboration meetings on best practices and technologies for Inspection, Maintenance and Engineering. Working groups are established in many areas such as reactor maintenance, radiography, pressure boundary and development of multi-unit probabilistic safety analysis. In Engineering, collaboration occurs in regular benchmarking of life-cycle plans and research into degradation mechanisms. In particular, OPG and Bruce Power have an extensive and ongoing joint project for research and development on aging of fuel channels. This is a multi-year and multi-faceted project covering all fuel channel aging mechanisms, which has successfully demonstrated the safe and reliable fitness for service of these components beyond the current approved service life, and is expected to further demonstrate it through the requested service life.

All of these extensive areas of collaboration help to foster and elevate OPG's high confidence in Bruce Power's managed systems for safety and security, its culture of integrity and excellence in ongoing operations, and its comprehensive planning for the Major Component Replacement.

Please accept this letter as Ontario Power Generation's full support of the Bruce Power request to renew its Nuclear Power Reactor Operating Licence for Bruce Nuclear Generating Stations A and B. OPG looks forward to the ongoing collaboration and sharing between our two companies as we collectively embark on the refurbishment of Ontario's valuable nuclear fleet of reactors, with a continuing focus on safety first.

Sincerely,



Glenn Jager  
Nuclear President and Chief Nuclear Officer  
Ontario Power Generation