Written submission from B.C. Instruments

Mémoire de B.C. Instruments

In the Matter of

À l’égard de

Ontario Power Generation Inc., Pickering Nuclear Generating Station

Ontario Power Generation Inc., centrale nucléaire de Pickering

Request for a ten-year renewal of its Nuclear Power Reactor Operating Licence for the Pickering 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 Pickering

Commission Public Hearing – Part 2

Audience publique de la Commission – Partie 2

June 2018

Juin 2018
May 7, 2018

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

Dear Sir or Madam:

**RE: Pickering Nuclear Generating Station’s Licence Renewal**

**Introduction**
We are a precision machine shop located in Schomberg, Ontario Canada employing 150 people in the manufacture of precision-machined components. We have been in business since 1971 and have been making parts for the nuclear industry since the late 70’s (including Pickering). We fully support the license renewal to 2024 for the following reasons:

**Benefits of Continued Operations at Pickering Nuclear Generating Station**
Continued Operations will reduce greenhouse gas emissions in Ontario by an estimated 17 million tonnes. That’s the equivalent of removing 3.4 million cars per year from Ontario’s roads. And, at 50 dollars a tonne for CO2 that is $850 million in avoided carbon costs. Operating Pickering to 2024 will result in 4,500 direct and indirect jobs across Durham Region. Ontarions will save up to $600 million, the savings over using other forms of generation. Continued operations of Pickering will provide much-needed electricity while Darlington and Bruce Power’s units are being refurbished. Between 2022 and 2024, five units will be offline for refurbishment. Pickering’s operations are essential to providing baseload power for the Province during that time. OPG is investing more than $290 million on continued operations at Pickering, including modifications to ensure the plant remains safe, to modernize plant components essential to plant reliability and safety, and to increase inspections and maintenance of key reactor components, most notably the Fuel Channels.
Safety
The safety of the public and staff is OPG’s top priority. Pickering Nuclear has been maintained and safely operated for more than 40 years. Pickering Nuclear received the highest achievable safety performance rating from the CNSC in 2015 and 2016. The ratings reflect improvements in several key areas including operational performance, safety, reliability and human performance. In 2017 Pickering Nuclear’s All Injury Rate of 0.06 (0.06 injuries per 200,000 hours worked) was in line with industry best around the world. For the first 8 months of the year, there were no worker injuries. This is remarkable for a six-unit site with more than 3,000 employees on site.

Environment
OPG’s power is more than 99 per cent free of smog and greenhouse gas emissions. OPG is committed to environmental sustainability and works hard to minimize our environmental footprint in our site communities. We also work with partners to foster and enhance biodiversity across Ontario.

Communications
OPG maintains open, transparent and regular communications with its host communities. Staff communicate regularly with stakeholders. The community receives newsletters and other mailings regularly throughout the year.

Emergency Preparedness
Together with partners, OPG has distributed emergency preparedness information to residents with the 10km radius of the station each year since 2014. This included safety kits and information, and KI pill distribution. In 2017, OPG and more than 30 partner organizations participated in a large-scale emergency preparedness exercise. As part of this, community stakeholders were invited to join a VIP tour and a communications focus group to observe and provide feedback.

Innovation
Pickering reactors produce Cobalt-60 which is extracted and used in the irradiation and sterilization of single-use medical devices, such as syringes, gloves, implants and surgical instruments.

Indigenous Relations
OPG is committed to building mutually beneficial working relationships with Indigenous communities near its current and future operations. These relationships are built on a foundation of respect for the culture, customs and rights of Indigenous peoples.
Pickering engages with the Williams Treaties First Nations, the Mohawks of the Bay of Quinte, and the Metis Nation of Ontario through ongoing meetings about Pickering’s environmental performance, career fair participation, site tours, and funding for community events.

OPG meets regularly with Indigenous community representatives and members to share information, discuss development initiatives and review planned project activities. To help further the relationship, OPG launched a supply chain initiative in June 2017 in order to encourage Indigenous businesses to participate directly, as joint venture partners or sub-contractors. Contracts now have a 5 per cent minimum Indigenous content requirement, which can be scaled up depending on the size of the contract.

**In conclusion**
We fully support the license renewal for Pickering Nuclear Generating Station until 2024. We have been to the Pickering facility (as well as all other nuclear generating stations in Ontario) and we feel these are the best options for our countries current and future energy requirements. The CANDU technology is the best in the world, we are proud to have been a part of the industry for the past 40 years and we hope to see the technology utilized for generations to come.

Sincerely,

Roger Conzelmann
President
BC Instruments
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