



**Written submission from
EnergySolutions Canada**

**Mémoire de
EnergySolutions Canada**

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



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

Attention: Louise Levert, Secretariat

Subject: Bruce Power Operating Licence extension application for 10 years.

EnergySolutions Canada (ESC) is an ISO-9001 certified company, which operates a 130,000sq/ft CNSC licensed facility in Brampton ON, and storage facilities in Vaughan and Tiverton. ESC has safely and compliantly operated this license for over 30 years. (Initially as Monserco Ltd).

As the Radiation Safety Officer (RSO) for EnergySolutions Canada, we have worked on a variety of projects for Bruce Power since 2005. EnergySolutions Canada performs various functions for Bruce Power, including:

- Volume reduction of radioactive materials
- Shipping of radioactive materials
- Consulting on radiation safety practices
- Decontamination and recycling of low level radioactive materials
- Emergency Response services

There are many aspects of our work that have had an effect on the safe processing and handling of nuclear materials on the site. Bruce Power has been fully supportive and proactive of any safety recommendations, and has never compromised conventional or nuclear safety regardless of budget or schedule.

Bruce Power has gone above and beyond the required basic safety practices, and set standards for constant improvement. This has made them innovators, and leaders in the nuclear industry, as well as in regards to environmental and safety practices. Their use of Human Performance tools to prevent incidents, the practicing of safety drills to ensure smooth recovery in the event of an occurrence and the utilization of experts in their field to monitor daily practices, has created a level of success that speaks for itself. They are viewed in the community as safety leaders, and environmental stewards.

EnergySolutions Canada has provided radioactive waste services to Bruce Power for over ten years. In those ten years we have worked together to complete over 600 cross border and domestic Class 7



shipments of low level dry active waste and liquids. Many of these shipments flow thru the ESC facility in Brampton. These shipments require the expertise of employees from multiple locations, in multiple areas of expertise. These include, experienced Radiation Technicians, Health Physicists, and Crane Operators on Bruce Power's site, to EnergySolutions Canada's Radioactive Material Brokers that create the shipping documents and gain clearances with the Canada/US border. This provides employment to many highly trained and specialized individuals. Once across the border, the receivers of the material at EnergySolutions' Bear Creek Tennessee facility, process the waste with the intent of volume reduction, to return a minimalized waste footprint, which is stored at WWMF. The transportation of this radioactive material is accomplished with the use of PHTS Logistics and Hittman Transport (both wholly owned subsidiaries of EnergySolutions). PHTS Logistics is located in Elmwood ON, and employs staff from the local neighbouring communities. All of these groups come together to make the shipment a success. This work employs multiple specialized fields, and provides economic support to multiple communities in Canada and in the USA.

Bruce Power has maintained a consistent standard of compliance to their internal procedures, as well as compliance to the applicable regulations. Through our years of working with Bruce Power although there has been change over in responsible staff, Bruce Power's succession planning and training ensures replacement of those positions with qualified individuals, who maintain the high level of corporate ethics and compliance, so the quality of work has never wavered.

Bruce Power has demonstrated a systematic and professional approach to security, legislation, and documentation. As we continue to work closely with Bruce Power on the refurbishment program, the expectations have remained the same, and they have not failed to produce high level results.

During EnergySolutions' working relationship with Bruce Power there has been no major radiological incidents, that may have an effect on the environment or members of the public. Bruce Power has an environmental protection program that is fundamental to its operations and the mitigation of environmental risk is fully established within all aspects of operations.

Based on our relationship with Bruce Power and the emerging opportunities arising from the MCR, EnergySolutions Canada has made a corporate decision to increase its local presence in the Bruce, Grey and Huron counties. As such, EnergySolutions Canada acquired PHTS Logistics in Elmwood and a storage facility in Tiverton. EnergySolutions Canada plans to license the storage facility to have radioactive capabilities in support of the MCR. These new ventures will be staffed with employees from



the local communities. Further to its local commitment to Bruce Power, EnergySolutions Canada has become a member of the CCAB and an active member in the IRSN (Indigenous Relations Supplier Network).

Bruce Power actively communicates with the public about the impacts which operations have on the local environment and responds to public concerns with facts and peer reviewed research. Bruce Power also contributes in many ways to the local community and employs a significant local workforce. This coupled with the goods and services that Bruce Power purchases from local business such as EnergySolutions Canada, amounts to a significant portion of the economic health of Bruce County and Ontario. Based on working experience with Bruce Power, we would strongly support the licence for extended operations are approved.

**T J Ryder M.Sc. MSRP
Health & Safety Manager
Radiation Safety Officer**



**An ISO 9001-2008 Certified Company
Registration # CERT-0048537**