



**Oral Presentation**

**Exposé oral**

**Written submission from the  
Canadian Nuclear Association**

**Mémoire de l'Association  
nucléaire canadienne**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**BWXT Nuclear Energy Canada Inc.,  
installations de Toronto et Peterborough**

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Application for the renewal of the licence for  
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les  
installations de Toronto et Peterborough

**Commission Public Hearing**

**Audience publique de la Commission**

**March 2 to 6, 2020**

**Du 2 au 6 mars 2020**

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January 27, 2020

Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
280 Slater St. PO Box 1046  
Ottawa, Ontario K1P 5S9

**Re: Canadian Nuclear Association Intervention Regarding BWXT Nuclear Energy  
Canada's application to renew its Class IB fuel facility operating licence**

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life-cycle of the nuclear industry and as such are supportive of BWXT Nuclear Energy Canada Inc.'s (BWXT) application to renew its Class IB fuel facility operating licence.

Nuclear energy is a safe, clean and reliable source of energy that not only helps Canada meet its electricity needs but is also a critical element in achieving Canada's greenhouse gas emissions targets. Our members provide 60% of Ontario's electricity and approximately 25% of that energy is generated using BWXT fuel which makes its facilities a critical element of Ontario's clean energy plan.

In support of BWXT's licence renewal application, the CNA would like to highlight several key aspects of BWXT's operations:

- BWXT has a long history of safe operations and its number one priority is the health and safety of its employees, members of the public and the environment. This commitment is best seen through the strong performance in all 14 Safety and Control Areas regulated by the CNSC and through BWXT's ongoing commitment to a strong safety culture. BWXT's "Conduct of Operations" document clearly states the company's commitment to maintaining a strong safety culture and explicitly outlines the expected safety culture behaviours. As with all strong safety cultures, BWXT regularly measures its safety culture through self-assessment, outside audits and continuous improvement metrics.



- Like all CNA members, BWXT considers environmental protection a top priority and as such has a stringent and effective environmental management system in place. BWXT's environmental protection program identifies and controls potential environmental risks and drives continuous improvement. During the existing licence period, no environmental action levels or regulatory limits were exceeded and public doses at both the Toronto and Peterborough facilities were a fraction of the public dose limit.
- Environmental Risk Assessments exist to evaluate possible environmental effects of projects and operations. Although there is currently no plan to change the current state of operations, BWXT undertook an ERA to assess any possible effects from possible future production of pellets at BWXT's Peterborough facility. The ERA concluded that radioactive emissions from consolidated operations would be very low and the maximum estimated annual effective dose would be 1% of the CNSC annual public dose limit. In addition, emissions of non-radioactive contaminants would be below Ministry of Environment, Conservation and Parks limits.
- BWXT's Toronto and Peterborough facilities both have an effective and well-established waste program that applies to all hazardous wastes generated on-site, including the management and disposal of that waste.
- As with all nuclear facilities, Security is a priority. Both the Toronto and Peterborough facilities maintain a strong Security program. During this licence period the Toronto facility added a 24-hour, 7 day a week guard presence and a physical guard house at the vehicle entrance. Both facilities include the following security measures:
  - Access control
  - Facility Access Security Clearance Program
  - Security Guards
  - Security Barriers
  - Intrusion detection systems
- Both Toronto and Peterborough facilities have established emergency response plans that describe the roles, responsibilities and actions to be taken in the event of an emergency. In addition, regular emergency response training is received and drills are conducted regularly. During this licence period a major revision was undertaken at the Toronto facility to address areas for improvement identified by CNSC inspectors. This update involved the formation of an Emergency Operations Centre and was tested by four full-scale exercises involving co-ordination with outside agencies.

- BWXT is committed to open communication and public disclosure. BWXT believes the best way to build and sustain public trust and support is by operating in accordance with the highest environmental, health and safety standards and communicating them with the public in an open and transparent way. BWXT does this through a number of activities including:
  - Maintaining a public information website
  - Maintaining update information pamphlets with the most current information about the facilities and activities
  - Issuing public disclosure of events
  - Holding, participating in public/community events and open houses
  - Holding stakeholder meetings and tours
  - Community Liaison Committee meetings

The CNA believes that past performance is the best indicator of future performance. BWXT's high environmental, health and safety standards combined with its commitment to continuous improvement demonstrates that BWXT is a trustworthy and reliable operator and the CNA is pleased to strongly recommend that the CNSC renew BWXT's Class IB fuel facility operating licence for ten years.

Please feel free to contact me directly should you have questions or require additional information.

Sincerely,



Steve Coupland  
Director of Regulatory and Environmental Affairs  
Canadian Nuclear Association