



**Written submission from
Bruce Power**

**Mémoire de
Bruce Power**

In the Matter of the

À l'égard de

Cameco Fuel Manufacturing Inc.

Cameco Fuel Manufacturing Inc.

Application to Renew the Class IB Nuclear
Fuel Facility Licence for Cameco Fuel
Manufacturing Inc. in Port Hope, Ontario

Demande de renouvellement du permis
d'exploitation de l'installation de combustible
nucléaire de catégorie IB pour Cameco Fuel
Manufacturing Inc. à Port Hope (Ontario)

Commission Public Hearing

Audience publique de la Commission

November 23-24, 2022

23 et 24 novembre 2022

October 5, 2022

Canadian Nuclear Safety Commission
280 Slater St., P.O. Box 1046, Station B
Ottawa, ON
Canada K1P 5S9

To: Commission Registry

Bruce Power's Intervention in support of Cameco Corporation's 20-year licence renewal application for Cameco Fuel Manufacturing Inc.

Bruce Power is an electricity company based in Bruce County, Ontario. Our 4,200 employees are the foundation of our accomplishments and are proud of the role they play in safely delivering clean, reliable, low-cost nuclear power to families and businesses across the province and life-saving medical isotopes around the world. Bruce Power has worked hard to build strong roots in Ontario and is committed to protecting the environment and supporting the communities in which we live.

Cameco shares Bruce Power's values of safety first, social responsibility and mitigating climate change. As such, Bruce Power is supportive of Cameco Fuel Manufacturing's (CFM) Class 1B Fuel Facility Operating Licence, FFL-3641.0/2023, renewal application for a period of 20 years and, as part of the application, its request for a change to the production limit.

Cameco's commitment to safety has been demonstrated through six decades of safe operations. Like Bruce Power, Cameco has a strong safety culture, with robust programs, systems and high standards focusing on human performance, training, risk assessments and observations, and radiation protection. In August 2021, CFM achieved three years without a lost time injury (referenced in Cameco Corporation's 20-year licence renewal letter to CNSC, dated October 24, 2021). Internal audits are conducted routinely to ensure compliance and to apply lessons learned where needed. The protection of human health and the environment are key priorities and in its current licence period Cameco has reported public radiation exposures and environmental emissions that have been limited to just a fraction of the regulatory limits.

Cameco shares Bruce Power's dedication to developing and maintaining meaningful connections with local communities, including Indigenous communities. Cameco maintains a robust community investment program, which provides support to community projects and initiatives, with a focus on health, education, youth and community development. Polling conducted in 2022 found 93 per cent of Port Hope residents support Cameco's continued operations and when asked specifically about CFM's application for a 20-year licence renewal, the large majority (82%) were supportive.

As part of our value of social responsibility, Bruce Power is proud to produce life-saving medical isotopes used to sterilize 40 per cent of the world's single-use medical devices and to diagnose and treat various types of cancers around the globe. CFM manufactures the specialized adjuster sets used by Bruce Power to produce Cobalt-60 medical isotopes. As well, CFM fabricated and delivered a unique Target Finger Tube assembly; a critical component in Bruce Power's new production system to produce Lutetium-177 – a medical isotope used in the non-invasive treatment of prostate cancer.

Bruce Power is committed to helping Canada and Ontario reach their 2050 Net Zero greenhouse gas emissions targets and to ensuring a long-term supply of clean, reliable electricity for Ontario homes, businesses, schools and hospitals. We will achieve this in large part through our Life-Extension Program, which consists of our Major Component Replacement Program and Asset Management Plan which will ensure a stable supply of emissions-free power for decades to come. Additionally, Bruce Power is investing in a series of power recovery projects under Project 2030, which will bring our incremental power output to 7,000 megawatts (MW) per year by 2030, helping to fill the energy generation gap. As well, Bruce Power is taking steps to be a Net Zero carbon-emitting company by 2027 by implementing energy and emission-reduction projects in its operations, finding alternatives to high-emission energy sources and, where further reductions are not feasible, pursuing emission offsets.

Cameco is aligned with Bruce Power in our commitment to helping achieve Net Zero by 2050. The fuel used to power Bruce Power's CANDU reactors is exclusively supplied by Cameco. The long-term operation of the CFM facility, along with increased production, is important to the continued success of Bruce Power's Life-Extension Program and to ensuring a clean energy future in Ontario and Canada.

For the reasons stated above, it is Bruce Power's opinion that the performance of the CFM facility over the current licence period demonstrates that Cameco is qualified to carry out the activities permitted under the Class IB Nuclear Fuel Facility Operating Licence and would continue to demonstrate a high level of performance over a 20-year licence period.

While Canadian licence terms tend to be shorter, longer terms are the norm in most international jurisdictions, with terms set for 40 years and in many cases, the life of the facility. Bruce Power understands that there are concerns about whether there will be enough opportunities for meaningful public interactions and discussions around facility operations during longer terms. However, we believe that there will be adequate opportunities for these discussions through the Public Information Program and during public Commission proceedings on the annual Regulatory Oversight Report, mid-term licence reviews and special subject matter agenda items.

Thank you for the opportunity to share our views on the Cameco Fuel Manufacturing Inc. 20-year Licence Renewal application.

Regards,

A handwritten signature in black ink, appearing to read "Pat Dalzell". The signature is written in a cursive, flowing style.

Pat Dalzell
Head of Corporate Affairs
Bruce Power