



Oral presentation

Exposé oral

**Written submission from
Keith A. Miller**

**Mémoire de
Keith A. Miller**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022

Keith A. Miller

Rothesay,
New Brunswick,

March 21, 2022

Secretariat Canadian Nuclear Safety Commission
Senior Tribunal Officer
280 Slater Street. PO Box 1046,
Station B Ottawa, Ontario
K1P5S9
Email: interventions.@cnsccsn.gc.ca

Subject: NB Power Point Lepreau Nuclear Generating Station – Operating License Renewal

Dear Tribunal Officer,

Please accept my letter as a written submission in support of the renewal of the Point Lepreau Power Reactor Operating License. I am also requesting to participate in person for the oral intervention to the Part-2 hearing in support of the renewal.

Although I am now retired, I have been employed most of my working life in the nuclear industry, both in the UK and Canada. I remain a supporter of commercial nuclear and please accept this letter as a balanced submission from an informed Canadian and New Brunswicker. Nuclear power provides a safe and environmental means of generating economic electricity without contributing to greenhouse gas emission and hence climate change.

The Point Lepreau Nuclear Generating Station (PLNGS) has generated safe, clean electricity for the people of New Brunswick for close to four decades, and today supplies more than one third of the electricity used in the province. The comprehensive refurbishment of the Station's major components, completed in 2012, which means it can continue to be a key contributor to the province's clean energy mix well into the future.

CANDU reactors have an excellent safety record and Point Lepreau is a recognized leader in workplace safety. Safety is always the Number 1 priority of station activities. As an example, the station has exceeded one million person-hours without a lost-time accident – three times. In fact, in June 2021, the station surpassed two million hours without a lost-time accident. This accomplishment is thanks to the commitment of every employee at Point Lepreau to a culture of learning, training and procedural adherence, every day, in everything we do.

Point Lepreau is committed to excellence in nuclear safety and plant reliability whilst maintaining a strong safety culture which underpins operations and all daily activities. Station

management place safety as the highest priority which establishes the confidence of both the employees and the public.

Point Lepreau and NB Power continue to be strong and supportive the local community citizens for all New Brunswickers, although special mention must be given to the effort and success with engagement and collaboration of First Nations.

As is the requirements of nuclear utilities Point Lepreau embraces advances in nuclear research, replication of best practice and new regulations. The organization continuously seeks to improve in programs encompassing, equipment reliability, probabilistic safety assessment, fuel channel management, fire protection, safety culture, emergency planning, environmental protection, and physical security.


The advances and support for Point Lepreau can be seen as a reflection of the ethos of NB Power, the NB Power Executive and the corporate organization are aligned to provide through their management system the programmatic support, physical and financial resources to be successful. The commitment to Point Lepreau and to safety is evident from the President and NB Power Board Members, through to the humblest employees, and this ethos of safety is supported by the IBEW37, the recognized trade union of the employees.

Whilst much of a license renewal comprises of a reflective process of assessing past and current performance, we must also understand that Point Lepreau has also undertaken a Periodic Safety Review in compliance with REGDOC 2.3.3 providing an assessment of the future condition of plant and equipment and an assessment against modern codes and standards.

Both Point Lepreau and the Canadian Nuclear Safety Commission share within their respective roles and responsibility to advance nuclear and environmental safety. As we look to future new challenges will need to be addressed, new risk will be identified as science advances or through worldwide operating experience, maybe risks such as cyber security which continues to develop, the quest for increased safety will never end.

In offering this letter of support for license renewal, and after attending public information sessions and living in the Saint John community I remain confident in the safety of Point Lepreau and the effective regulation and oversight offered by the Canadian Nuclear Safety Commission, I believe we are safe today and we will be safe through the future license period.

Sincerely,



Keith A. Miller, BEng, CEng, MIMechE, MINucE, MIMgt