

December 16, 2021

CD# P-CORR-00531-22820

MS. K. CAMPBELL

Director

Pickering Regulatory Program Division

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Ms. Campbell:

**Pickering NGS – Intent to Pursue CNSC Authorization for Operation of
Pickering Units 5-8 through December 2025**

The purpose of this letter is to inform the CNSC of OPG's intent to pursue CNSC approval for operation of Pickering Units 5-8 to the end of 2025.

OPG recognizes the regulatory requirements and expectations regarding the operation of Pickering NGS beyond December 31, 2024, which CNSC staff restated in Reference 1. To summarize, operation of any Pickering NGS reactor unit beyond December 31, 2024 constitutes a change in Pickering's licensing basis and will require Commission authorization. OPG intends to comply with the requirements prescribed in the Pickering NGS Licence Conditions Handbook (Reference 2) Sections 15.1 and 15.4, including notification to the CNSC in writing and no later than December 31, 2022 of the intent to operate the Pickering NGS 5-8 reactor units beyond December 31, 2024. It is also recognized that the Commission will hear such a request at a public hearing during which Indigenous groups, members of the public and stakeholders would be able to intervene.

In anticipation of our submissions in compliance with these requirements, in the coming months some OPG submissions will consider operation of Pickering NGS Units 5-8 beyond December 31, 2024. For example, the submission of the reassessment of the Periodic Safety Review global assessment report will consider operation of the Pickering NGS Units 5-8 through December 2025. Other routine documents and submissions such as major component life cycle management plans and fitness for service assessments will also start considering operation through December 2025, recognizing the change in Pickering's licensing basis has not received Commission authorization. This will prevent rework and resubmission of these items while OPG seeks Commission authorization for operation beyond December 31, 2024.

As recommended in Reference 1, OPG will continue discussions with CNSC staff concerning the Pickering end of commercial operation plans. OPG staff will engage CNSC staff to discuss the scope of the intended proposed licensing basis change and development of detailed plans.

No new regulatory commitments or regulatory management actions have been undertaken as a result of this submission, as indicated in Attachment 1.

Should you require further information, please contact Sara Irvine, Manager Regulatory Affairs, Pickering, at 289-314-3367.



Jon Franke
Senior Vice President
Pickering Nuclear

cc: CNSC Pickering Regulatory Program Division
CNSC Records Office

References:

1. CNSC Letter, A. Viktorov to M. Knutson, "Pickering NGS – Regulatory Requirements for Extending Pickering End of Commercial Operation Beyond December 31, 2024", July 15, 2020 e-Doc 6236099, CD# P-CORR-00531-06098.
2. Pickering NGS Licence Conditions Handbook, LCH-PR-48.00/2028-R04, e-Doc 6432457.

Attachment 1 to OPG Letter, J. Franke to K. Campbell, "Pickering NGS – Intent to Pursue CNSC Authorization for Operation of Pickering Units 5-8 through December 2025", CD# P-CORR-00531-22820

ATTACHMENT 1

Summary of Regulatory Commitments and Regulatory Management Actions Undertaken in this Submission

Regulatory Commitments:

No.	Description	Due Date
	None	

Regulatory Management Actions:

No.	Description	Due Date
	None	