9 November 2018

Mr. M.A. Leblanc
Commission Secretary
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

Subject: BWXT Nuclear Energy Canada Inc. FFOL-3620.01/2020 renewal application

Dear Mr. Leblanc,

As you are aware, the current Class IB Fuel Facility Operating Licence for BWXT Nuclear Energy Canada Inc.'s (BWXT NEC) Peterborough and Toronto facilities (FFOL-3620.01/2020) is scheduled to expire in December of 2020. I am writing to you, as the licence applicant, to request renewal of the operating licence for a period of 10 years.

The address of the Peterborough facility is 1160 Monaghan Road, Peterborough, Ontario and the address of the Toronto facility is 1025 Lansdowne Avenue, Toronto, Ontario.

BWXT NEC produces nuclear fuel bundles used in the Canada Deuterium Uranium (CANDU) fleet to generate clean electricity that powers homes, businesses and the Canadian economy. The Toronto facility is currently licensed to produce natural and depleted uranium dioxide pellets. The Peterborough facility is currently licensed to produce fuel bundles from natural and depleted uranium dioxide pellets, as well as perform work on contaminated equipment from off-site nuclear facilities.

As described in the attached application, BWXT NEC is requesting renewal of the current licence for a term of 10 years at the current production limits. BWXT NEC is also requesting the flexibility during the proposed next licence period to conduct pelleting operations at both the Toronto and the Peterborough facilities with no change to the current production limits.

BWXT NEC's facilities both have Environmental Risk Assessments (ERA) completed in accordance with CSA N288.6, *Environmental Risk Assessments at Class I Nuclear Facilities and Uranium Mines and Mills* which remain valid for current operations. An additional ERA has

John MacQuarrie
President, BWXT Canada Ltd.
President, BWXT Nuclear Energy Canada Inc.
t: +1.519.620.5633 m: +1.519.242.7617 jmacquarrie@bwxt.com

been completed for the Peterborough facility to assess the inclusion of pelleting activities. This additional ERA is bounding in nature and is based on the Toronto facility's operating experience and performance for the manufacture of fuel pellets. This bounding Peterborough ERA is enclosed and assesses the potential future state of the Peterborough operation.

The attached application for licence renewal provides the basis for the renewal of the operating licence and demonstrates BWXT NEC's compliance with the Nuclear Safety and Control Act and associated Regulations. A mapping of licence application requirements set out in the General Nuclear Safety and Control Regulations, Class I Nuclear Facilities Regulations, Nuclear Substances and Radiation Devices Regulations, and the Nuclear Security Regulations is included as an appendix to the licence renewal application.

BWXT NEC is committed to continuously improve programs and systems to protect employees, the environment and our communities against environmental, health and safety hazards. As a result, radiation exposures have been maintained well below dose limits. Similarly, environmental emissions have been maintained at a small fraction of release limits and public doses have been maintained at a small fraction of the public dose limit.

BWXT NEC has been operating safely in Peterborough and Toronto for over 50 years. BWXT NEC's safety performance over the licence period demonstrates that it is qualified to carry out the activities permitted under the licence. The commitments made in the attached application establish adequate provisions for the protection of the environment, the health and safety of persons, the maintenance of national security, and measures required to implement Canada's international obligations.

If you require further information or have any questions regarding this application, please do not hesitate to contact me or Mr. David Snopek, Director EHS & Regulatory, at (705) 536-3624.

Sincerely,

John MacQuarrie
President, BWXT Nuclear Energy Canada Inc.

Cc: J. Lundy, T. Richardson, D. Snopek, S. Forsey

enclosure