



**Written submission from
Elaine Munro**

**Mémoire de
Elaine Munro**

In the Matter of

À l'égard de

**Ontario Power Generation Inc.,
Pickering Nuclear Generating Station**

**Ontario Power Generation Inc.,
centrale nucléaire de Pickering**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Pickering Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Pickering

Commission Public Hearing – Part 2

**Audience publique de la Commission –
Partie 2**

June 2018

Juin 2018

May 6, 2018

To: Canadian Nuclear Safety Commission (CNSC)
From: Elaine Munro
Re: Citizen Concern for Continued Operation of Pickering Nuclear Station

I am writing as a resident of the City of Toronto and as a citizen who has been environmentally concerned and active since the 1970's.

For more than five years, I have been our company's representative to Stewardship programs in several provinces. Through this connection, I've had the pleasure of participating in an event which brought Robert Kennedy Jr. to Toronto to share his experiences and insights. One of the major take aways was a new technology for "intensive" solar collection. The electrical power that could be generated through this method would make all nuclear generating plants obsolete, with no risk to human life or the environment.

Canadians have a reputation for taking the high road and in light the growing pressures on climate change and our environment, the time has come to make "better" decisions!!

My arguments supporting the close of the Pickering nuclear station are as follows;;;:

1. SHUT DOWN

It is no longer acceptable to run Pickering in the highly populated Greater Toronto Area.

No matter what industrial and scientific experts claim, I believe it is no longer acceptable to operate a major nuclear station in such close proximity to Toronto.

A major nuclear accident would impact too many people and cause irreparable damage to our environment.

There is no evidence, accessible to the public, indicating that OPG could safely evacuate the more than one million people who live within 20 km of Pickering or even the two million people who live within 30 km. The CNSC cannot approve the continued operation of Pickering without such evidence.

The province owns OPG and since the Fukushima accident, it has failed to update the provincial nuclear emergency response plans to be able to respond adequately and protect the public from such a serious accident. As OPG's sole shareholder, the province's poor performance overseeing public safety is sufficient grounds to deny OPG's request to continue operating Pickering.

While international safety guidance says population intensification near nuclear plants should be discouraged, the Ontario government continues to do the opposite – encouraging population growth near Pickering as part of its Places to Grow policy. Considering that Ontario – OPG's shareholder – has failed to assume its responsibility to oversee public safety, the CNSC should reject OPG's application.

By intentionally encouraging population growth around Pickering the province has made implementing its own nuclear response plans logistically challenging at best and impossible at

worst. The province - OPG's shareholder - has continuously undermined Pickering's safety. In response, the CNSC should reject OPG's application to continue operating Pickering.

OPG's operating practices are questionable. In 2013, OPG requested an extension to run Pickering beyond its design life but promised to shut it down in 2020. Now they are asking for a further extension. How can we trust that they won't continue to repeat this? In light of their practice of cost-cutting at the risk of public safety, the CNSC should reject OPG's request to continue operating Pickering.

2. TOO OLD, TOO RISKY AND NOT NEEDED

There is no credible justification for keeping Pickering online. OPG asked to keep operating Pickering beyond its design life in 2013 to fill the gap until new replacement reactors were established to go online in 2020. Since then, the government has cancelled its plans for replacement reactors due to declining electricity demand. The Pickering nuclear station has continued operating despite its output being surplus energy and sold to the US.

3. EMERGENCY PREPAREDNESS

OPG pays for nuclear emergency response and therefore sits in a financial conflict of interest position not to support nuclear emergency preparedness. The CNSC should ensure that public safety is both paramount and transparent to ensure that optimal preparations are funded and in place!

I support the requests made by the City of Toronto and the Region of Durham that CNSC should include a condition that the OPG licence requires it to compensate municipalities for all costs related to nuclear emergency planning and preparedness.

OPG has lagged behind Bruce Power in ensuring compliance with the CNSC's post-Fukushima nuclear emergency planning requirements. The CNSC should also require OPG to meet the minimum standard set by Bruce Power.

In complying with CNSC's "REGDOC (regulatory document)-2.10.1" on emergency response, Bruce Power ensured that all residents within 50 km of the Bruce nuclear station were informed of their right to acquire potassium iodide (KI) pills. In contrast, OPG has no outreach program to inform people in Toronto that they should order KI pills. The CNSC should require that OPG inform everyone within 50 km of Pickering that they should order KI pills.

In complying with CNSC's REGDOC-2.10.1 on emergency response, Bruce Power ensured that KI pills were pre-stocked in all schools within 50 km of the Bruce nuclear station. The CNSC should require OPG to ensure KI pills are pre-stocked in all schools within 50 km of Pickering.

In December 2017, the Auditor General of Ontario released a report detailing how the Government of Ontario had failed to ensure the implementation of its own nuclear emergency response plans. This highlights a publicly-sanctioned recommendation that CNSC should reject the request made by OPG on behalf of the province to continue operating the Pickering nuclear station.

4. ENVIRONMENTAL IMPACT

Simply put, the Ontario Power Generation's performance doesn't warrant renewal for continued operation of the Pickering nuclear station.

The Pickering nuclear station killed more fish in 2017 than it did ten years ago. This indicates that OPG has failed to reliably protect the environment and Lake Ontario. The CNSC should deny OPG's request to continue operating Pickering.

5. ENVIRONMENTALLY RESPONSIBLE & SOCIALLY-JUST CLEAN-UP OF PICKERING

OPG has consistently failed to plan for Pickering's closure. I agree with the motion passed by Durham Region asking for OPG to publish plans on how it will mitigate negative social effects of the station's closure, including plans for transitioning workers at Pickering to other work. This should be included as a condition in OPG's licence.

There should be a strategic environmental assessment to consider the most environmentally responsible and socially just way to dismantle Pickering and safely store the waste created. CNSC should reject OPG's proposal to simply close the station and wait forty years before considering how to clean up the station. CNSC should require an environmental review that considers alternative approaches to Pickering's dismantling and long-term storage before 2028.

OPG needs to be prepared for the possibility that the 18,542 tonnes of high-level nuclear fuel waste that Pickering has produced since it began operation will remain on site permanently. The current waste management facility consists of commercial grade buildings on the shores of Lake Ontario. These buildings have not been designed to be resist terrorist attacks. The CNSC should require OPG to develop more robust waste storage facilities (to withstand erratic weather, seismic rupture or terrorist attack) to protect the health and safety of citizens and the environment.

CONCLUSION

My submission is more than a declaration of "prevention and closure" but a statement of support for a safe and effective alternative to nuclear power generation. As the economic hub of the country, we can make informed and ethical decisions that will create and maintain jobs, provide a clear and consistent source of electrical power while ensuring the environmental viability of our region for generations to come.

Respectfully...

Elaine Munro