



Oral Presentation

Exposé oral

**Submission from
Kirsten Dahl**

**Mémoire de
Kirsten Dahl**

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

Louise Levert
Secretariat
Canadian Nuclear Safety Commission
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Sent via cns.interventions.ccsn@canada.ca

May 7, 2018

Dear Commissioners:

Re. Request to operate the Pickering nuclear station beyond design life (Ref. 2018-H-03)

Thank you for the opportunity to provide comment on Ontario Power Generation's (OPG's) ten year license renewal request for the Pickering nuclear station.

Continuing to operate this station beyond its design life is ill-advised for a number of reasons, which I will subsequently outline. My primary concern is great risks posed to public safety and the environment. OPG has not provided evidence that it will be able to protect the health of the community and our shared natural heritage systems in the event of a nuclear disaster. I urge you to reject the licence renewal application and undertake measures to substantially improve offsite nuclear emergency planning.

Simply put, a catastrophic nuclear disaster like Chernobyl or Fukushima could happen here, and makes the risk imposed on millions of people living in the Greater Toronto Area (GTA) unacceptable. OPG claims an impeccable history of safety operations but in reality, there have been a number of operational problems and near misses at the plant over its long lifetime. Particularly noteworthy among them occurred in 1994 when the emergency cooling system was used to prevent a meltdown, and more recently last year, when workers at both Darlington and Pickering nuclear facilities were pulled off their jobs due to a "concerning trend of safety incidents."

The steadfast assertion that the facility will operate until 2024 without incident downplays risks with potentially devastating consequences for the community. A single break in a CANDU reactor cooling tube which is only periodically inspected could trigger an accident. A wind storm like we witnessed this May could knock out critical safety systems. A worker could make a mistake. There are simply too many unknowns to account for.

Considering that the majority of the power output is exported, there is no justification to continue to run this plant. This license should not be considered until the adverse risks of this nuclear facility are acknowledged and prepared for.

In my view, the overconfident attitude of decision-makers has resulted in negligent offsite nuclear emergency plans. In not recommending the expansion of potassium iodide delivery, or a meaningful public outreach campaign beyond the primary zone, the revised Provincial Nuclear Emergency Response Plan fails to make public safety a real priority.

I am deeply concerned that emergency evacuation plans for people living beyond the arbitrary 10 kilometre zone remain a mystery, and that awareness of what to do in such an event is almost non-existent across the GTA. I am not confident that we have the systems in place to safely and quickly move one million people within 20 kilometres of Pickering nuclear station - a number that will continue to grow in accordance with Ontario's flawed Places to Grow policy. I am even less confident that a safe evacuation would occur in the City of Toronto, given the current lamentable state of traffic and the public's lack of knowledge of evacuation procedures.

Intentionally encouraging population growth near the Pickering reactor is grossly irresponsible and runs counter to international safety guidance. Why are our standards for the placement of windmills more stringent than the standards for a high-risk nuclear facility? New York is shutting down a nuclear plant that is 20 miles away from its city for this reason; we should do the same.

An accident at Pickering nuclear station could contaminate drinking water for 9 million people and yet the operation of the plant has been approved without an environmental assessment, a plan to dispose of nuclear waste or a strategy to clean our precious water in the event of a spill. Chernobyl has a permanent 30 kilometre exclusion zone while the clean-up efforts at Fukushima have passed the \$1 billion dollar mark. These communities are effectively environmental wastelands and sacrifice zones.

This license should not be considered until a comprehensive environmental assessment is undertaken and shared with the public.

Furthermore, OPG needs to prove they have the resources and skill to clean up should a major accident happen, and manage the waste which we know will remain dangerous long after we are gone.

As a resident of Toronto, I am pleased City Council has requested that the Canadian Nuclear Safety Commission strengthen offsite nuclear emergency preparedness and support efforts to minimize the risks that the Pickering nuclear facility poses, including shutting the facility down.

Provided that I am able to take time off work to travel to Courtice, I would like to make an oral presentation at the public hearings in July.

Thank you for considering these arguments in your decision.

Sincere regards,

Kirsten Dahl