Written submission from the City of Toronto

In the Matter of

Ontario Power Generation Inc.,
Pickering Nuclear Generating Station

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

Commission Public Hearing – Part 2

June 2018
TO: Canadian Nuclear Safety Commission  
FROM: James Kilgour, Director  
Office of Emergency Management  
DATE: May 7, 2018  
SUBJECT: Ontario Power Generation Inc. (OPG) request to renew its Nuclear Power Reactor Operating Licence for the Pickering Nuclear Generating Station (NGS)

As part of the formal public consultation process, City Council requested the Director, Office of Emergency Management to make a submission to the Canadian Nuclear Safety Commission (CNSC) regarding the Ontario Power Generation Inc. (OPG) request to renew its Nuclear Power Reactor Operating Licence for the Pickering Nuclear Generating Station (NGS) for a period of 10 years. City Council has asked for the following:

a. the City's ongoing support for transparency, public consultation, funding, strengthening emergency preparedness wherever feasible, protection of vulnerable communities, and world-class public safety as adopted by City Council on November 7, 8 and 9, 2017, as part of Item EX28.13 (http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX28.13);

b. request the Canadian Nuclear Safety Commission and the Provincial government to ensure awareness campaigns are in place to inform Torontonians on how to prepare for a nuclear accident at the Pickering or Darlington nuclear stations;

c. reiterate the City's ongoing concern regarding the lack of a clear justification to support limiting the delivery of Potassium Iodine (KI) pills to the current 10 kilometre zone;

d. support the Durham Region’s request asking the Province to release the technical assessment it commissioned to identify whether evacuation zones or Potassium Iodine distribution distances should be expanded; and

e. support Durham Region's request for the Canadian Nuclear Safety Commission to include a license requirement obligating Ontario Power Generation Inc. or the Government of Ontario to provide appropriate funding to municipalities for the implementation of the 2017 Provincial Nuclear Emergency Response Plan (PNERP) or related implementation plans.
On July 27, 2017 the following information was provided by the Office of Emergency Management to the Province of Ontario as part of their public consultation process on the Provincial Nuclear Emergency Response Plan. These follow points from our submission support part a. and b. of the motion passed by City Council.

**Funding/Resources**
- A funding model for ongoing operations of a nuclear program needs to be part of the new Provincial Nuclear Emergency Response Plan.

**Nuclear Public Education Program**
- To ensure consistency this should be led by the Province of Ontario and the operator of the nuclear installation shall provide the resources and assistance to establish and maintain a nuclear public education program.

**Training**
- The Province of Ontario needs to provide a training matrix for all stakeholders involved in an off-site response.
- The Province of Ontario must develop and make available in appropriate format and/or delivery model (on-line, in-class) the required training.

If you have any further questions please contact me directly.

Sincerely,

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