



Supplementary Information

Written submission from the Bruce Peninsula Environment Group

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

Renseignements supplémentaires

Mémoire du Bruce Peninsula Environment Group

À l'égard de

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

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

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

Juin 2018

Dear Canadian Nuclear Safety Commission,

Please accept a supplementary to BPEG's written CMD 18-H6-98, on an urgent issue.

We have been reading about OPG and CNSC staffs safety reports. Staff has concluded, after their lengthy safety findings that this now more than **40 year old** Nuclear Generating Station is fit to continue operating. *“In carrying out the licensed activities, OPG has made, and will continue to make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.”*

<http://www.nuclearsafety.gc.ca/eng/the-commission/hearings/cmd/pdf/CMD18/CMD18-H6A.pdf>

Going back about mid-point of its operating licence period which is now coming to an end, we recall an Action Item 2016-AMP-01 issued by the Director General of the Directorate of Power Reactor Regulation and Designated Officer to this Pickering NGS:

“On two occasions, OPG made unilateral decisions to cease corrective actions necessary for compliance with conditions of their Power Reactor Operating Licence for Pickering Nuclear Generating Station without notifying the CNSC. If not corrected, this behavior could in the future result in unreasonable risks to national security, the health and safety of persons and the environment.”

This severe safety infraction stands in stark contrast to OPG's glorious safety reports echoed by staff.

After several cautionary reminders, this designated officer was forced to take strong action, even with a Monetary Penalty attached. Having been involved with the Federal Nuclear Regulator for more than 3 decades, we believe that this is the first time that a nuclear power operator has been hit by an Administrative Monetary Penalty. How can CNSC staff now issue the above recommendation in the light of that occurrence??

We must remind the Commission members again that this is a more than 40 year old Nuclear Generating Station, which sits at the doorstep of the multi-million population metropole of Toronto, and which has had several close calls as referred

to in our written submission, including the pressure tube break-before-leak, recorded on the INES II.

This is a perfect example of playing Russian Roulette with an extreme risk of a Fukushima style multi-unit meltdown.

Can the members in good conscience accept the recommendations of their staff in making a decision to extend the operating licence for this risky, old, and degenerating nuclear plant?

We sincerely hope that the final decision will be taken in consideration of those irresponsible and unscrupulous recommendations.

Thank you for accepting this supplementary submission made on behalf of the Bruce Peninsula Environment Group (BPEG).

Sincerely,

Siegfried (Ziggy) Kleinau
Co-Founder and Outreach Director (BPEG)