



**Oral Presentation**

**Exposé oral**

**Submission from  
Stuart Smith**

**Mémoire de  
Stuart Smith**

In the Matter of

À l'égard de

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

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

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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**



c/o Louise Levert  
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Canadian Nuclear Safety Commission  
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1 May 2018

**Re: My opposition to the continued running of the Pickering reactors (Ref. 2018-H-03)**

Dear Commissioners,

Having recently moved to Toronto, I was deeply disturbed to learn I am living next to a nuclear generating station which still uses CANDU reactors outside one of the largest cities in North America.

It is beyond belief that the Canadian Nuclear Safety Commission (CNSC) is even considering the continued operation of reactors which rely on such old technology, have a history of significant accidents, are already running well beyond their design lives, and are located next to millions of people.

**For these, and other reasons I shall outline below, I implore you to reject the proposed renewal of its operating license.**

Of particular concern is their age. We are now in uncharted territory with this breed of reactor, and allowing Ontario Power Generation (OPG) to run them still further, I feel, would be a huge leap of faith by the CNSC. I understand that OPG previously applied to keep the Pickering reactors running until 2020 and the CNSC unfortunately approved this. But now OPG is again asking to continue running Pickering even longer until 2024. I do not trust this pattern of behaviour. It is inconsistent and self-serving. It means we can never be sure if we are being provided a full view of OPG's plan for the station. I am left to wonder how broad the CNSC's definition of "design life" extends. I fear it is unlimited.

And so, in the face of the CNSC once again looking at the renewal of OPG's application, I believe detailed emergency planning should be expanded to include a much greater radius than 10km—a concern I share with the City Council of Toronto [EX 33.6; April 24 2018]. Evidence on the ground from both Chernobyl and Fukushima demonstrate the effects of a nuclear disaster can require evacuation significantly further than this arbitrarily decided distance. A detailed plan with increased range should be, at the very least, a minimum requirement for OPG to continue operating at Pickering.

However, as I am sure you are aware, the very problem with drafting such plans is you can never know for sure what the nature of the threat will be. There are sequences of events and complicated mixes of causes which make it impossible to produce an accurate model of every possible danger from continued operations at Pickering. Even if you spent millions trying to

make an accurate prediction of risk, there would still be risk unaccounted for. Why be responsible for a disaster which could be even deadlier than Chernobyl or Fukushima?

On top of this, whilst considering OPG's claims on safety, I urge you to consider the fact that Pickering's output is mostly unneeded. It does nothing to save us money as rate-payers, with most of Pickering's energy exported at a loss but subsidised by the government. In fact, the only thing it does seem to do is make money for OPG, endanger Torontonians, kill fish in our lake, and waste our money. So I beg you to seriously consider why OPG really feel it necessary to allow the Pickering reactors to operate in the face of public safety. And if these reasons are not in-line with what a resident and rate-payer would consider good reasons, please do not renew its license.

With nothing seemingly in Pickering's favour, I believe the continued operation of this plant would solely be for political reasons – pressure from OPG over fears of lost income and pressure from OPG's shareholder – the Province of Ontario – over job losses. Neither lost income nor job losses should be prioritised over safety, but even so, job losses could be significantly limited by adapting the decommissioning plan to require decontamination to take place immediately after closure rather than decades in the future when most expertise and institutional memory have disappeared.

Therefore, I believe approval of the license renewal would bring into stark question the impartiality of the CNSC—which I am sure we both agree should be staunchly independent. It would be depressing to see the CNSC struggle to separate the politics from what you are mandated to do: prioritise public safety.

It seems a no-brainer that today you would reject any proposal to build reactors so close to such a densely populated urban area without significantly enhanced nuclear emergency planning and safety improvements. If it cannot be closed, we certainly have a right to better plans and protections than OPG currently offer us.

Thank you taking the time to read my concerns, and I look forward to expanding on them in person at the second stage of the CNSC hearings in June.

Yours faithfully,

Stuart Smith