



Oral Presentation

Submission from teachers of the Toronto District School Board and the Toronto District Catholic School Board

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

Exposé oral

Mémoire d’enseignants du Conseil scolaire du district de Toronto et du Conseil scolaire catholique du district de Toronto

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

Canadian Nuclear Safety Commission (CNSC)
280 Slater St.,
P.O. Box 1046
Ottawa, Ontario
K1P 5S9
Via: cns.interventions.ccsn@canada.ca

May 7, 2018

Subject: Equal levels of public safety for Toronto's students (Ref. 2018-H-03)

Dear Commission,

As teachers employed in Toronto area schools we have an interest in fostering learning, but also protecting the safety and well being of our students.

We are concerned that students near Ontario Power Generation's (OPG) Pickering and Darlington nuclear stations are being provided less public safety than students near Bruce Power's nuclear station on Lake Huron.

As you know, there are ten reactors in the Greater Toronto Area (GTA) at the Pickering and Darlington nuclear stations. While we are fortunate to live in a region of the world that has not experienced a nuclear disaster, we've seen nuclear accidents happen internationally. We know such events can happen and that we should be prepared for an accident at a nuclear station within the GTA.

After the 2011 Fukushima nuclear accident in Japan, the Canadian Nuclear Safety Commission (CNSC) commendably put in place new rules requiring reactor operators to deliver potassium iodide (KI) pills to all residents within 10 km of the Pickering, Darlington and Bruce nuclear stations. It also requires OPG make KI available to all residents within 50-km Ingestion Planning Zones surrounding Ontario nuclear stations.

Easy access to KI pills is important following a nuclear accident because exposure to gaseous radioactive iodine increases the risk of thyroid cancer. The timely ingestion of KI can block radioactive iodine from entering the thyroid gland and significantly reduces the risk of thyroid cancer following a reactor accident.

Children are more sensitive to radiation. Following the Chernobyl disaster thousands of children were struck with thyroid cancer. For this reason, the American Thyroid Association recommends KI be stockpiled in schools within 50 miles of U.S. reactors so medical authorities can administer KI in a timely manner following an accident.

In line with the need to protect children at greater distances from nuclear stations, the CNSC's post-Fukushima KI distribution requirements also include a provision requiring reactor operators particularly consider how KI pills are made available to sensitive populations within 50 km of the Pickering, Darlington or Bruce nuclear stations.

Bruce Power commendably complied with the new CNSC requirements by providing KI tablets to all school boards with schools within the 50 km Ingestion Planning Zone. Since 2016 KI tablets have been pre-stocked in the all schools within 50 km of the Bruce nuclear station. Parents have also been provided information on the potential need to administer KI in the event of an accident

Although KI has been pre-stocked for years in schools within 10 km of the Pickering and Darlington nuclear stations, OPG has not expanded the pre-stocking of KI to schools within 50 km of these nuclear stations like Bruce Power. We think it is unfair for students near OPG's nuclear stations to be provided less public safety than children near Bruce Power's nuclear station.

There are over 250,000 students attending schools under the jurisdiction of the Toronto District School Board (TDSB). There are more even more students going to schools under other Toronto-area Catholic and French school boards. We believe these students deserve equal levels of protection.

OPG is already proceeding with the multi-billion dollar refurbishment project to enable the long-term operation of the Darlington nuclear station. It is also proposing to spend hundreds of millions of dollars to continue operating the Pickering nuclear station, which is just 30 km from downtown Toronto.

We understand that the Commission is considering OPG's application to continue operating the Pickering nuclear station in late June. This is an appropriate time to assess whether OPG is providing the Torontonians world-class safety. As shown by Bruce Power's efforts to strengthen the safety of students following Fukushima, we don't believe OPG is providing Toronto's youth the safety they deserve.

We respectfully ask the Commission ensure Toronto's students are provided the same protection provided students near the Bruce nuclear station.

We ask the Commission require OPG implement KI stockpiling within all Toronto-area schools within 50 km of the Pickering and Darlington nuclear stations. In line with the example provided by Bruce Power, we ask the Commission direct OPG to cover all costs related to the pre-stocking of KI in Toronto-area schools.

Thank you for your attention.

Respectfully,

Dominique Bruce, Adam Beck P.S.
Joy Lachica, ETT Executive
Cynthia McCarry, ETT Regional Councillor
Kelly Dale, Adam Beck P.S.
Cathy LaManna, retired
Hedda Hughes, retired
Emily Dunbar, Adam Beck P.S.
Marie Orloff, Adam Beck P.S.
Joanna D'Amico, Adam Beck P.S.
Martine Gingerich, retired
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Carmen Hurtado, Inglewood Heights P.S.
Phianna Noor-Merharchand, Anson Park p.S. Scarborough
Sophie Wong, Glamorgan JPS
Deborah Castello-Burrows, Hall Jr.P.S.
Emily Chan, Alpha Alternative JPS.
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