



**Written submission from
Brad Blaney**

**Mémoire de
Brad Blaney**

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

May 7, 2018

Canadian Nuclear Safety Commission
c/o Louise Levert
280 Slater St., P.O. Box 1046
Ottawa, ON K1P 5S9

Email'd to: cns.interventions.ccsn@canada.ca

Re: Hearing Number Ref 2018-H-03 - Expired Pickering Nuclear Reactors

Dear Members of the CNSC Board, CNSC employees, and Mike Binder,

I am writing this letter to demand that the CNSC reject the recent request by Ontario Power Generation (OPG) to extend their operation of the derelict reactors in the Pickering nuclear station to the year 2024

It is a simple fact that the original design specifications for these units did not intend to allow plant operations to extend beyond 2015. Now OPG is using the same “science fiction science”, accepted by the CNSC in 2013, as the basis to now extend plant operations until 2024.

This raises the legitimate question as to whether the CNSC is appropriately qualified to review such a request by this operator. One thing is certain; both the CNSC and OPG want to keep the plants open until 2024, at any cost.

To ensure that OPG executives and the other 10,500++ nuclear millionaires can sustain their lucrative salaries and pension benefits, these plants must remain on line regardless of the fact that there is no economic, or environmental, advantage to Ontario taxpayers.

Not to be outdone by OPG, CNSC nuclear millionaire staffers, officers and CNSC “scientists” will, similarly, benefit by rubberstamping of another OPG extension request; just as the CNSC did for OPG in 2013.

It is quite obvious that, if the plant is not producing power, then OPG and CNSC will lose the power to force their will onto taxpayers and citizens.

As a member of the public, I made a presentation to the CNSC at the 2013 hearing, along with other members of the public, scientists and other experts in energy and environmental protection. At that time, valid concerns were made to cease operation of the out-of-date nuclear reactors at Pickering. These concerns have only compounded over the years as this aged equipment leaks and becomes even less reliable.

The history of catastrophic damage from nuclear accidents, the unnecessary risks nuclear energy poses to human health and the environment, and the serious and growing problem of nuclear waste are all valid reasons for the CNSC to require a complete shut down of the Pickering nuclear station, and further approval to operate that facility.

It is disturbing just how OPG trots out the same material for CNSC to use as a basis for this extension approval request.

Historically, the CNSC has never denied a request by plant operators thereby severely undermining the credibility of CNSC as protectorate of the safety of the citizens over financial interests of OPG.

When Steve Harper appointed Mike Binder to reverse the closure of Chalk River, he also knew that Mike Binder would be the right person to insulate plant operators from any critical analysis of their submissions, as well as ensuring the timely approval of their every wish as he has since being appointed.

The CNSC has been a biased system - acting as both judge and jury. It is not open or transparent, or objective. In fact, the contempt that Mike Binder, the CNSC Board and scientists have for the public “intervenor” is without bounds.

One needs only to sit through the a couple of hearing to understand how Mike Binder and the Board see “public intervenors” as ignorant and irrelevant, and interfering with to a process that just a “love in” for industry insiders, OPG employees and CNSC staffers.

Further confirmation of the absolute contempt Mike Binder has for the people he serves can be found in his “Protocol Doctrine for Intervenors”. This document specifically instructs public intervenors on how to dress, how they may address the commission members, where they may be seated, in addition to requiring intervenors to provide the Commission with their presentation BEFORE making their submission to the Board.

It might be time to remind Mike Binder that the CNSC is only a QUASI JUDICIAL safety review commission, and that he is not a real “Judge”.

The location of the hearings is not suited to accommodate easy public access, time restrictions on presentations limit serious discussion of complex issues, and discrediting of experts and participants by the CNSC is commonplace, unprofessional and undesirable. It is evident from previous hearings that operators like OPG feed off the CNSC contempt for any public criticism of the sophomoric “studies and research” which OPG pawns off as “scientific proof” that these plants can be safely operated for years after their end of life term.

Additionally, the Memorandum of Understanding with the Department of Fisheries Oceans initiated by Steve Harper and Joe Oliver, transferred many DFO scientists who might have provided a critical peer review of OPG submissions in the past, such that they interfered in the rubberstamping of the OPG. Clearly the elimination of any DFO intervenor status was another mandate of Mike Binder which has destroyed CNSC credibility, but only in its capacity as regulator responsible for the safety concerns of Canadians. OPG and the other operators have, however been given “carte blanche” under Binder’s leadership.

While doing nothing for the public interest, the CNSC nevertheless, has ensured its own existence in supporting OPG's 'make-work projects' which first favour OPG staff and the nuclear industry insiders where absolute cronyism, and nepotism, runs rampant.

The nuclear energy agenda is not just an Ontario issue; it is a global threat, such that after the very brief nuclear fuel cycle for commercial power use is over that all of humanity is exposed to untold, and known, nuclear waste legacies which threaten the health, safety and financial stability of Ontario and Canada.

The "business of nuclear waste" is not an opportunity lost on anyone with a brain. Mike Binder was selected by Steve Harper and Joe Oliver to fulfil another mandate; ensure that OPG will have a Commercial Nuclear Waste Dump in the town of Kincardine. This decision is critical to so many things nuclear in Ontario, which CNSC cannot, and will not; stand against the insanity of building this dump on the shore of Lake Huron. This OPG application to extend is an important ruling for OPG, and part of a carefully orchestrated sequence of rulings (as was the updated CNSC "nuclear fuel transportation" regulations) to ensure that OPG can dump (as well as being paid for dumping) the retro-fit waste soon to be created.

Most importantly, the CNSC dump approval will enable OPG management a significant personal financial incentive to offer global customers a solution for the last, and worst, part of the nuclear fuel cycle; all the expense of the taxpayers of Ontario.

The trucking/dumping of nuclear waste from all over North America for deposit in Kincardine, will also benefit the CNSC during this most lucrative stage of the nuclear fuel cycle; the dumping of nuclear waste into the ground.

The CNSC, for example touts their "lessons learned by the industry" after Fukushima NPP meltdowns in March 2011, and how these lessons have changed the way plant operators carry on their business. Some CNSC responses have included directing plant operators to have access to back up water pumps that can be in the event of the loss of heat sink, or loss of power. Unfortunately, the CNSC and its scientists completely ignored the fact that this additional waste water would have to be stored somewhere, or be pumped back in the lake after a trip through a failing reactor core. The fact is that the CNSC and OPG are not interested in the "post-accident" realities.

The "emergency evacuation" protocol the CNSC and OPG coordinates with the local, provincial and federal governments are nothing short of the biggest joke around. To put it mildly; "you are on your own".

In another example of CNSC cynicism, it recommended and distributed Iodine pills so down winders could take the pill 24-48 hours prior to any emergency venting if required to immediately release pressure in the reactor containment. The reality is that the CNSC cannot give such "early warning" because any venting would be under emergency circumstances, as in it would have to be without any warning to down winders.

The public needs a regulator which also acknowledges the post-accident the consequences such as they are playing out each day in Japan since the accident there began. The daily reality for the Japanese people, applauded by the global nuclear regulators like the CNSC includes “decontamination” efforts that see dangerously contaminated material being placed in one tonne bags and “temporarily” buried throughout Japan, now numbering in the 10’s of millions (30m-50m++), or burning what cannot be buried in incinerators all over Japan.

Additionally, the international nuclear regulators, to which CNSC subscribes, endorses the forcible return of “nuclear refugees” to their irradiated (“decontaminated”) homes and the resumption of farming on contaminated lands.

On these facts alone, one really has to question whether the CNSC cares anything about the land or the people surrounding these derelict Pickering reactors.

The nuclear fuel cartel, the CNSC and OPG see the benefits of the business like no one else, it is an industry which capitalizes on the “gains” but socializes the “losses”.

The nuclear industry is the greatest corporate welfare bum of all and OPG is the poster child. Unfortunately under Mike Binder’s leadership the CNSC is just another OPG henchman pretending to care about the safety of Canadians.

Notwithstanding that CNSC, long ago approved the extension, I demand that the CNSC deny this OPG request to extend operations at Pickering beyond 2020.

The CNSC must immediately close The Pickering nuclear station and implement the decommissioning of the site.

Brad Blaney

Copied to: Environmental Commissioner, Media, Interested Parties