



**Written submission from
Melis Kilic**

**Mémoire de
Melis Kilic**

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

c/o Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater St., P.O. Box 1046
Ottawa, Ontario K1P 5S9
Fax: 613-995- 5086
Via cncs.interventions.ccsn@canada.ca

May 7, 2018

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

Dear Commissioners,

Thank you for your time and attention to this letter.

I am deeply concerned by the mechanisms by which Ontario Power Generation seeks to continue to operate Pickering Nuclear Plant beyond its' design life. It is clear that the continued operations of Pickering Nuclear plant poses unacceptable risks to public health, safety, and the environment.

Since the *Nuclear Safety and Control Act* stipulates that the Canadian Nuclear Safety Commission (CNSC) has a mandate to regulate nuclear energy to protect health, safety, and the environment, **I request that CNSC deny OPG's request to renew its' operating license of the Pickering reactors.**

Below I have outlined the unacceptable risks Pickering nuclear station poses to Canadians and to residents of the Greater Toronto Area.

Pickering Nuclear station poses unacceptable health, safety, and environmental risks

High population density risks

I am deeply disturbed that Toronto is the largest metropolis in the world to be at such close proximity to a nuclear station. I am confident that the CNSC would reject a proposal to build new reactors within 20 kilometers to millions of residents today, therefore extending OPG's operating license of its' reactors that are within 20 kilometers of 2.2 million residents should also be denied.

Aged plant risks

It is further worrying to me that the Pickering nuclear plant poses unique safety risks as an aged plant that continues to operate beyond its' design life. Aging nuclear plants and their aging components pose increased safety risks. This plant was ready to be decommissioned 5 years ago.

I find it unacceptable that worker transition plans have not been made available to the public, if they have been made at all.

Radioactive waste storage risks

Not only does Pickering plant continue to emit low levels of radiation - the long term consequences of which continue to be scientifically debated, but Pickering will also forever be the storage place for toxic radioactive waste. This waste, as it continues to build up, will remain a danger to the surrounding communities long after the plant has ceased operations.

Natural disasters and terrorism risks

Seismic activity has been recorded near the Pickering nuclear facility and OPG's current waste management facilities are not yet resistant to terrorist attacks. It is unacceptable to continue to operate and manage Pickering without elaborating on prevention, detection, and response measures for a wide range of nuclear security threats of which terrorism is only one.

Lack of transparent emergency planning

OPG has only sent emergency response kits to residents within 10 kilometers of the plant. Residents as close as 30 kilometers to the Pickering plant in downtown Toronto have not received any information on emergency evacuation measures. In the event of an emergency, which is a credible possibility, it is unclear what these residents should do to protect themselves and their families. OPG's own website says that "*residents near nuclear facilities are responsible for being informed*".

Inadequate potassium iodide (KI) pill distribution to vulnerable communities

Although potassium iodide (KI) pills have been made available, no large public health campaign or authority has advertised the fact. It has been difficult for me to access information on pill distribution despite having sought it. As a result, I fear the pills have not been effectively and completely distributed to vulnerable communities within the Pickering plant's 50 kilometer radius.

Environmental destruction to Lake Ontario's ecosystem

Heat ejection by the Pickering plant has strained the ecosystem of Lake Ontario and aquatic life continues to be lost. Furthermore, Lake Ontario remains an important fresh water source to millions of Canadians and any leak of demineralized water as we have seen in March 2011 by the Pickering station is absolutely unacceptable.

Pickering nuclear station's documented operational problems risk: Canada's most dangerous nuclear station

Since the 1983 loss of coolant accident at Pickering reactor 2, the plant has had a long history of documented operational problems and poor performance. This history, coupled with the single containment system, has meant the Pickering plant is especially susceptible to a cascading accident as seen at Fukushima where multiple adjacent reactors may be damaged when one

reactor is damaged. It is appalling as is that OPG has been authorized to continue running this plant well beyond its' design life into 2020 given this deeply troubling history.

Conclusion: We must not bear these unacceptable risks to produce surplus energy.

Even if all safety precautions were adequately followed, there is no guarantee that a nuclear accident will not occur. It is clear the Greater Toronto Area is under a very large burden of risk, but it remains unclear why this risk continues to be taken. The energy that the Pickering plant produces is now surplus energy that is being shipped to the United States. **Since the energy generated by the plant is not needed in Canada, it is unacceptable that Canadian citizens and residents shoulder the burden of this risk.**

By continuing to operate Pickering nuclear station, we are effectively divesting from carbon free alternatives that are safer and more environmentally friendly.

I ask you to deny OPG's request in accordance with the CNSC's mandate. I will not be making an oral statement at the upcoming June hearing.

Thank you.

Sincerely,
Melis Kilic