



**Written submission from
Jeff Brackett**

**Mémoire de
Jeff Brackett**

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 6th, 2018

c/o Louis Lavert
Secretariat
Canadian Nuclear Safety Commission,
280 Slater Street, P.O. Box 1046
Ottawa ON., K1P 5S9

Via: cns.interventions.ccsn@canada.ca

Re: Renewal of Operating License for the Pickering Nuclear Generating Station -
Ref. 2018-H-03

I am writing to urge the Canadian Nuclear Safety Commission to reject Ontario Power Generation's proposal to continue operating the Pickering nuclear reactors beyond 2020. These reactors are far past their best before date and become more of a risk to public safety every day.

OPG said it would close Pickering in 2020, now they want the CNSC to approve an unprecedented 10 year license to operate the reactors until 2024, and perhaps beyond that. You don't give a ten year license to a facility that is hobbling up to the finish line. There is very little justification for continued operation of PNGS. Ontario doesn't need the power. OPG is selling Pickering's surplus energy. The province is squeezing every last bit of revenue out of the old reactors with electricity exports and saving money by putting off costly modifications that would bring the plant into compliance with modern safety standards.

The Pickering reactors are the oldest in the country and would never be permitted to be built or operated as they are today. Pickering is obsolete and fails to meet current new build and IAEA guidelines. Surely the CNSC must agree that it is getting more and more positively ridiculous to overlook positive reactivity issues at Pickering.

When PNGS was proposed and built the area was farmers fields and open space. Now the aging reactors are inside the Greater Toronto Area, the largest urban centre in Canada. Where evacuation of a 20 km zone at Fukushima meant moving 150,000 people out of harms way, there are over a million people within 20 km of PNGS. Continued operation of these reactors is not acceptable. 'Grandfathering' or overlooking deficiencies arising from the age of the facility trivializes the risk and should no longer be permitted in the commission's licensing philosophy.

The Pickering nuclear station has run its course. It has experienced life extensions through rebuilds and through CNSC use of creative licence. It's time to pull the plug.

Sincerely
Jeff Brackett

I do not wish to make an oral presentation.