



**Written submission from
Christine Drimmie**

**Mémoire de
Christine Drimmie**

In the Matter of the

À l'égard d'

Ontario Power Generation Inc.

Ontario Power Generation Inc.

Application to extend the operation of
Pickering Nuclear Generating Station
Units 5 to 8 until December 31, 2026

Demande visant à prolonger l'exploitation
des tranches 5 à 8 de la centrale nucléaire de
Pickering jusqu'au 31 décembre 2026

Commission Public Hearing

Audience publique de la Commission

June 2024

Juin 2024

Dear Senior Tribunal Officer,
Commission Registry,
Canadian Nuclear Safety Commission
Email: interventions@cnsccsn.gc.ca

I request to intervene in writing with respect to the hearing to be held the week of June 17, 2024 to consider extension of the commercial operation of the Pickering Nuclear Generating Station, units 5 to 8, until December 2026.

My concerns relate to:

1. the capacity and readiness of Emergency Management Ontario(EMO) to support the offsite protective aspects of a nuclear emergency
2. the level of community awareness of both the proposed extension of operations at PNGS and of emergency procedures beyond the 3 km zone and outside the City of Pickering
3. the condition and readiness of the Irradiated Fuel Bays to safely manage the many additional used fuel assemblies that will need to be cooled as all units move to a safe storage mode by 2028
4. the separate (but intrinsically related) very low-profile hearing to change the current licencing basis of the Pickering Waste Management Facility to allow dry storage of used fuel after just 6 years of cooling in the irradiated fuel bay.

With respect to **concern 1, capacity and readiness of EMO** to provide the protective services offsite in case of a nuclear emergency, OPG's submission notes:

According to OPG's submission on p. 36, "In May 2022, OPG and Emergency Management Ontario (EMO) endorsed a new five (5) year agreement to support EMO in the planning, maintenance, and execution of the PNERP. This new agreement further supports the province who provide staff with expertise in emergency planning, nuclear and radiological science, hazard identification and risk assessment, drills, and exercises, maintenance of 24/7 nuclear emergency response capability, and nuclear education and emergency preparedness materials."

Perhaps this new agreement was executed in anticipation of a revised PNERP being available imminently. However, a presentation by EMO staff at the February meeting of the Durham Nuclear Health Committee revealed that a revised PNERP has still not been completed. In fact, based on the results of the IAEA mission begun concluded in 2022, the PNERP is apparently being completely overhauled (policies, procedures and programs) through a three-year nuclear emergency enhancement project. Consultation with Indigenous communities and the general public is due to occur over the spring and summer of 2024. This does not sound like a plan that is up-to-date or ready to guide the surrounding community through a crisis. Assurances from the Province that the EMO

nuclear division is fully funded, staffed and ready to, not only complete the PNERP in a timely way, but also to fully implement it are required prior to extending the operation of the aging plant at Pickering.

Concern 2 is related to concern 1. What evidence can OPG or the Province provide to show that the population surrounding Pickering, beyond the 3 km zone in particular, is aware of the current and future plans for Pickering. What surveys have been done by the Province to establish benchmarks for awareness and capacity of the population to respond in the ways expected in the PNERP? Has an emergency drill involving the broader public every been run, even in the three km zone? How does the citizen advisory committee communicate out the public about the safety issues?

Concern 3 relates to the condition of the Irradiated Fuel Bays. Page 94 of the submission refers to projects to improve the performance of the fuel bays. Many equipment upgrades are mentioned to support the safe storage program. But the structural condition of the bays is barely mentioned. Do they leak? What does groundwater monitoring around the bays reveal? Before filling the bays up with 2 full cores of fuel rods, are we sure the structure is safe and durable for the next decade or more should the proposed plans to remove the fuel after only 6 years not work out.

Concern 4 regarding the separate hearing on the Pickering Waste Management Facility links to concern 3. In my opinion, the fragmented decision-making imposed by the CNSC licencing process is a key flaw in the system. It means decisions to create more used fuel are separated from the decisions about how to store it. This has allowed the nuclear industry in Canada to continue to dither, defer and delay how they will ultimately manage their waste products. If the industry is so technically competent and advanced, why have they not yet solved this problem in more than 50 years? IN ANY CASE, the changing the licensing basis from for the PWMF from 10 years in the pool to 6 years of cooling is a significant change. It appears that making room in the pool to support the life extension and safe storage phase is the key motivation but is it safe. That is yet another set of reports to try and plow through. The community deserves a clear, plain language explanation in a document that does not take days to read.

Christine Drimmie

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