



Supplementary Information

Presentation from Greenpeace

In the Matter of

Bruce Power Inc. – Bruce A and B Nuclear Generating Station

Request for a ten-year renewal of its Nuclear Power Reactor Operating Licence for the Bruce A and B Nuclear Generating Station

Commission Public Hearing – Part 2

May 28-31, 2018

Renseignements supplémentaires

Présentation de Greenpeace


À l'égard de

Bruce Power Inc. - Centrale nucléaire de Bruce A et Bruce B

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 Bruce A et Bruce B

**Audience publique de la Commission –
Partie 2**

28-31 mai 2018



***The need for more oversight:
risk, complexity, politics
& public participation***
Shawn-Patrick Stensil
May, 2018

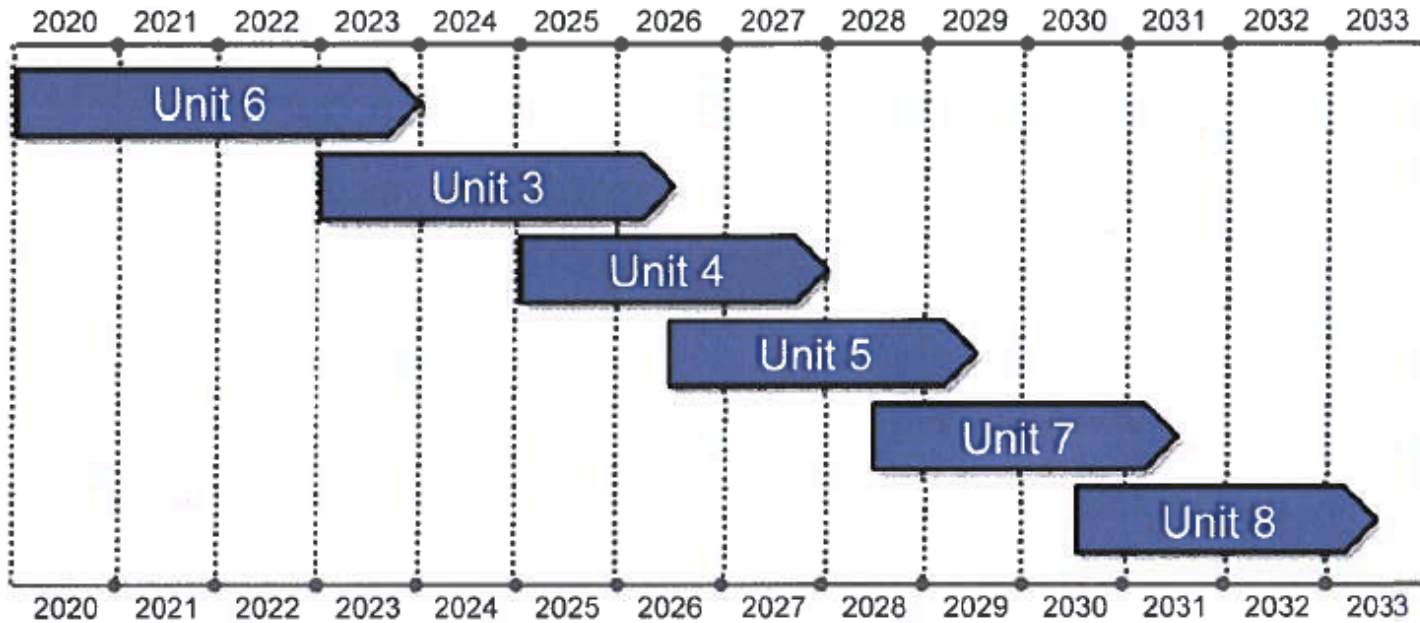
Planning for life-extension offramps



Request: The Commission should only approve a five-year licence to ensure the Commission has the capacity to appropriately respond to changes in provincial energy plans.

Request: The LCH should be modified to provide guidance to staff on how to approach provincial offramp decisions, including regular status reports from Bruce Power.

Commission oversight of aging risks

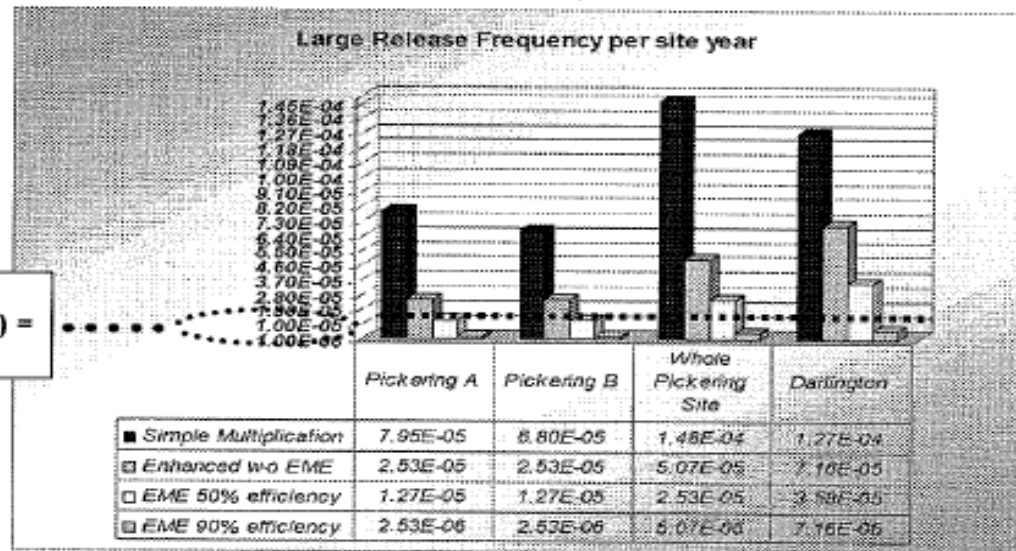


Request: In light of the significant technical uncertainties and the potential for external political pressure, the Commission should maintain its authority to review and approve reactor service-extensions.

Risk Aggregation for Multi-unit Sites

LRF Whole-Site Aggregation

Limits set by Licensee (per unit) = 1/100,000 years

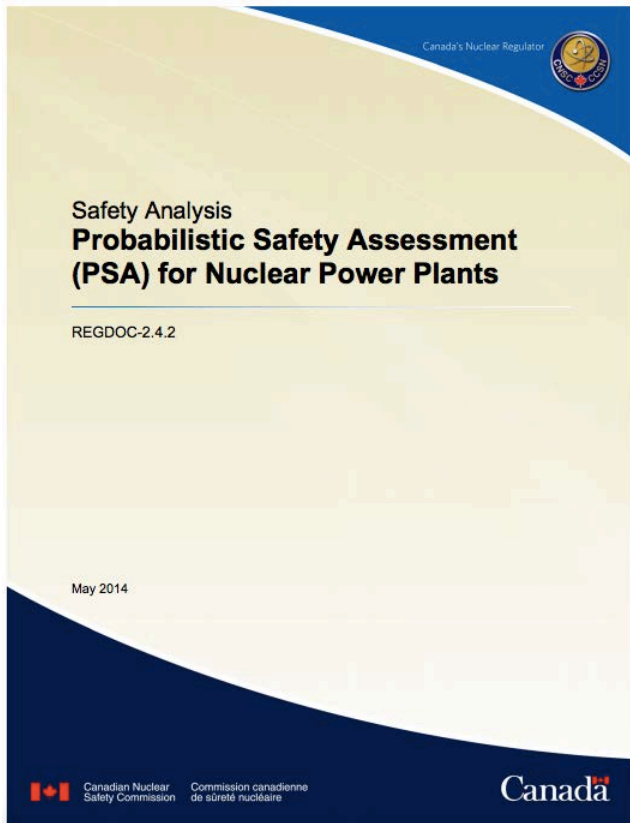


Note:

- For Pickering A, multiplication factor for unit LRF is 1.27 instead of 2
- For Pickering B, multiplication factor for unit LRF is 1.3 instead of 4
- For Darlington, multiplication factor for unit LRF is 2.25 instead of 4

Offsite radiation exposure risk has been underestimated

Site-Wide Risk Assessment



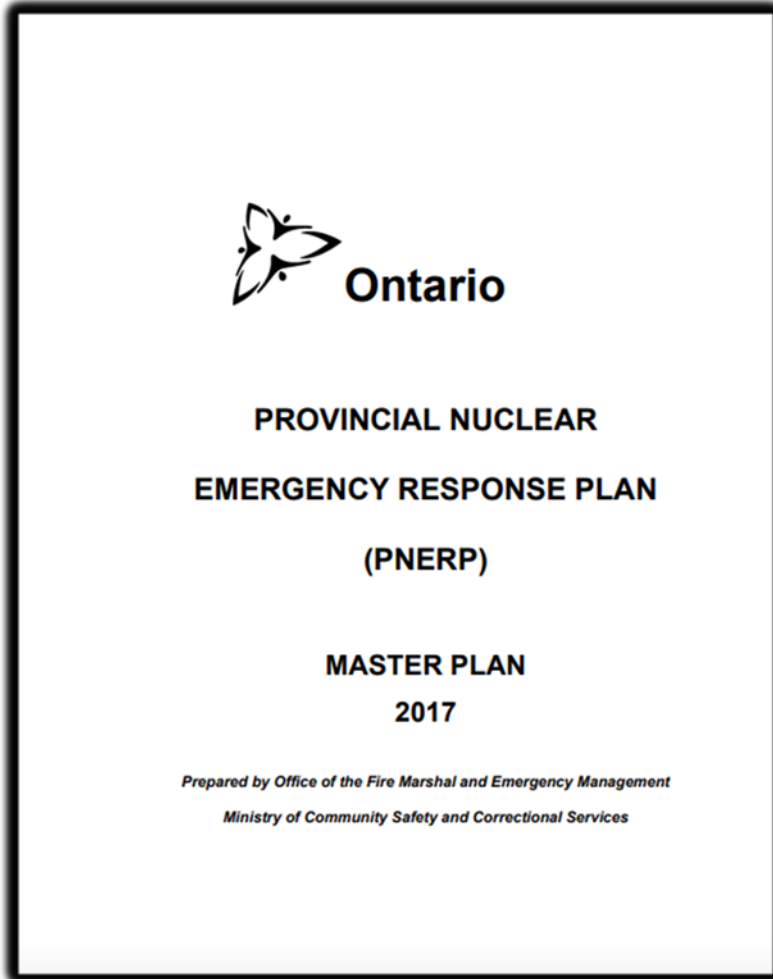
Request: Direct CNSC staff to include a site-wide safety limit in the next iteration of REGDOC-2.4.2, which is scheduled to be updated in 2019.

Request: Bruce Power should be directed to plan and prepare a site-wide risk assessment for the Bruce site in support of the PSR it will produce by 2028.

Request: Instruct CNSC staff and Bruce Power to prepare the first iteration of a whole-site risk assessment for the Bruce nuclear site for the next licence renewal in 2023.

Need for Site-Wide Large Release Frequency Limit

Ontario's updated emergency plan



- Insufficient time to review the updated implementing plan.
- Emergency Planning Safety Report is out of date and should be updated.
- New PNERP set to be updated every five years, but may be updated before depending on provincial accident study.

Update & review safety report

Evidence-based decision-making



Request: The CNSC should request the Ministry of the Environment and Climate Change to designate the Bruce B life-extension for an environmental review.

Request: if an environmental review is not carried out on the Bruce B life-extension, the CNSC should direct CNSC staff undertake or require Bruce Power to commission a study of the impacts of significant radioactive releases at the Bruce site.

Lack of environmental review is unacceptable

Conclusion: The public as well as the Commission have an important role to play in ensuring CNSC staff are appropriately carrying out their responsibilities. Reducing opportunities for the public and Commission to scrutinize the behaviour of Commission staff may compromise safety.

Request: The Commission should only approve a five-year licence to encourage greater transparency and accountability. This licence should require CNSC staff and Bruce Power to report annually on significant issues such as the aging of the station and the status of government decisions on future life-extensions.