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Oral Presentation

Submission from the Canadian Association of Nuclear Host Communities and the Municipality of Clarington Exposé oral

Mémoire de la Canadian Association of Nuclear Host Communities et de la municipalité de Clarington

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





April, 2018

SUBMISSION BY THE CANADIAN ASSOCIATION OF NUCLEAR HOST COMMUNITIES

SUBMISSION TO THE CANADIAN NUCLEAR SAFETY COMMISSION WITH RESPECT TO THE APPLICATION BY ONTARIO POWER GENERATION INC. TO RENEW ITS POWER REACTOR OPERATING LICENSE FOR A PERIOD OF 10 YEARS FOR THE PICKERING NUCLEAR GENERATING STATION

THE Canadian Association of Nuclear Host Communities (CANHC) welcomes the opportunity to comment on the various matters related to OPG's application to renew its nuclear operating license.

For the record, I am Adrian Foster, Chair of CANHC and Mayor of the Municipality of Clarington, the host community of the Darlington Nuclear Generating Station.

CANHC is an Association comprised of the heads of Council of municipalities that host major nuclear facilities in Canada. Our Association provides a forum for our members to share knowledge and best practices in our respective experiences in working with the nuclear industry. Most importantly, our Association provides support to our members through public hearing participation, and liaison with various government agencies to further our objectives.

CANHC has established an excellent working relationship with OPG and are familiar with the many facets of its operation at the Pickering Nuclear Generating Station. Our submission is therefore premised on our lengthy observation and familiarity with both OPG as the operator and with the plant itself. We urge the Commission to give our comments its utmost consideration.

First and foremost, our interest in this matter is public safety including safety of the workers, many of whom are residents of Durham Region, and of course the safety of residents, particularly those living nearby the Station. We believe public safety



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should never be compromised. OPG, through its many years of operating the Pickering Nuclear Station since the late 1970s, has demonstrated, and continues to exercise its due diligence when it comes to public safety. Its excellent safety record is a matter of public knowledge and is on record with the Commission. OPG can elaborate on its safety record and the high standards maintained for its operations.

Another aspect of public safety is emergency preparedness where Emergency, Fire and Police Services regularly participate with OPG across Durham Region in various exercise drills, evacuation planning, off site training at Wesleyville facility.

Since the start of construction of the Pickering Nuclear Station in the early 1970's, to its ongoing operation, we have been pleased with OPG's exceptional track record for the safe operation of the Pickering Station. There is every reason to believe that OPG will continue to uphold its excellent safety record. The Pickering Station has been safely operating for more than 40 years. Following the event in Fukushima, OPG made substantial investment in safety equipment and procedures. In the CNSC's Annual Nuclear Station Performance Report, we note that the Pickering Station continues to meet or better performance expectations in all 14 safety-related areas. This leads us to believe OPG is not only committed to public safety, it has proven to our satisfaction that they have given public safety utmost attention and top priority in the continuation of the operation of the Pickering Station.

Our CANHC communities enjoy the economic benefits of this stable, highly skilled and safety conscientious work force. The continued operation of the Pickering Station is essential to sustain employment opportunities, commercial and industrial development, and generate tax revenue to the local governments. Last but not least, OPG has been an excellent corporate citizen in the local communities and we welcome the opportunity to foster that relationship in the coming years, through the many sponsorships and employees' engagement in various community activities.



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In conclusion, CANHC fully supports the OPG application to renew the operating license for the Pickering Station and I thank you for the opportunity to comment on the application for license renewal.

Sincerely yours,

Adrian Foster Chair of CANHC





Mayor Adrian Foster April 26, 2018

Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046
Ottawa, ON K1P 5S9

E-mail:

cnsc.interventions.ccsn@canada.ca

RE: 10 YEAR RENEWAL OF THE POWER REACTOR OPERATING LICENCE FOR THE PICKERING NUCLEAR GENERATING STATION

On behalf of the Municipality of Clarington, I would like to thank the Canadian Nuclear Safety Commission for the opportunity to provide this submission regarding the application submitted by Ontario Power Generation (OPG) to renew the operating licence of the Pickering Nuclear Generating Station for a ten year term.

The Municipality of Clarington is the host community for the Darlington Nuclear Generating Station and the Darlington Waste Management Facility, which are also operated by OPG. The Darlington and Pickering stations together generate almost 30% of the electricity produced in Ontario, a fact that both of the communities of Pickering and Clarington are rightfully proud of. OPG is the Province's largest and lowest cost clean power generator - nuclear is 99.7% greenhouse gas free something very important when addressing the impacts of power generation and climate change.

Clarington and Pickering have shared many of the same experiences as host communities to nuclear generating stations. The safe operation of the stations has always been our primary concern. The Pickering and Darlington Nuclear Generating Stations have been a safe and reliable source of electricity for several decades, and OPG has worked continuously over the years, and more recently in response to the events at Fukushima Japan, to upgrade and improve the safety systems at both plants. The Municipality of Clarington supports OPG's application to renew the operating licence for the Pickering Nuclear Generating Station.

Another aspect of public safety is emergency preparedness. The Emergency, Fire and Police Services or Durham Region regularly participate with OPG in various exercise drills, evacuation planning and off site training at the OPG Wesleyville facility. With the assistance of OPG, the Municipality of Clarington recently opened a modern emergency operation centre in Newcastle, further demonstrating the commitment by OPG to emergency preparedness and public safety.

There are, of course, other important and compelling reasons to support the license renewal, key of which is maintaining safe, stable, low carbon baseload electricity for Ontarians. Given the excellent operational track record of Pickering Station, and the continuous vigorous safety oversight by CNSC, we are of the opinion that the license renewal is necessary and is in the best interest of the local communities and beyond.

The pending closure of the Pickering Station in 2024 brings the issue of the decommissioning and end use of nuclear stations to the forefront. The Pickering site will be the first nuclear generating station site in Ontario to be decommissioned and repurposed. Preliminary information provided by OPG indicates that this process will require approximately 40 years, although used nuclear fuel will continue to be stored on-site until the long-term management strategy for used fuel is implemented.

Clarington will also face the decommissioning of the Darlington station site at some point in our future. We therefore wish to ensure that the communities which host nuclear generating stations are consulted in the development and implementation of the decommissioning and site re-use plans. In addition, the impact of decommissioning on the host communities must also be addressed. These issues include the effect on the respective municipality's assessment base, the potential decrease in employment opportunities for its residents, and the integration of site's end use into land use plans for the Lake Ontario waterfront.

The Municipality of Clarington has been involved in the end use planning for the Port Granby Waste Management Facility, which is also licensed by the CNSC. The advance planning of the end use of the site has allowed the Municipality and our residents to set out a vision for the decommissioned site. It is our hope that Pickering and OPG will take the opportunity to work together to create a comprehensive end use plan for the Pickering station lands. Further, the end use implementation should be staged such that minimal negative impacts (economic and environmental) are experienced by the community.

We urge OPG and the City of Pickering to collaborate on the development and implementation of the decommissioning and end use plan for the Pickering nuclear site to both manage the effects of the station's closure and ensure that the end use provides long term community benefits.

Last, but not least, OPG has been an excellent corporate citizen in the local communities. It provides annual presentations and reports to Clarington Council and we enjoy a very good working relationship with OPG both at the political level and staff level. We are confident that this partnership will continue and flourish while we work collaboratively.

In conclusion, the Municipality of Clarington supports the application by OPG to renew its operating licence for the Pickering Nuclear Generating Station.

Yours sincerely,

Mayor Adrian Foster
Municipality of Clarington