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Oral Presentation

Submission from the Ontario Chamber of Commerce

In the Matter of

Ontario Power Generation Inc., Pickering Nuclear Generating Station

Request for a ten-year renewal of its Nuclear Power Reactor Operating Licence for the Pickering Nuclear Generating Station

Commission Public Hearing – Part 2

June 2018

Exposé oral

Mémoire de la Chambre de commerce de l'Ontario

À l'égard de

Ontario Power Generation Inc., centrale nucléaire de Pickering

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

Audience publique de la Commission – Partie 2

Juin 2018

Canada

May 3, 2018

ontario chamber of commerce

Louise Levert
Senior Tribunal Officer, Secretariat

Canadian Nuclear Safety Commission
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Ottawa, ON
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Dear Ms. Levert,

On behalf of the Ontario Chamber of Commerce (OCC), I welcome the opportunity to provide this submission in support of Ontario Power Generation's (OPG) 10-year license application for the Pickering Nuclear Generating Station.

For more than a century, the OCC has been the independent, non-partisan voice of business. As Ontario's business advocate, we represent over 135 communities and over 60,000 businesses across the province, all of which are committed to working with government to promote economic growth and prosperity in Canada.

The OCC respects the robust and comprehensive review process of the Canadian Nuclear Safety Commission (CNSC), as it ensures the health and safety of our communities remain paramount as we harness nuclear energy. We believe it is critical to continually review and update Canada's regulatory oversight to allow for no compromise to safety or environmental protection.

Through our annual policy resolution process, our network of local chambers of commerce have advocated for an affordable, reliable, clean and innovative energy system that supports Ontario businesses.[1] Their resolutions have highlighted the need to take advantage of Ontario's nuclear expertise to support both our economy and the global transition to a low-carbon future.[2] It is therefore important to our membership that the OCC demonstrate our support for OPG's 10-year license application for the Pickering Nuclear Generating Station, covering the period between September 1, 2018 and August 31, 2028.

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1 Note: The Ontario Chamber Network has passed a series of resolutions on energy policy in Ontario. These are included in our Current Policy Compendium found here http://www.occ.ca/wp-content/uploads/Compendium-of-Policy-Resolutions-2018-2021-Final.pdf

2 Note: A resolution passed at the OCC AGM in 2018 entitled *Canadian Nuclear Innovation* emphasizes the need for Ontario and Canada to remain a nuclear leader and to leverage our expertise internationally for economic growth. This resolution can be found here http://www.occ.ca/wp-content/uploads/Compendium-of-Policy-Resolutions-2018-2021-Final.pdf

The nuclear industry is clearly an integral part of the Ontario economy, creating jobs across its high-tech supply chain while contributing to local research and innovation initiatives. It is also a source of safe, clean and affordable electricity, critically important to a province that has eliminated coal from its energy mix. Pickering Station currently powers 1.5 million homes and provides 14 percent of Ontario's generation capacity.[3] The continued operations of this plant will provide the province with much-needed electricity while Darlington and Bruce Power's units are refurbished between 2022 and 2024.

Together, the OCC and OPG have partnered to host local events highlighting the value of the nuclear supply chain to communities across Ontario, and advocating for our shared vision of a prosperous Ontario.

This partnership included a recent report, supported by the Canadian Centre for Economic Analysis (CANCEA), containing original quantitative analysis that details the economic impact of continued operations of the Pickering Station to 2024.

That analysis expects the Pickering life extension to contribute over $12.3 billion to Ontario's GDP, as well as support 7,590 full-time equivalent (FTE) jobs per year (arising from direct employment at Pickering, indirect employment at suppliers, and induced spending from wages earned by individuals across all industries) and generate $290 million in annual government revenues ($155 million in federal taxes and $135 million in provincial taxes).[4]

We have heard some criticism of the design of Pickering Station and its reliance on radiation containment systems, characterizing the plant as being unsafe and outdated.[5] Its safety track record, however, speaks for itself.

The safety and security of the Pickering Station is overseen by multiple external oversight bodies which continue to reinforce its impeccable safety rating. In 2016, the CNSC itself issued Pickering the highest possible rating ("Fully Satisfactory") in its Regulatory Oversight Report,[6] and the World Association of Nuclear Operators reconfirmed for a second time Pickering's exemplary safety performance.[7] Furthermore, in 2017, the Pickering Station All Injury Rate of 0.07 (0.07 injuries per 200,000 hours worked) was in line with industry bests around the world.[8]

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3 Independent Electricity System Operator (IESO). 2017. Supply Overview. 2017. http://www.ieso.ca/power-data/supply-overview/transmission-connected-generation

4 The Canadian Centre for Economic Analysis. *Pickering Station Generating Station: Contribution of Continued Operation to the Ontario Economy*. October 2017. https://www.cancea.ca/

5 Ontario Clean Air Alliance. *Pickering Station Unsafe at Any Speed*. 2016. http://www.cleanairalliance.org/pickering-safety/

6 Government of Canada. *Regulatory Oversight Report for Canadian Nuclear Power Plants*. 2016. http://nuclearsafety.gc.ca/eng/reactors/power-plants/regulatory-oversight-report-npp/index.cfm

7 World Nuclear Association. *Advanced Nuclear Power Reactors*. 2017. http://www.world-nuclear.org/information-library/nuclear-fuel-cycle/nuclear-power-reactors/advanced-nuclear-power-reactors.aspx

8 Ontario Power Generation. *Performance Report for Pickering Station Q3 2017*. https://www.opg.com/news-and-media/Reports/PickeringPerformanceReport2017Q3.pdf

Most recently, Pickering completed a Periodic Safety Review in accordance with CNSC's regulations and international standards. The review, which looked at plant operation today in comparison to modern codes and standards so as to identify opportunities to further enhance plant safety, concluded that Pickering is safe today and, with the proposed enhancements (which include $290 million for continued operations, including investments to modernize plant components essential to plant reliability and safety and to increase inspections and maintenance of key reactor components), it will become even safer.[9]

A critical component of OPG's demonstrated commitment to safety extends beyond the walls of Pickering Station and into the communities that surround the plant. The OCC's chamber affiliates across the Durham region attest to the open, transparent and regular communications by OPG through newsletters, mailings and community information sessions providing the opportunity for two-way dialogue on plant operations.

Beyond the Station's demonstrated economic impact and impeccable safety record, the OCC is also aware of the environmental and climate change benefits attributable to OPG's Ontario operations. Nuclear power helped facilitate Ontario's transition to a low-carbon energy mix and achieve the environmental benefits already observed. It is estimated that the continued operation of Pickering Station will reduce greenhouse gas emissions in Ontario by an estimated 17 million tonnes.[10] That's the equivalent of removing 3.4 million cars per year from Ontario's roads.[11] If Ontario were to adopt the federal carbon tax at its cap of at $50/tonne in 2022, that would mean $850 million in avoided carbon costs for the province.[12]

Given the on-going global shift away from GHG-emitting fuels, it is clear nuclear energy is an integral part of the larger low-carbon future. When considering the entire power generation life cycle – including construction, mining, operation and decommissioning – nuclear is one of the cleanest technologies available.

For all these reasons, the OCC believes that continued operation of the Pickering Nuclear Generating Station will have a positive impact on the Ontario economy, its climate change goals and the stability of its energy system. We are pleased to have the opportunity to provide this submission in support of OPG's 10-year license renewal application, and look forward to providing our comments in person at the hearing in May.

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9 Pickering NGS Periodic Safety Review 2 (PSR) Basis Document" posted on opg.com. Specifically the Global Assessment Report (GAR) and Integrated Implementation Plan (IIP) sections. https://www.opg.com/generating-power/nuclear/stations/pickering-nuclear/Documents/PickeringNGS_PeriodicSafetyReview2.pdf

10 Ontario's Nuclear Advantage. https://ontariosnuclearadvantage.com/

11 IBID

12 Canadian Nuclear Association. https://cna.ca/why-nuclear-energy/clean/

Sincerely,

Rocco Rossi
President and CEO
Ontario Chamber of Commerce