



Supplementary Information

Oral Presentation

Presentation from Greenpeace

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

Renseignements supplémentaires

Exposé oral

Présentation de Greenpeace

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**

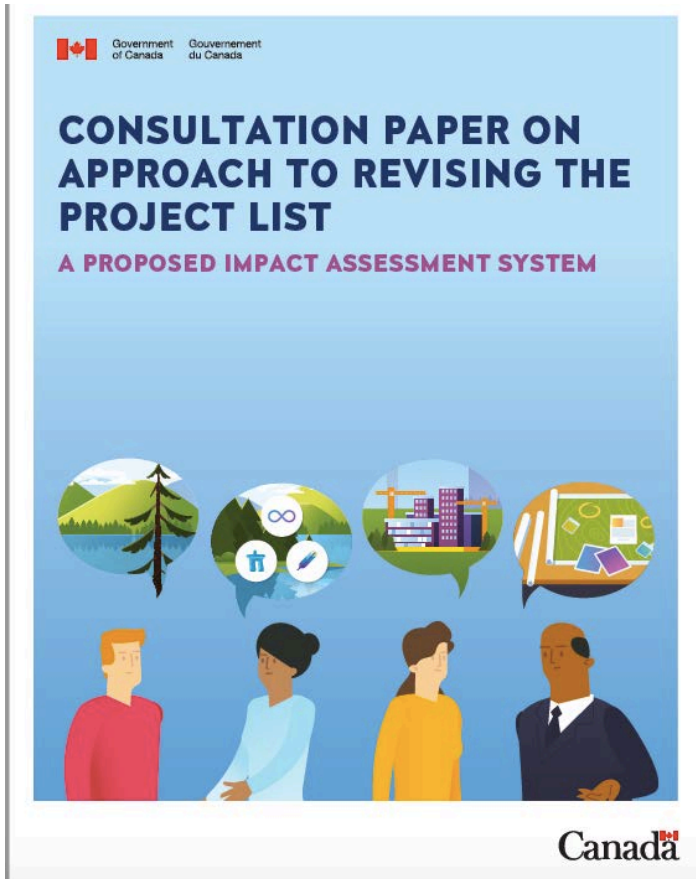
Juin 2018

Preparing for Pickering's closure

*Shawn-Patrick Stensil,
Senior Energy Analyst
May, 2018*



Preparing for Pickering's Closure



- The Commission should require OPG to publish plans on how it will mitigate the negative social and community impacts of Pickering's closure as requested by Durham Region.
- The Commission should ensure a public assessment of alternatives to OPG's preferred delayed decommissioning strategy—including contingency plans for long-term waste management at the site—takes place before OPG is allowed to apply for a decommissioning licence.
- The Commission should request the Minister of the Environment and Climate Change conduct a Strategic Impact Assessment of decommissioning strategies, including long-term waste management strategies, for the Pickering nuclear station under section 95 of the proposed *Impact Assessment Act*.

Simply put, end the procrastination

OPG = the Government of Ontario



- The last level & fifth of defence-in-depth involves mitigating the offsite consequences of accidents.
- OPG's shareholder has authority over policies that can strengthen or erode safety margins.
- The province has a policy supporting the erosion safety margins through its growth policies.
- The province has consistently mismanaged its responsibility for emergency management.
- The province is aware that its policies may result in regulatory sanction

OPG's shareholder has made inadequate provision to protect public safety & the environment

Siting: Declining Safety Margins



- Provincial policies encouraging population growth are making the implementation of emergency plans more logistically challenging – declining safety margins.
- Provincial policies are contrary to the CNSC's stated goal of continuous improvement.

Accepting declining safety margins is compromising safety

Safety Review – Insufficient transparency

ONTARIO POWER GENERATION Report

OPG Proprietary		
Document Number: P-REP-03680-00033	Page Classification: N/A	
Sheet Number: N/A	Revision Number: R000	Page: 1 of 82

File: PICKERING NGS PERIODIC SAFETY REVIEW SUMMARY


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Pickering NGS Periodic Safety Review Summary


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Order Number: N/A
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OPG Proprietary


Prepared by:  March 28, 2018 Date
D. Duncan
Principal Consultant
Kinectrics

Verified by:  March 28, 2018 Date
G. Archinoff
Executive Consultant
Kinectrics

Verified by:  March 28, 2018 Date
L. Watt
Principal Consultant
Kinectrics

Verified by:  March 28, 2018 Date
J. Huang
Senior Consultant
Kinectrics

Approved by:  March 28, 2018 Date
K. Martineau
Department Manager
Kinectrics

Accepted by:  28 Mar 2018 Date
M. Ruffolo
Manager
Pickering Engineering –
Aging Management &
Strategic Initiatives

N-TMP-10010-R012 (Microsoft® 2007)

- The CNSC has reduced transparency related to Periodic Safety Reviews.
- Conflict of Interest: Public Safety versus OPG's profit margins.
- **Request:** The Commission should instruct CNSC staff to strive for higher levels of transparency while carrying out future Periodic Safety Reviews, including proactive disclosure of all safety improvement opportunities and their associated cost-benefit analysis.
- **Request:** Before approving OPG's licence renewal, the Commission should request a list of all safety improvement opportunities considered during OPG's Periodic Safety Review

No Transparency = No Confidence in Safety

Commission & Public Oversight

This licence condition also ensures that operation beyond December 31, 2024 would constitute a change in the licensing basis requiring approval by the Commission or a person delegated by the Commission.

Request: The Commission should reject OPG's request for an unprecedented 10-year licence and approve only a 5-year licence in order to better oversee Pickering's end-of-operations.

Request: The Commission should revise the Licence Control Handbook to ensure that any request by OPG to operate beyond 2024 is review by the public and the Commission.

No Bait and Switch

Conclusion & Recommendations



- In light of the province's consistent mishandling of nuclear emergency response planning, the Commission should reject OPG's application to operate the Pickering nuclear station beyond 2020.
- In response to the Ontario government's policies, which promote population growth and intensification and thereby undermine public safety around the Pickering nuclear station, the Commission should reject OPG's application to operate the Pickering nuclear station beyond 2020.
- The Commission should reject OPG's request for an unprecedented 10-year licence and approve only a 5-year licence in order to better oversee Pickering's end-of-operations.
- Ensure there's an environmental review of decommissioning before OPG applies for a decommissioning licence.

Time to close Pickering: An unreasonable risk

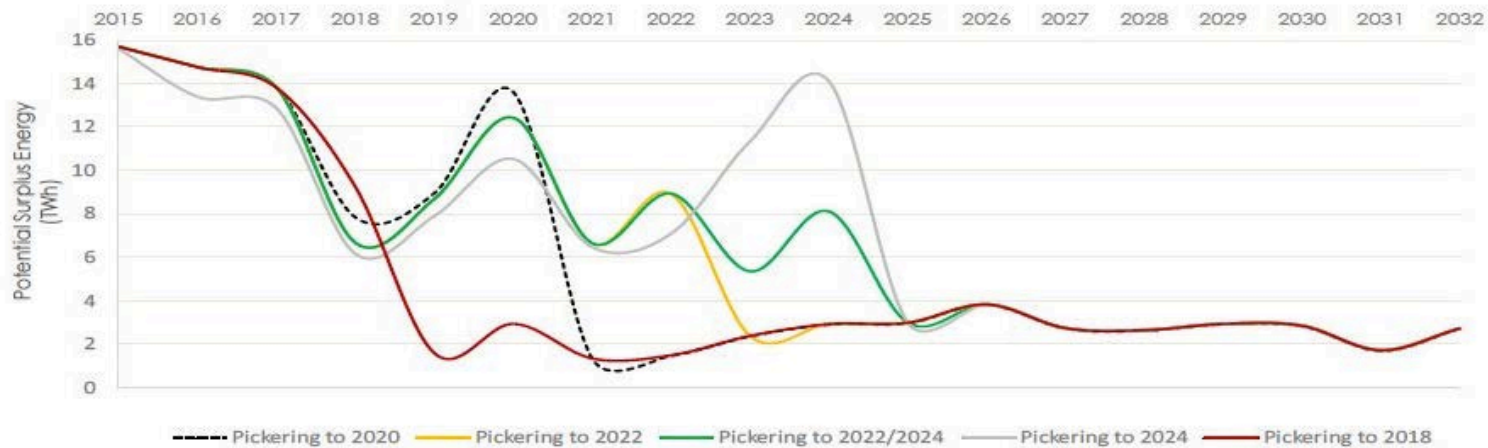
Additional Material

Pickering: All Risk no Reward

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Exhibit F2-2-3
Attachment 1
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Energy production from Pickering increases potential surplus energy



The majority of Pickering's output is exported

Delayed Decommissioning

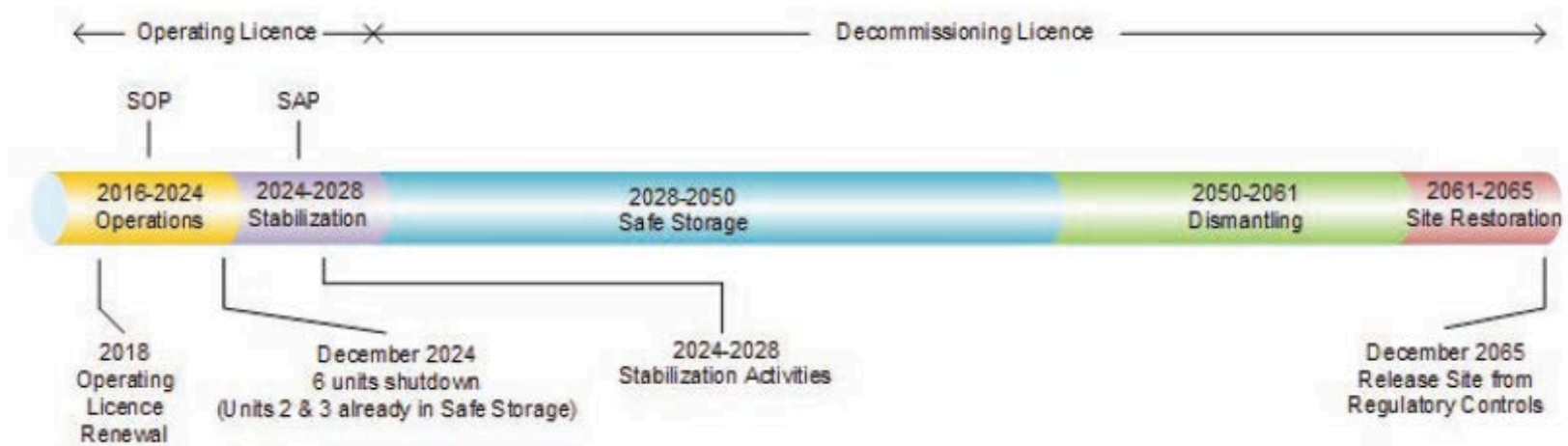
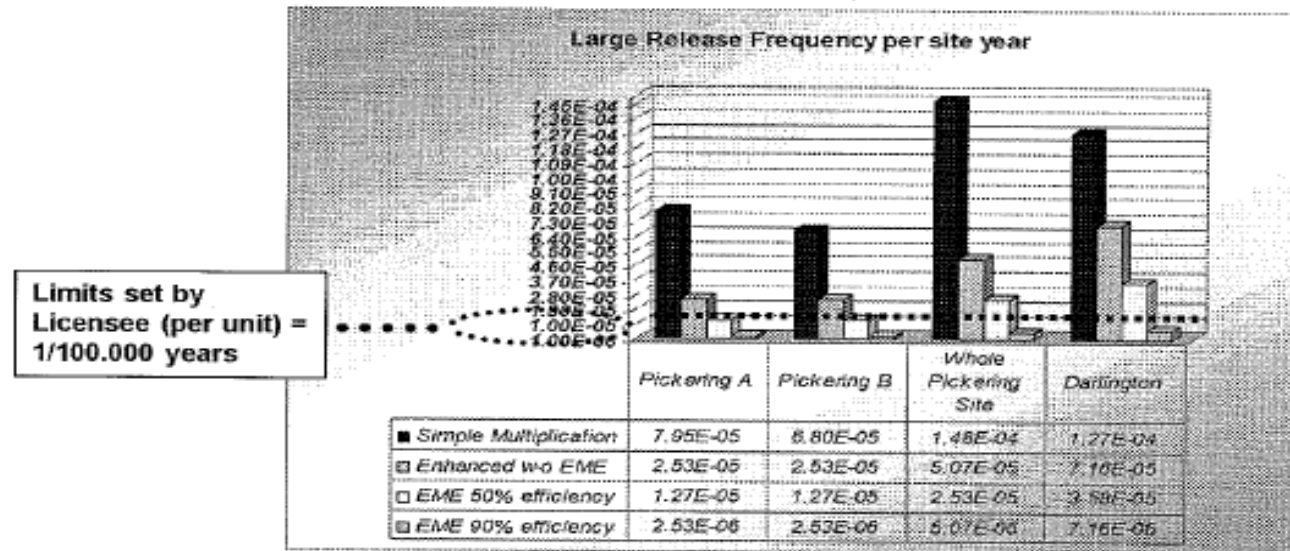


Figure 2 - Pickering long-term plan showing the Sustainable Operations Plan (SOP) and the Stabilization Activity Plan (SAP) within an extended timeframe

Risk Aggregation for Multi-unit Sites

LRF Whole-Site Aggregation

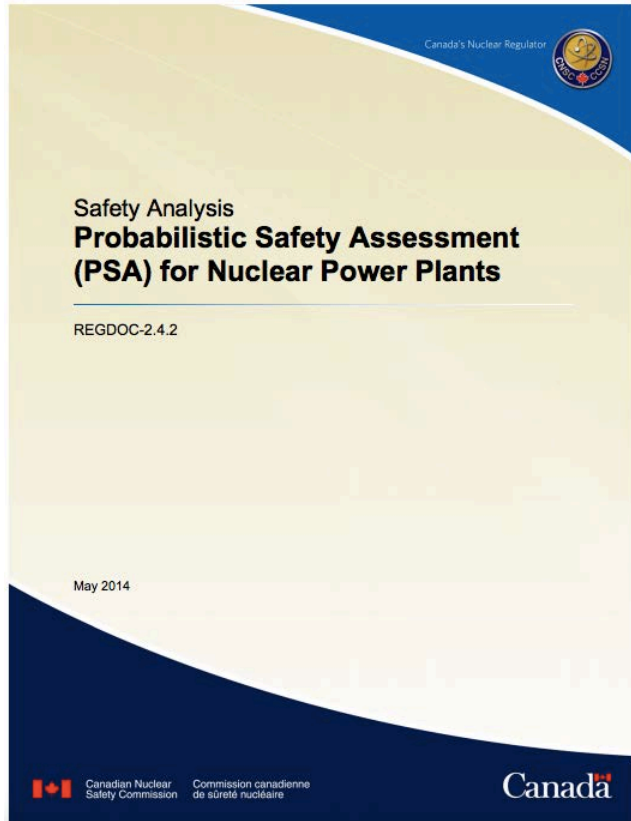


Note:

- 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



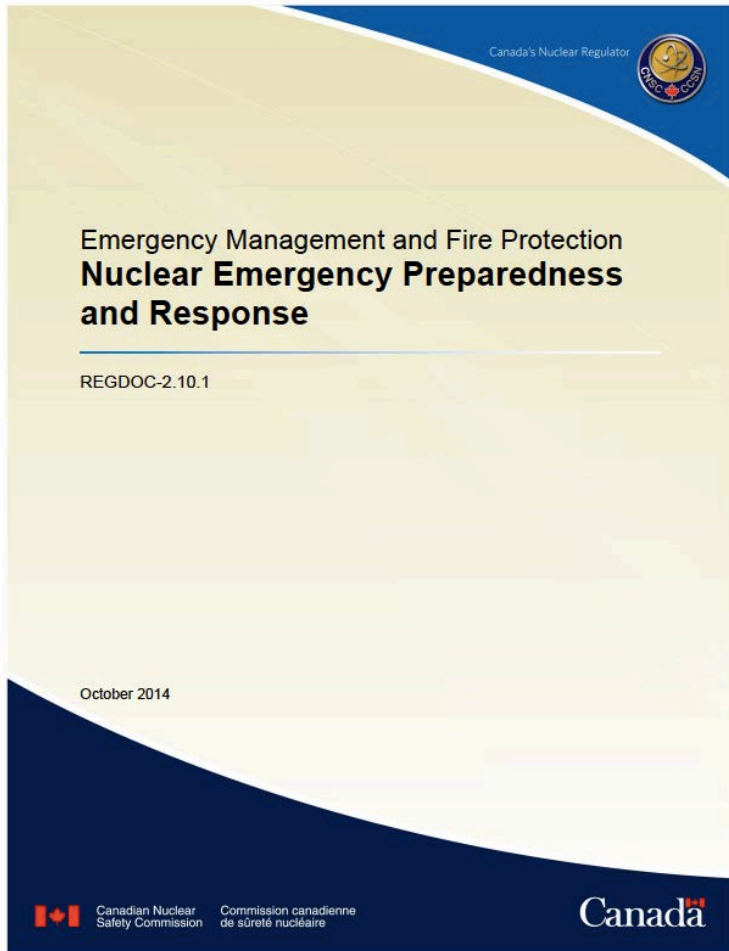
Request: Direct CNSC staff to include a site-wide safety limit in the next iteration of REGDOC-2.4.2, which is scheduled to be updated in 2019.

Request: OPH 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 OPG 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

Gaps identified in REGDOC-2.10.1



- No requirements to inform residents in the Ingestion Planning Zone of their right to order KI.
- Need to strengthen and clarify requirements for making KI readily available to children – pre-stocking of KI in schools & daycares in the Ingestion Planning Zone.

Continuous Improvement of Standards