



**Written submission from the  
Toronto Environmental Alliance**

**Mémoire de la  
Toronto Environmental Alliance**

In the Matter of

À l'égard de

**Ontario Power Generation Inc.,  
Pickering Nuclear Generating Station**

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**Ontario Power Generation Inc.,  
centrale nucléaire de Pickering**

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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**





Louise Levert  
Secretariat  
Canadian Nuclear Safety Commission  
280 Slater St.  
P.O. Box 1046  
Ottawa, Ontario  
K1P 559  
Via: [cncs.interventions.ccsn@canada.ca](mailto:cncs.interventions.ccsn@canada.ca)

May 3, 2018

**Re: Request to continue operating the Pickering nuclear station (Ref. 2018-H-03)**

Dear Commissioners,

For over 30 years, the Toronto Environmental Alliance has campaigned locally to find solutions to Toronto's urban environmental problems. As a not-for-profit organization with over 60,000 supporters, we advocate on behalf of all Torontonians for a green, healthy and equitable city.

Toronto Environmental Alliance (TEA) is concerned by the public safety risks posed by Ontario Power Generation's (OPG) request to continue operating the aging Pickering nuclear station. TEA stands united with other environmental & health organizations in recommending that the Commission reject OPG's request while strengthening offsite nuclear emergency preparedness as requested by the City of Toronto.

Three Mile Island, Chernobyl and, most recently, Fukushima show that the potential for nuclear accidents is not negligible. As seen by Chernobyl and Fukushima, the impacts of such accidents are not necessarily limited to areas near nuclear stations. Environmental contamination and the need for emergency measures to protect the health of residents may occur at great distances from a damaged nuclear station. For this reason we believe it is unwise to approve OPG's request to continue operating the Pickering nuclear station.

There are ten reactors in the Greater Toronto Area (GTA). The Pickering nuclear station is just 30 km from Yonge St. and the Darlington nuclear station is 50 km from Broadview Ave. Given Toronto's proximity to these nuclear stations, it is prudent and responsible to take steps to mitigate or, preferably, eliminate the risk posed by these stations to Toronto residents and the environment.

In regard to mitigating the possible impacts of a nuclear accident at Pickering, TEA agrees with and supports the City of Toronto's request of the Commission to strengthen nuclear emergency response. In November 2017 (EX28.13) and April 2018 (EX33.6), Toronto City Council adopted motions supporting world-class public safety, strengthening nuclear emergency preparedness wherever feasible, and the protection of vulnerable communities. These motions also urge provincial and federal authorities to ensure transparency and that funding is in place for municipalities to oversee nuclear emergency preparedness.

TEA supports the City's request for the province to "expand the pre-distribution of potassium iodide (KI) pills beyond the current 10 kilometre Primary Zone" in an updated Provincial Nuclear Emergency Response Plan (PNERP). Although the government of Ontario released a new PNERP in December 2017, it did not include expanded requirements for KI distribution, but the government instead commissioned a study to assess the desirability of limiting KI delivery and evacuation planning areas to the current 10 km area. TEA is concerned that seven years after Fukushima, and after a long-awaited public consultation on nuclear emergency response in 2017, the province is still commissioning studies to determine the adequacy of nuclear emergency plans.

As a member of the Toronto Cancer Prevention Coalition's Environmental and Occupational Carcinogens Working Group, TEA and many other environmental, health and labour members have expressed continued concern over the excess levels of tritium and other radionuclides found in Toronto's waterways and Lake Ontario, the source of our drinking water.

We are further concerned that the PNERP does not adequately address the possibility of Toronto's water supply being contaminated in the event of a nuclear accident. Toronto's drinking water comes from Lake Ontario, 27% of which comes from the east-end F.J. Horgan Water Treatment Plant which is less than 20 km from the Pickering nuclear station. We understand that the study commissioned by the province will look at possible impacts of an accident on the Great Lakes and drinking water. However, we do not have access to the results of this study at this time. Thus, there is no publicly available evidence to show Toronto's drinking water supplies would be acceptably safe in the event of an accident at Pickering.

As a Toronto-based organization with over 60,000 supporters across the city, TEA is deeply concerned that the emergency planning measures currently in place do not sufficiently consider the needs of Toronto residents. This applies to the emergency measures needed to protect Torontonians in the event of an accident at either the Darlington or Pickering nuclear stations. TEA also supports the City's request to put in place public awareness campaigns to inform Torontonians on how to prepare for a nuclear accident at the Pickering or Darlington nuclear stations.



To mitigate these public risks, TEA asks the Commission to follow through on the City of Toronto's requests and direct OPG and the Province of Ontario to strengthen offsite nuclear emergency preparedness.

Regarding OPG's request to continue operating Pickering it has been broadly acknowledged that most of Pickering's output is surplus. The population density around the station also continues to grow, meaning the potential social and human health impacts of a major accident could be much worse than Chernobyl or Fukushima. TEA believes that it is unwise to continue operating an unneeded nuclear station in such a densely populated area. TEA urges the Commission to reject OPG's request to continue operating the Pickering nuclear station.

Sincerely,

Franz Hartmann  
Executive Director