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**Written submission from
SOS Great Lakes**

**Mémoire de
SOS Great Lakes**

In the Matter of

À l'égard de

**Regulatory Oversight Report for Canadian
Nuclear Power Generating Sites: 2017**

**Rapport de surveillance réglementaire des
sites de centrales nucléaires au Canada : 2017**

Commission Meeting

Réunion de la Commission

November 8, 2018

Le 8 novembre 2018

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laissée en blanc*



October 9, 2018

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, PO Box 1046, Station B
Ottawa, ON K1P 5S9

Email: cns.interventions.ccsn@canada.ca

Re: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites, Public Comment Period (Rev 1).

Dear Representatives of the Commission:

SOS Great Lakes (SOSGL) is a volunteer organization opposing the deep burial of nuclear waste in the Great Lakes Basin, currently focusing on OPG's plan to construct a deep geological repository (DGR) for nuclear waste by the shore of Lake Huron. SOSGL maintains that nuclear waste should not be buried anywhere in the Great Lakes Basin due to the potential for contamination of the world's largest supply of fresh water. In spite of this risk, a Joint Review Panel (JRP) under CEAA 2012 supported by the CNSC approved the DGR plan with almost 100 conditions. We have argued to the Ministry of the Environment and Climate Change that this EA process, CNSC involvement and the JRP Report were deeply flawed.

We are not anti-nuclear. We are informed citizens who live within the Great Lakes Basin, writing to react to the inadequate basis for reporting on the performance of our nuclear facilities. While our comments relate to our particular experiences as neighbours of the Bruce Nuclear Plant, they also reflect the grave concerns shared by supporters who reside on the Great Lakes, near the provinces other 17 nuclear reactors, the concerns of those who live within the wide danger zones of storage sites, and along the transportation routes where nuclear waste is moved across Ontario. The province's nuclear operator has facilities, both existing and planned, that must respond to the real and growing incidence of risk, malfunction and accident, including to changing climate where extremes of weather on the Great Lakes, and increasingly, and predictably, along the shore of Lake Huron near the Bruce Plant, have not been adequately assessed or planned for.

We have found your Report to be unreasonable in the lack of assessment of the potential for accidents singly or in cumulative scenarios in the future, and have not found the report to be forthcoming on all incidents, accidents and regular releases into the air, ground and water at the Bruce Nuclear facility, or at the WWMF, that we, as local citizens, have become aware of through regular contact with community members, through news media and incident reports on small, medium and larger occurrences and conditions.

The accidents that occur in Ontario and across the globe must be recognized as the warning to the Commissioners that the combination of slack reporting with lack of diligence of the operator leads to lack of preparedness; and that under rating of incidents, conditions and accident has led to a lack of preparedness. This lack of preparedness for emergency poses the single greatest risk to human and environmental health in Ontario and the Great Lakes.

The issue of cumulative effect caused by nuclear accident is of increasing significance as the province discusses the one hundred-year plans for convergence and overlap of out of date nuclear generating plants, construction activities during decommissioning and rebuild, and the ill-conceived plans for deep burial of intermediate and high-level waste in the Great Lakes Basin. And yet, there is no mention in this Report of the future activities that will influence the ongoing and future safety of the Bruce facility.

Other points that have emerged from our consideration of the Report include:

- that the assessments read as if they are biased and over congratulatory, not plausible
- that the ratings for Bruce A and B were 'fully satisfactory' and 'unchanged' from the intergrade plant ratings for the previous year' (page 171), despite the fact that changes must have occurred since the 2016 report
- that there was not no evidence of improvement, or measurement of improvement has been described by this year's report over previous years
- that there are few references to data or statistics in the descriptions of incident, performance or improvement from which a peer reviewer could base a judgement of veracity of reporting
- that the language of performance assessment is excessively general, and could apply to any industry or workplace, when the duty of care in the nuclear environment should be of exceptional and specific diligence and reporting rooted in science (e.g. 3.4.2 Human Performance Management)
- that assessment of Operating Performance (page 179) should never 'exceed performance objectives' and 'be fully satisfactory' if the regulator and assessor have high levels of critical ability, and the levels of management have been set to a high standard. This is an impossibility and demonstrates lack of credibility in assessment
- that severe accident recovery assessment has never been conducted for a multiple emergency scenario at the Bruce Site, and its effect on the Great Lakes, therefore the claim that, 'the effectiveness of severe accident management guidelines through ongoing exercises and plant drills at both Bruce A and B met acceptable standards, cannot be a true statement or assessment. The bar and criteria have been set too low
- that the safety systems in place for the community end at the borders of the Bruce site, and the operator has no provision for extension of safety beyond those boundaries; this should be of extreme importance to the overall evaluation of emergency preparedness and safety for the people and environment of the Great Lakes and for the people of Bruce County, including under risk of explosion and fire and release, in combination and under conditions of very severe and unusual weather such as tornado and rising water
- the reported evaluation of Estimated Dose to the Public (page 189) of radiation is baseless, because there are no health statistics on effect to the locality of radiation in water, air or ground specifically for the incidence and direct affect of radionuclides on the most vulnerable sectors of our population. Continued attempts by the concerned members of the community of Great Lakes members to engage the government in undertaking such studies have been thwarted year after year
- under Protection of the Public (page 193), the underreporting of incidents, and the lack of communication by the operator to the public on incidents of release in air, water and to the ground is increasingly and openly discussed in the community regarding how many of the nearby town and rural population are no longer drinking the lake water even if processed through the municipal system due to perceived high levels of radioactive concentrations in the drinking water. The active contamination of outlets from the nuclear plant at Baie du Dore are consistently discussed by nearby community

members, as well as by resident workers at the plant in casual conversation. There is no note of either of these factors in 'Protection of the Public'

-there is no discussion of change management, or the timelines for future construction and its potentially adverse effect on the performance, operation or environmental and human safety that will be necessary in the coming years at Bruce A, B and the WWMF. Not only past performance, but future planning should be aspects of reporting.

We are increasingly reliant on the CNSC for regulation and protection of our provincial and national environment, society, resources and people; your role as critical reporter, advisor, legislator, especially as the federal IA nears completion, has never been more important.

We urge the Commission to take a more critical review of the Report and to consult independent advisors and new peer experts, as we find the Report lacks precautionary thinking, is imprecise in its analysis of activities, lacks critical approach and is overly confident in assessment.

Whether in Ontario, or along the St. Lawrence River, or on the American side of the Great Lakes our supporters are immediately affected now, and will be in the future by the actions that the Commission takes to bring thorough and acute regulation of the operators, and serious consideration of the full range of adverse effects to protect against emergencies that will occur in the production of nuclear power and its by-products.

Yours truly,



Jill Taylor, President
on behalf of the Board of SOS Great Lakes.