Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

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Oral presentation

Submission from the Canadian Association of Physicians for the Environment

In the Matter of

Ontario Power Generation Inc.

Application to renew the Power Reactor Operating licence for the Darlington Nuclear Generating Station

Commission Public Hearing
Part 2

November 2-5, 2015

Exposé oral

Mémoire de l'Association canadienne des médecins pour l'environnement

À l'égard de

Ontario Power Generation Inc.

Demande concernant le renouvellement du permis d'exploitation pour la centrale nucléaire de Darlington

Audience publique de la Commission
Partie 2

2-5 novembre 2015

Canada

Canadian Association of Physicians for the Environment

Submission to: **The Canadian Nuclear Safety Commission (CNSC)**

Re: **The License Renewal for the Darlington Nuclear Station**

Submitted by: **Cathy Vakil, MD, CCFP, FCFP, Board of Directors, CAPE**

Date: **September 28, 2015**

The Canadian Association of Physicians for the Environment (**CAPE**) is a non-profit organization with approximately 6000 members across the country. CAPE was established 22 years ago by physicians who understood the many ways in which the environment can shape the health of people. Our organization is directed by an 11-person Board composed primarily of medical doctors.

I am here today to express CAPE's concern about the renewal of the Darlington Nuclear Plant License in the absence of:

- A publicly available assessment of the health effects of a Level 7 accident as defined by the International Atomic Energy Agency (**IAEA**)'s International Nuclear Event Scale (**INES**); the report "Study of Consequences of a Hypothetical Severe Nuclear Accident and Effectiveness of Mitigation Measures" on the CNSC website does not include such an analysis
- An Emergency Plan which reflects the assessment of a Level 7 accident; the report above on the CNSC website does not include this analysis
- A Pre-distribution Plan for Potassium Iodide (**KI**) to all residents in a 50 kilometre radius, as is the case in other countries such as Switzerland which has studied the effects of a Level 7 accident in detail

In addition, the request for a 13 year licence is unprecedented, unreasonable and unsafe, because the public needs input on and review of OPG's operations on a regular basis, and a

13 year licence would eliminate the opportunity for public participation for the next 13 years. In the past, nuclear operators have requested licences for a maximum of 2-5 years, allowing the public to give input every 2-5 years. The public deserves the right to scrutinize the OPG Darlington rebuild sooner than 2028 because:

- The CNSC has shown that it is not a reliable watchdog for Canada's nuclear industry, and the public needs to be able to scrutinize its regulatory activities on a regular basis.
- With major nuclear accidents occurring worldwide about every 10 years, and triggering analysis of safety plans, consideration of safety upgrades and reviews of safety standards, a review open to the public would not occur for another 13 years which could be many years after another major accident.
- In the past, every stage of planning and construction of reactors required a separate licence, each scrutinized and analyzed, whereas OPG wants to do the decommissioning, rebuilding, commissioning and operating under the same licence which would have much less public oversight.
- Canadian taxpayers take the financial risk in terms of insurance in case of accident (due to the Nuclear Liability and Compensations Act, which alleviates the OPG from paying more than $1 billion in the case of a nuclear accident) so they should have the right to review OPG and CNSC's operations and plans more often than every 13 years.

As a physician, I have concerns about the health effects of the nuclear industry, from uranium mining and transport, to low level radioactive emissions from reactors, to lack of a reasonable plan for dealing with the many tons of radioactive waste we already have stockpiled and continue to accumulate, to risk of nuclear weapons proliferation, to the very real risk of a major nuclear accident, as well as the CNSC's continued stance that the nuclear industry is safe, which clearly is untrue. I recommend, on behalf of Canadian Association of Physicians for the Environment, that the 13 year licence for Darlington Nuclear Station not be granted.

Cathy Vakil MD, CCFP, FCFP