

The Canadian Environmental Law Association (CELA) supports *EX 16.46: Request for the Government of Ontario to Close Pickering Nuclear Station in 2018* presently before the Toronto Executive Committee.

The Pickering Nuclear Generating Station (PNGS) should be closed in 2018. The Plant is over forty years old and is fast approaching the end of its operational life. In addition to the reasons for closure cited in the motion itself, emergency planning in the event of a large-scale accident at the PNGS is woefully inadequate.

For example, the requirements for alerting are not even fully in place in the 10 km Primary Zone around the PNGS despite decades of plant operation, and there has not been sufficient preparation for the “shadow” evacuation that would certainly occur voluntarily beyond the 10 km zone. The Durham Region Nuclear Emergency Response Plan (DNERP) states that it is “assessed that the majority of evacuees will make their own arrangements for alternate accommodation” in the event of a nuclear emergency.<sup>1</sup> CELA submits that the majority of evacuees are likely unaware of this expectation.

The proffered alternative to evacuation, “sheltering in place,” would provide only limited protection to the public, depending on the radionuclide release scenario, time frame for the release of a radioactive plume, and type of building that people are “sheltering” inside. Another example of the insufficiency of preparedness for a severe accident is the lack of pre-distribution of KI beyond the Primary Zone, and the insufficient quantities of KI in stock compared to the population within the 50 km Secondary Zone.

We need a careful, detailed emergency plan because if there were a catastrophic accident at one of Ontario’s nuclear power plants, widespread health, safety and environmental consequences would be expected unless immediate and effective steps were taken for public protection. As long ago as 1988, Commissioner Kenneth Hare reported in *The Safety of Ontario’s Nuclear Power Reactors* that the health effects from a catastrophic accident at the Pickering nuclear power plant could amount to 37.5 prompt fatalities; 6011 early injuries; and 9,700 cancer deaths if most of the fission product inventory escaped<sup>1</sup> and a plume was directed across Metropolitan Toronto.<sup>2</sup> In such a catastrophic scenario these numbers would be increased today as a result of population growth.

The risks of continuing to operate the Pickering Plant beyond its design life are simply too great. The large population around the Pickering Plant would be extremely vulnerable in the event of a

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<sup>1</sup> Durham Region Nuclear Emergency Response Plan, May 2016, at page 36. Online: <https://www.durham.ca/departments/demo/DRNERP.pdf>

<sup>2</sup> *Ontario Nuclear Safety Review, 1988*, at page 162, Table 15, qtd in “Emergency Planning at the Pickering Nuclear Generating Station: Submissions by Canadian Environmental Law Association,” 3 May 2013, at page 12. Online: <http://www.cela.ca/sites/cela.ca/files/899PickeringEmergencyPlanning.pdf>  
**Canadian Environmental Law Association**

nuclear emergency, and emergency preparedness measures remain inadequate. It is time to shut the Pickering Plant down.

Sincerely,

**CANADIAN ENVIRONMENTAL LAW ASSOCIATION**

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