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April 21, 2021

By Email: Chrystia.Freeland@parl.gc.ca

The Honourable Chrystia Freeland
Deputy Prime Minister of Canada
Ottawa, Ontario

Dear Ms. Freeland:

Re: Putting safety of GTA residents first

We are writing to request that the Government of Canada direct the Canadian Nuclear Safety Commission (CNSC), pursuant to Section 19 of the *Nuclear Safety and Control Act*, to obtain reliable scrape samples from the Pickering Nuclear Generating Station's (PNGS) pressure tubes on an annual basis, commencing immediately. Given the unprecedented nature of running this nuclear station past its design life without undertaking a full replacement of the pressure tube system, we strongly believe that such a regime is a minimum requirement for assuring public safety.

[As reported](#) in the *Globe and Mail* on March 23, 2021, in August 2018 the CNSC renewed the operating licence for the PNGS despite that fact that Ontario Power Generation (OPG) had failed to supply the CNSC with reliable data (scrape samples) to show that the PNGS's pressure tubes are still fit for service.

According to Dr. Sunil Nijhawan, a nuclear engineer and consultant who once worked for OPG and specializes in accident and safety assessments, in a worst-case scenario a ruptured pressure tube could lead to a [series of "cascading failures not unlike what happened at Fukushima"](#).

We believe that it is reckless to put the [safety](#) of millions of GTA residents at risk without direct evidence about the integrity of the PNGS's aging pressure tubes.

CNSC's Failure to Put Safety First

On March 30, 2021 [we wrote](#) to Ms. Rumina Velshi, President of the CNSC, and requested her to direct OPG to obtain scrape samples from the PNGS's pressure tubes to permit an evidence-based scientific analysis to determine if they are still fit for service.

Unfortunately, on March 31, 2021 the [CNSC dismissed](#) our request on the grounds that our letter did "not raise any new evidence."

The irony is that this is exactly our point: we need new evidence (i.e., reliable data) to determine if the PNGS's pressure tubes are still fit for service. To obtain this new evidence OPG must scrape samples from the PNGS's pressure tubes.

On April 7, 2021 [we wrote](#) to Ms. Velshi to re-iterate our belief that it is reckless for the CNSC to allow the PNGS to continue to operate without direct evidence about the integrity of its pressure tubes.

In addition, we asked her to explain what information she has to assure the millions of people living around this station that the PNGS's pressure tubes are still fit for service despite OPG's acknowledgement that many of its previous samples were worthless due to contractor errors. The erroneous data collected by OPG's contractor not only makes it impossible to assure the integrity of Pickering's pressure tube system, it also undermines the utility's ability to track changes in tube integrity. These are serious concerns, but the CNSC has chosen to turn a blind eye despite the fact that it flagged the erroneous data supplied by OPG in the first place, but never followed up with a request for new accurate measurements.

No CANDU nuclear plant has operated as long as the Pickering Station without full tube replacement. Allowing Pickering to continue to operate with such a highly aged system of pressure tubes and then not having accurate information on the state of these tubes is reckless in our view.

On April 13, 2021 we [received an email](#) from the Secretary of the CNSC stating that Ms. Velshi would **not** be responding to our letter of April 7, 2021.



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Conclusion

The *Nuclear Safety and Control Act* requires the CNSC to regulate the use of nuclear energy to prevent an “unreasonable risk” to the health and safety of persons. Unfortunately, it appears that the CNSC is not putting the safety of GTA residents first.

Therefore, we are requesting the Government of Canada to direct the CNSC to fulfill its statutory mandate by directing OPG to obtain reliable scrape samples from the Pickering Nuclear Station’s pressure tubes on an annual basis, commencing immediately.

We understand that obtaining new samples will be costly for OPG. However, these costs would be dwarfed by the human and economic costs of a serious accident at this aging station, especially given the fact that more people live within 30 km of this station than any other nuclear station in North America. A precautionary approach is absolutely necessary, and any costs incurred will be the direct result of OPG's failure to obtain proper measurements in the first place.

Yours truly,

Jack Gibbons
Chair

Angela Bischoff
Director