9 august 2011

Open letter to

Mr. Michael Binder, President of Canadian Nuclear Safety Commission

# Is a nuclear accident ‘’in preparation’’ in Gentilly-2?

## Summary

The painful experience of the collapse of a huge concrete slab in the Ville-Marie tunnel has once again reminded the collective consciousness that infrastructure accidents can be ‘’in preparation’’ for a long time. An open collective letter addressed to the Canadian Nuclear Safety Commission (CNSC) requests information in order to stop the ‘’preparation’’ of the threat of a potential nuclear accident in Gentilly-2, the single operational nuclear reactor in Québec.

An alliance of several ecological organizations in Canada is submitting to the *Canadian Nuclear Safety Commission* (CNSC) a request that the *Nuclear Safety and Control Act* (NSCA) of 1997 be fully respected. Regarding nuclear activities, the Act of 1997 can be summarized thus. Paragraph (a): ‘’*prevent unreasonable risk”* and paragraph (b): *to disseminate objective scientific, technical and regulatory information to the public*. In a collective open letter to CNSC president Dr. Michael Binder, and to CNSC staff, the alliance presents evidence, first that the CNSC has yet to fully inform the broad Canadian public about several safety issues that plague CANDU reactors, and second that in June 2011 the CNSC has granted permission to Hydro-Québec to refurbish its Gentilly-2 nuclear reactor without having in hand the normally mandatory *Safety Analysis Report*. This decision is not in the direction of *‘’preventing unreasonable risk”* as stipulated in the NSCA.

The alliance requests answers to 10 precise questions by Ocober first. The complete letter is available on the web site:

http://www.sortonsquebecnucleaire.org/

**Question #1**: Why did the CNSC invoke Article 7 of the NSCA which permits the CNSC to exempt any party from the application of the Act. Through this recourse Hydro-Québec has been allowed to submit its *Safety Analysis Report* by December 2011. Since Fukushima the

CNSC admits the possibility of severe nuclear accidents with CANDU reactors, which leads to **question #2**: isn't this decision diametrically against the spirit of the NSCA?

**Question #3** is this: Given that CNSC staff has been working closely with Hydro-Québec on refurbishment plans, why doesn't the CNSC divulge to the public the problems that have prevented Hydro-Québec from delivering in time its *Safety Analysis Report*?

The alliance notes the following statement in the June 2011 CNSC decision document : ''*The Commission strongly expects Hydro-Québec to begin refurbishment activities as soon as possible if this option is pursued"*. This leads to **question #5** : ''Isn't there an unreasonable risk imposed on the public by encouraging Hydro-Québec to proceed with refurbishment *as soon as possible* without knowing the design modifications that Hydro-Québec will bring into the refurbishment and that will presumably be described in the *Safety Analysis Report* ?''

A safety analysis report submitted by Ontario Power Generation (OPG) was rejected by the CNSC on 7 April 2008. In a 48-page annex explaining the decision the CNSC noted some OPG deficiencies but it also described many generic safety issues plaguing all CANDU reactors. This situation was confirmed later in a 268-page CNSC report in August 2009, in which the first paragraph of the executive summary stated:

*''Regulatory and industry experience with operating CANDU reactors has led to the identification of several generic Safety Issues. Despite continuing efforts directed at ensuring and enhancing safety of operating plants, these Safety Issues remain at various stages of resolution."*

**Question # 6**: Why is it that the numerous safety issues that plague CANDU reactors were reason enough for the CNSC to reject OPG's safety report in April 2008, whereas essentially the same safety issues were simply ignored by the CNSC by having recourse to Article 7 in their June 2011 decision regarding Gentilly-2 refurbishment?

Taking note of past earthquakes that were close to 6 on the Richter scale and that have hit Québec and New Brunswick, the alliance asks the CNSC **question #9**: What data are available to the CNSC on the earthquake resistance of eroded high pressure tubes in nuclear reactors? What is the probability that a 6-Richter scale earthquake could cause such tubes to rupture? In August 1983 a high pressure tube had suddenly burst in the CANDU reactor Pickering-2 near Toronto. All pressure tubes had to replaced in a first retubing procedure over a 4-year period.

The final decision regarding this ‘’preparation’’ of the threat of a potential nuclear accident at Gentilly-2 rests with *Premier ministre Jean Charest* who, once having all relevant information and not being subjected to undue pressures from the nuclear lobby, will decide the course of action for present and future generations.

( s ) Michel A. Duguay,

Professor in the Dépt. Génie électrique et génie informatique, Université Laval, Québec, Qc G1V 0A6.

Coordinator of *Mouvement Sortons le Québec du Nucléaire* (MSQN)

Bur : (418) 656-3557 - Portable : (418) 802-2740

And 70 cosignatories