



**Oral Presentation**

**Exposé oral**

**Written submission from  
Jennifer Logan**

**Mémoire de  
Jennifer Logan**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**BWXT Nuclear Energy Canada Inc.,  
installations de Toronto et Peterborough**

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Application for the renewal of the licence for  
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les  
installations de Toronto et Peterborough

**Commission Public Hearing**

**Audience publique de la Commission**

**March 2 to 6, 2020**

**Du 2 au 6 mars 2020**

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## Intervention Re: BWXT Licencing Renewal Request

January 27, 2020

Senior Tribunal Officer, Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

Dear Sir Madam

I wish to submit an intervention to the CNSC Review Board for the BWXT Licencing Renewal Application Peterborough site. I am a stakeholder, a resident of Peterborough for the past 20 years. My two children attended Prince of Wales school which is near the BWXT site.

The concerns of this intervenor regarding this application pertain to:

1. Discrepancies in the scope of licence: one licence overarching two sites (Toronto and Peterborough) with different structures, locations, community implications are not in the best interests of the residents of Peterborough.
2. Lack of community awareness and involvement in the safety implications and safety plan.
3. Lack of liability insurance for members of the community affected by potential contaminated accidents at the plant.

For the reasons detailed below, I find BWXT's request for a 0-year licence is premature and should not be granted.

**Recommendation No 1:** In item 1.1 of the BWXT licencing document, BWXT wishes to extend its Toronto operations which uranium pelleting operations to the Peterborough site. BWXT requests an overarching licence for both sites (BWXT Nuclear Energy Canada Inc., 2018, p. 6-7).

BWXT has not provided a detailed business plan for the Peterborough site. In addition, the Toronto and Peterborough sites differ in age, structure, size and proximity to residential homes, school, hospitals (all of which are within a 2 km radius of the Peterborough site). Given these omissions and discrepancies I request that each site (Toronto and Peterborough) have individual licencing requests separate from each other including a 10-year business plan for community review.

Further in item 1.2 of the licencing request, a photographic image is given of the Toronto site. In the image the Toronto site appears to be located in mostly an industrial, commercial location of Toronto (BWXT Nuclear Energy Canada Inc, 2018, p. 7-8). In contrast, the image of Peterborough in the document is not a photograph but a crude map of the site. A photographic image would show the obvious differences between the tow sites. The Peterborough BWXT site is in the heart of a residential area. Most concerning is Prince of

Wales, an elementary school is located across the street from BWXT. Children our most vulnerable play in the school yard only 20 metres away.

Will one license for two sites situated in two different communities best meet the safety needs of our community?

We only need to look at Waverly, Ohio. In April 2019, Pike County School District closed a middle school after radioactive material was detected (Associated Press, 2019). Zahn's Corner Middle School detected uranium and neptunium 237 in the air outside the school. The school was four miles away. Prince of Wales School is 20 meters away. The risk is not worth the benefit.

### **Recommendation No 2.**

BWXT licencing document implies their practices are safe. According to item 2.12 BWXT has implemented a "safety culture" ensuring little risk to the community (BWXT p. 16). In item 2.4.3 BWXT uses a "What-if" Safety Analysis which consist of identifying the event, the event initiators and consequences of the event. The licencing document dose not outline specifics of the "What ifs" (i.e. uranium exposure, waste contaminant exposure or others?) and their implications for the community.

People of Peterborough have trusted corporations to keep them safe in the past. The People of Peterborough have also been betrayed by corporations in the past as witnessed in the critically acclaimed documentary "Town of Widows."(CBCdoc.Pov, 2019) Many employees and their family's had to fight for compensation related to the toxic exposure to chemicals at a corporation that was situated at the same location as BWXT is now.

Community history, lost lives, past traumas matter. One hopes we learn from history become more vigilant not make the same mistake twice.

This applies to the licencing agreement and the recommendation that licencing must include a detailed explanation of the "What Ifs" and the community's role in safety and emergency preparedness.

### **Recommendation No 3.**

In the licencing request there is no language about liability insurance held by the BWXT safeguarding the community stakeholders if an accident/contaminant exposure as a result of plant activities.

I again refer to the history of a corporation in Peterborough where workers and their families had to fight for compensation after safety practices were not upheld and years of exposure to toxic contaminants resulted in disease or death.

Therefore, a caveat and recommendation of licencing must include a financial assurance in the form of liability insurance rewarded to workers, families, residents of Peterborough should exposure occur.

## **Conclusion**

In conclusion, as a stakeholder and resident of Peterborough, I am concerned about the safety issues involving the 10-year licencing request by BWXT.

My recommendations include:

- A new licencing request submission with detailed business plan for the Peterborough site, separate from the Toronto Site.
- The licensing request must include a more detailed safety plan explaining “What If’s” and how the community is implicated.
- Language regarding liability insurance for community members potentially affected by contaminants/accidents be included in the licencing request.

For these reasons, the licencing request should not be granted at this time.

Yours Sincerely

Jennifer Logan

## References

BWXT Nuclear Energy Canada Inc. (November 2, 2018). Licence renewal application revision.

The Associated Press. (May, 2019). Plant contamination worries, prompts closing of ohio school. <https://www.ctvnews.ca/world/plant-contamination-worries-prompts-closing-of-ohio-school-1.4424687>

CBCDocs.POV. (August, 2019). Town of Widows. [https://www.cbc.ca/cbcdocspov/m\\_episodes/town-of-widows](https://www.cbc.ca/cbcdocspov/m_episodes/town-of-widows)