



**Written submission from
Robert Gibson**

**Mémoire de
Robert Gibson**

In the Matter of the

À l'égard de

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

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

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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My name is Robert Gibson I would like to request to intervene in writing regarding BWXT'S application.

It is concerning that the CNSC did not recommend an Environmental Assessment for BWXTs application in section 2 of BWXT application report. This would show social, economic and environmental considerations and whether or pelleting uranium makes economic sense (Tadros, 2019, p 10). Without looking at the economic impacts it is difficult to say if there will be an increased amount of jobs. BWXT has said that there is "no formal business decision to produce pellets at the Peterborough facility" (BWXT, 2019, p9). BWXT is requesting the ability to make pellets without making a business plan for it this it cannot be opposed after it is granted for the period of the license. It is also concerning that an elementary school is next to a potential uranium facility and the report recommending BWXTs application failed to talk about kids in addition, there are numerous residential and recreational properties within a 2 km radius that could be impacted from pollution associated with uranium pelleting in addition to uranium particles which might be 0.1 kg annually or greater there is beryllium ,which is a known carcinogen (Tadros, 2019, p 10). The main risk includes ingestion as kids play close to the ground and vegetable gardeners also play close to the ground. There are some risks to the public which can be shown in Toronto's experience as air emissions have been reported to have uranium. According to the CNSCs report 0.76 kg of uranium can be released into the atmosphere per year from 2011 to 2018 based on the facilities operating license (Tadros, 2019, p 18). Based on Dan Rudka experience in the nuclear industry there are harmful effects of uranium when it enters the lungs. In addition, to this the impact of housing and minority populations in the neighborhood should be examined as often is the case it is the poor and marginalized that face the brunt of environmental pollution. It is known that hydrogen will be

needed if pelleting is used (Tadros, 2019, p 7) which will cause a safety risk in the event of an explosion as a school is in the immediate vicinity of the plant the added risk is high for kids who have limited political power(Tadros, 2019, p 3). In January 2017 there was a fire at the Toronto facility (Tadros, 2019, p 55) while it was minor and extinguished it shows that there is the possibility of a fire that if large could lead to an explosion even if it is unlikely. On November 25 Zach Ruitter expressed concerns about decreased property value an additional risk that was discussed in the intervention was tourism (Ruitter, 2010). Carol Winter shared an event where residents from Port Hope shared that they were told that everything was safe but, it did not end up being true. In addition to this there is a concern that As Low as Reasonably Achievable (ALARA) is being used for regulations (Tadros, 2019, p 31). This is because there is still risks under ALARA. According to a report by Robert and DeMatteo beryllium disease was found to be on the rise in the GE plant despite using ALARA. Thank you for your time.

Sincerely,

Robert Gibson

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References

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