



**Written submission from
Robert Steinman**

**Mémoire de
Robert Steinman**

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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CNSC Interventions
January 27 2020-01-27

Robert Steinman

[REDACTED]
Peterborough ON

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Dear CNSC;

I am writing to ask for an intervention against the application by BWXT-Peterborough to the CNSC Commission to extend their licence for ten years and include permission to include the production of make uranium pellets at their facility at the old GE plant Peterborough

This plant is located in close proximity to Prince of Wales and Queen Mary schools and the surrounding neighbourhoods. The junior playground at Prince of Wales School is only 25 meters from the Plant!

The BWXT proposal is to process large amounts of very fine uranium powder that are easily inhaled, ingested, or absorbed into the body through a cut or abrasion. Uranium powder is classified as a Type 1 carcinogen. Uranium powder is much finer than flour. It is so fine that a percentage of it passes through the filtering system and into the local atmosphere.

Uranium dust is already emitted from the facility with the assembly of nuclear fuel rods at this facility and if pelleting begins emissions of this highly carcinogenic dust through the air and in wastewater will increase significantly. We know this from figures provided by the Toronto facility, which currently is producing these pellets. This Toronto facility is now the subject of concerted protest from their local residents.

The new licence, which BWXT is applying for, will allow them to move their pelleting operation to Peterborough. BWXT is maintaining that moving the pelleting operation to Peterborough is only a possibility at this point, but if BWXT is not planning to shut down the Toronto operation, what would be the point in duplicating it in Peterborough?

Citizens are receiving lots of reassurance from BWXT and CNSC as to the safety of this operation. However, how many times have citizens heard the same kind of rhetoric about things, which later turned into disaster for both workers and the general public. The history of GE, here in Peterborough, is one such example. Asbestos was given to their employees to insulate their homes, carrying it away by the truckloads, and the workers that were exposed to toxic chemicals they were told were safe are now fighting an extended battle for compensation for their cancers.

What insurances did their employers and the government provide to them? What assurances for safety were delivered to the residents of Port Hope when they allowed for Uranium processing to be established in their community. The result is now known as **the Port Hope Initiative*** and is the largest environmental cleanup effort in Canadian history. Ottawa is spending \$1.28-billion to contain 1.7-million cubic metres (m³) of low-level radioactive waste in Port Hope and Port Granby.

It now looks as if our City Council is not going to pass a motion asking for permission to be denied for this licence extension and new pelleting expansion to Peterborough. They are doing so even they all agree that such a facility would never be granted zoning to operate in the heart of the City today. So why would we allow for the endangerment of our citizens. This includes school children next door the facility being exposed to increased radioactive pollution for the want of a few more jobs in our City.

Using data from their Annual Compliance Monitoring Report from BWXT's actual uranium emissions from the Peterborough facility and the their Toronto facility, the license proposal includes major increases in annual emissions of uranium dioxide powder --airborne: 3,140 times, from .002 to 6.28 grams, and waterborne: 93,500 times, from 0.01 to 935 grams. A single gram of the very fine uranium oxide powder contains 7.8 trillion individual particles of 0.3 micron size, each a potential cancer cause if inhaled, ingested, or entering a body through a wound. The number of emitted particles would be astronomical - airborne: 134.2 billion new particles wafting through the neighbourhood per day, and waterborne: 20.2 trillion new particles heading through the sewer into the Otonabee River per day. The danger of contacting a potent cancer-causing substance is very concerning, especially for young children who are particularly vulnerable to radiation and the other heavy metals that are needed for the pelleting process. Uranium oxide can also adhere to DNA and cause birth abnormalities.

"There is no safe level of radiation.....Every dose of radiation has the potential to cause cancers, and we know that there are other damaging effects of radiation as well. The history of the radiation industry, all the way back [to] the discovery of X-rays ... is one of understanding that principle."

Dr. Jeff Patterson, immediate past president of Physicians for Social Responsibility (U.S.A.) , and a radiation exposure expert

The morality of proposing this process in such an old facility right next to Prince of Wales school and a high-density neighbourhood is in my opinion reprehensible. Such a facility should be built well away from populated areas. I understand that kids at Prince of Wales School are warned not to play in the woods near the school for fear of contacting toxic residues already produced by the former GE plant. The possibility of more pollution of uranium dust adds to the risk.

Our City Councillors seem to agree that if it weren't for it's non-conforming pre-existing use BWXT would never be given the zoning to build such a facility in the

heart of our city. Yet it looks as if the same Council refuses to pass a motion asking for permission to be denied for this licence extension and new pelleting expansion to their City. I was shocked to hear during the discussion on this motion at Committee of the Whole last week how little research has been done by councillors and staff on this issue. An issue that will affect our citizenry for years to come . Nor did they have any idea if there were any emergency plans in place for a fire, flood or spill in the facility or from the trucks or rail cars needed to transport the Uranium dust to the plant.

Did they know for example that Zahn's Corner Middle School in Ohio was suddenly closed on May 13, 2019 after uranium was detected within the school. And that there is now a class action lawsuit claiming that BWXT and others; ***“through their silence” and “aggressive public relations efforts,” misrepresented that their uranium enrichment operations did not contaminate the surrounding community.****** Does our Council not remember the CNSC's lax regulatory role in the Shield Source Inc. A debacle that occurred here in Peterborough where the company's reports to the CNSC of levels of tritium emissions into the environment were ten times less than actual- for eighteen years.

So now we are to allow the endangerment of our citizens, including school children next door to the facility, to be exposed to increased radioactive pollution for the want of a few more jobs in our City. I count myself as one of the citizens who live within the 2km radius of the plant affected by the increased uranium in my air and water and I can't believe that my governments both federal and local are allowing this to happen.

For all the reasons above I implore CNSC to deny the addition of pelleting to BWXT's licence of operations in Peterborough.

Robert Steinman


Footnotes

* <http://www.waterkeeper.ca/blog/2016/11/8/what-you-need-to-know-about-the-port-hope-area-radioactive-waste-cleanup>

*** <https://www.classaction.org/news/pike-county-ohio-residents-file-class-action-over-alleged-radioactive-contamination-of-properties>