



**Written submission from
Kendra Couling**

**Mémoire de
Kendra Couling**

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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RE: BWXT Nuclear Energy Canada's application to license FFOL-3620.1/2020

As a mother of two young children, I write to you as someone who is concerned about the existing toxic legacy of Peterborough, what impacts the proposed change in BWXT's license will have on our city and what kind of future I am leaving for my children.

According to Figure 2.4 of the BWXT Consolidated ERA, I live downwind of the BWXT facility and within the 2km range expected to experience increased exposure to uranium. I have a vested interest in the outcome of this proposed amendment to BWXT's license.

Peterborough is a fantastic city with many incredible attributes. It has vibrant downtown, engaged citizens and is a wonderful place to raise a family. I am thankful that I came to university here and decided to stay.

But Peterborough is also hurting. Social problems such as the opioid crisis are taking their toll. Housing costs are limiting what housing is available to young people who have just started to gain some independence. Homelessness is pervasive and has resulted in people living in tents, even in winter. And the toxic legacy from over a century of environmental and physical health abuse is in the background of all of this. Previous industries in Peterborough have left toxic soil, water and river sediments for the people of Peterborough to address. Peterborough has been a dumping ground for billion dollar multi-national companies, who then ignore their responsibilities to clean up their facilities because it's too expensive.

And yet, here we are. Another proposal to continue the systematic abuse and industrial contamination of Peterborough's water, soil and residents.

My concerns are as follows:

Cumulative effects

Sadly, Peterborough has an extensive toxic history as a result of over a century of intensive industry. The environmental and health impacts in Peterborough are long lasting. Generations have been affected by the lack of responsibility shown by previous industrial employers who reassured workers that they were taking "every possible precaution" for worker safety.

The impacts to human health and the social fabric of our city is well documented.

Nowhere in this licence application does BWXT explain how increased releases of uranium, due to potential pelleting operations, will interact with the already toxic soils and water found throughout the city, and in particular, surrounding the plant. Would you please let me know how BWXT will be considering these cumulative impacts?

Also, how does BWXT plan to ensure that the proposed significant increases in uranium in our air and water will not result in any impacts to the health of the people of Peterborough?

Precautionary principle

The precautionary principle is not being considered in this application.

Uranium pelleting and fuel bundle assembly has unfortunately been occurring in urban centres for many decades. What was considered reasonable in the past is no longer being considered appropriate in urban centres, and in many cases modern by-laws would not support these uses.

So why are we now considering knowingly allowing increased exposure to uranium in an urban centre already incredibly affected by a toxic legacy?

How is it considered appropriate to allow this kind of use adjacent to neighbourhoods and a public school?

How is it considered appropriate to allow uranium processing in an area where a total of 7 public schools, a hospital and the city's downtown core are within 2 km?

How is it considered appropriate to transport highly toxic materials such as powdered uranium (in standard steel drums) to the core of a city?

How is it considered appropriate to store huge volumes of compressed hydrogen on the BWXT site?

If a picture speaks a thousand words, I suggest that the following image be given your undivided attention and consideration.



Photo Credit: K. Couling

This photo was taken at Prince of Wales Public School, during a community event organized by Citizens Against Radioactive Neighbourhoods. The lights immediately to the right of the image are the BWXT facility. How is this appropriate?

Regardless of all the regulations and policies established to “ensure the safety of employees and residents of Peterborough”, accidents happen. If accidents happen, they should occur outside of a residential area. They should occur where the damage would be the least, should something unforeseen go wrong. They should occur in a facility equipped for such an incident and on a property large enough to limit exposure to innocent people.

In what way has the precautionary principle been used to evaluate this application?

In a few words, it hasn't.

The precautionary principle is being completely ignored.

Property values in Peterborough

In the area surrounding the former GE plant, residents are told not to grow vegetables for their own consumption. The area is financially depressed and houses Peterborough's most vulnerable people. As a result, it has a stigma about it. And yet, BWXT proposes to subject their immediate neighbours to even more contamination!

Similarly, I live within the 2km zone that will be subjected to increased uranium deposition. This concerns me. I have genuine concerns about whether or not I should move from the home and garden that I love, specifically so that my children will be less affected. And yet, moving would mean incurring a greater mortgage and I am not sure we can do it. I feel trapped!

How does BWXT propose to compensate individuals should they not be able to sell their homes due to concerns about BWXT's operations? Take for example the proposed development at 1180 High Street. How will this developer be compensated if no one wants to buy the condos being proposed for that location? I certainly wouldn't want to live across the road from BWXT.

Climate Change

Ontario has already started to experience increased wind and flooding events. Hundred year floods and high wind events are occurring with increased frequency, and are predicted to become even more extreme in the future. Insurance companies and banks are preparing for these events, and building codes are changing in attempts to make buildings more resistant to increased pressures from water and wind.

In reviewing materials to prepare my intervention, I have not seen one mention of how BWXT proposes to ensure that the facility in Peterborough will be capable of withstanding increased weather events as a result of climate change.

What is BWXT's plan to make the Peterborough facility more resistant to increased weather events as a result of climate change?

Given that standing water was documented within the buildings on the GE property during the 2004 floods, how will BWXT ensure the people of Peterborough that future

extreme flooding (as in 2004) will not result in even more releases of toxins into the surface water surrounding the facility?

Every change to a license relating to radioactive and toxic materials requires a comprehensive discussion about climate change. To not do so is completely irresponsible.

Lack of transparency

There is a complete lack of transparency surrounding this license application. The license application and associated public engagement are disingenuous and untruthful.

The license application states an interest for “flexibility” to allow for potential pelleting operations in Peterborough. As per Natalie Cutler (BWXT) in the Peterborough Examiner on December 8, 2019:

*There's currently **no plan** to change our operations. It was a request in our application should the need arise in that lengthy period of time.*

and yet the ERA states unequivocally:

*BWXT NEC **is proposing to consolidate** its fuel pellet production located at 1025 Lansdowne, Toronto, Ontario with its existing fuel bundle assembly operations located at 1160 Monaghan Road, Peterborough.*

BWXT NEC Peterborough – Consolidated ERA 9-Nov-2018

How can a license application state that flexibility is the goal “should the need arise” when another associated document states very clearly that BWXT intends to relocate its pelleting operations to Peterborough?

How can this license application be considered transparent when there is such a clear discrepancy between what is being communicated to the public and what is being reported in the ERA?

My recommendations

1. Deny this license application. Uranium pelleting is NOT appropriate in an urban centre.
2. Should the application not be denied, defer the licensing decision for a period of 1 year with a commitment to more comprehensive public engagement and meaningful consultation, as well as the completion of a comprehensive environmental assessment. This would ensure that the topic of pelleting in Peterborough’s downtown core is discussed in depth and is given the attention it deserves.

3. Should the application not be denied or deferred, limit the licensing period to 1 year with a commitment to more comprehensive public engagement and meaningful consultation, as well as the completion of a comprehensive environmental assessment. This would ensure that the topic of pelleting in Peterborough's downtown core is discussed in depth and is given the attention it deserves.

Summary

The examples I have presented and the questions I have asked are representative of a licensee and regulating body not considering "the big picture". Climate change and the toxic legacy of Peterborough have not been considered at all in this license application, nor have the impacts to the people of Peterborough.

It is not ethical or fair to permit the BWXT Peterborough facility to commence pelleting operations. The city has already endured enough environmental impacts.

Should pelleting be permitted in Peterborough, it is the residents of Peterborough who will bear the weight of increased environmental impacts on behalf of the greater Ontario population. The definition of environmental justice is that environmental impacts are borne evenly across the population. In the case of the Peterborough BWXT facility, the greatest environmental risk is faced by school children and the city's most vulnerable.

My perception of this entire situation is that Toronto is expensive and people are no longer supportive of having a pelleting facility in their neighbourhood. And yet, Peterborough is in need of jobs and isn't in the same spotlight as Toronto. It seems to me that BWXT and the CNSC are feeling the pressure to move the facility to a quieter location where people won't ask the same hard questions.

The people of Peterborough deserve better. They don't deserve Toronto's castoffs.

This is extremely worrisome and insulting to the people of Peterborough, who deserve so much more after living with a legacy they have already been dealt with.

I emphatically say "No" to pelleting operations in Peterborough. A facility outside of the city core is much more safe and ethical.

Sincerely,
Kendra Couling