



Oral Presentation

Exposé oral

**Written submission from the
Committee for Future Generations**

**Mémoire du
Committee for Future Generations**

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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Filed online on January 27, 2020

This intervention is being submitted on behalf of Committee for Future Generations, a group of volunteer advocates from Dene, Cree, Metis, and settler descendants from northern Saskatchewan, who hold the nuclear industry to account for the many impacts that the nuclear industry has imposed on the people and environment not just in our territory but everywhere that the uranium has been transported, transformed and deployed globally.

The BWXT Technologies, Inc. Uranium Processing Facility is not a stand-alone concern. It is only one part of the nuclear fuel chain, beginning with uranium mining and milling and ending with the uncertain dilemma of nuclear waste storage and reprocessing. The impacts along every link of the nuclear industry chain are affecting us now and will continue to create a hazardous risk far into the future.

This uranium dioxide is transported to this facility on busy public highways.

1. How is it allowed to be transported into downtown Toronto on residential streets if it considered too hazardous everywhere else?
2. What is the transportation route?
3. Do people living along the transportation route have the right to know that radioactive materials and radioactive waste materials are transported next to their communities and over their waterways?
4. Are people notified in BWXT Technologies, Inc. public consultation if they are living along a heavily trafficked uranium route shipping tonnes of uranium per day in powder or pellet form?

The uranium U₂O₈ is mined in northern Saskatchewan at remote mine sites. Not since the uranium mines near Uranium City (now nearly a ghost town) and Elliott Lake, Ontario has a uranium mine been located near a community where it would have obvious health impacts on the public. These places are so hazardous to work at that employees are only allowed on site for 2 weeks in and then away for 2

weeks. They are required to wear radiation monitoring devices to determine how much radiation they are exposed to. Even so, there are studies which show that the radionuclides and heavy metals are not remaining confined to the mine sites. These are known to be entering the traditional food chain of the mainly Indigenous people of the region. Since BWXT Technologies, Inc. is located in a high-density population residential area it is questionable how its continued operation is justified.

There is a documented uranium spill at the Key Lake Mill site in 2018, where uranium which had absorbed into the concrete floor of the Molybdenum Extraction Plant seeped through the porous concrete. It was eventually discovered that there were elevated levels of uranium in the ground water that had flowed several meters from the building. The company's experts and engineers are still not forthcoming with a plan to clean up the site. When the CNSC was asked what regulations they have regarding building materials used in such facilities where radioactive and other toxic materials are, the CNSC response was that they do not regulate the building materials. They depend solely on the Canada Building Code which gives guidelines that set minimum standards. In light of this revelation, the public in the vicinity of BWXT Technologies, Inc. should be very concerned. The IEMP done by the CNSC does now show any monitoring is being done beneath the building.

5. How contaminated is the building?
6. What is the plan for protecting the public of the residential area when this business closes and the building must be decommissioned and demolished?

These are serious concerns that must be addressed, the sooner the better.

Port Hope is another example of poorly regulated facilities that contaminated many homes at great cost to clean up and even greater cost to the health of many citizens of that town.

It would be irresponsible of the CNSC to allow BWXT Technologies, Inc. to continue to operate, store and produce these risky hazardous materials in the residential area around 1025 Lansdowne Avenue in Toronto, Ontario. It is time that the CNSC and BWXT do the right thing, close and decommission this Uranium Processing Facility with the greatest of care. The impacts are no longer unknown. The people should not be expected to live with the risks any longer. One mechanical failure, one accident is all it takes.

Candyce Paul