



Oral Presentation

Exposé oral

**Written submission from
Kyle and Brad Blaney**

**Mémoire de
Kyle et Brad Blaney**

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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laissée en blanc*

Filed by email on January 27, 2020

To whom it may concern;

This written intervention is provided to you by ;

Mr. Kyle Blaney; resident of Toronto

Mr. Brad Blaney; resident of Thornhill

We advise the CNSC of our intention to **also** make a verbal submission to the commission and respectfully request that such time be scheduled for us to appear before the commission during the intervention set for March 2,3 2020.

Introduction;

Clarification; who is the only, absolute/ real , “stakeholder” in Ontario Nuclear?

Only Ontario taxpayers and electricity users are the sole “stakeholders” in Ontario’s nuclear business. Every penny going to this business is either borrowed from the market in Gov of Ont guaranteed bonds, or raised from exorbitant power costs due to nuclear costs. Make no mistake; it is our money that drives this business, every inch of it.

Sadly, the CNSC is our sole industry regulator, arbiter and the enforcer- which means we, the Ontario taxpayers are on our own.

The CNCS is responsible for ensuring the licensees meet, or preferably exceed, the generous standards set out by the CNSC for safe operation of a facility. Historically, the CNSC is pretty soft on their licensees, focusing more on shutting out the stakeholder (that is us, the Ontario taxpayer)and giving approvals based much on their view that the nuclear accident(s) could, almost,” never happen”.

Most troubling is the fact that municipal and provincial governments refuse to challenge the CNSC’s sole authority to rule over this site, while allowing the CNSC to ignore legitimate concerns raised by their own constituents.

Residents have every right to be worried; BWXT, the CNSC, city councillors, MPP’s and MP’s have no respect for neighbourhood residents, their children or local businesses.

The BWXT/CNSC has nothing but contempt for local residents/interveners who insinuate themselves into this approval process. If you need to be reminded, make sure you attend a CNSC intervention personally. And remember, every cent you see is the taxpayers money; not theirs.

Intervention;

To the matter of the site extension approval.

The CNSC's produces one of its most sophomoric efforts in recent memory, attempting apply science and statistical probability to legitimize its rationale to approve this extension. All while failing to even consider the fact that the neighbourhood has undergone housing intensification during the past ten years and that more parents and children are now closer to this derelict building/site than ever before. There will also be many more populating the area over the next decade as Toronto grows.

CNSC scientists/nuclear apologists used and science-fiction-science to defy logic in order to attempt to justify a site extension for a secret nuclear fuel manufacturing facility, (with a 9,000 gallon hydrogen tank/ bomb on site), in downtown Toronto, in the year 2020

It is like trying to "put lipstick on a pig". No matter how the licensee, or the CNSC, try to portray the "safety" of this site to neighbours within the blast range, the BMXT site remains a pig and no lies, or lipstick, will change this truth; We should give the commission "creativity" marks for trying to make this NOT sound like a crazy idea; but it is a crazy idea.

Unreasonable risks to women, children and old people;

The extension of this site permit poses unacceptable risk;

- 1) To those neighbours sucking up depleted uranium (DU) gases on a daily basis;
- 2) To children at the schools nearby who experience #1 above and DU rain/snow showers in their school yards
- 3) To those citizens unfortunate enough to live in the blast zone when, without warning, there is an H2 emergency and catastrophic explosion. If such an emergency occurred when the H2 tank is being refuelled the blast range would be even larger
- 4) To people who buy property in the area who will not be provided with the information that this area (and the property they are purchasing) has been bombarded by DU from this plant site for decades exposing them to significant DU accumulation on their property and to people who tend to their backyard vegetable gardens
- 5) To people trying to sell their property in the future; if mandatory disclosure is required for "grow room houses", it can only be a matter of time that there is mandatory disclosure for proximity to the BMXT site and blast range
- 6) To the corporation of the City of Toronto which would experience unanticipated losses of residential tax revenues due to a large area becoming uninhabitable due to an H2 tank failure, and the large section of the city that would be exposed to the release of DU stored on site in filters, pails, derelict trailers on site etc

This intervention will outline the reasons why this facility is not appropriate for a residential community and we demand the CNSC respond to the following questions and observations.

1) Passing the Buck another 10 years ;

Somehow the site was sold to another US interest without much fanfare. The site still has the same rusted trailer visible. What is in it? and why was it not removed by the previous owners? and if not why not? What kind of transaction dumps the waste on the purchaser? Finally, where is the CNSC review for decommissioning of the site (assuming another 10 year term is not allowed? Where is the funds held to protect the taxpayers when the site has to be sealed for eternity?

2) What happens if there is a catastrophic event, followed by release of depleted uranium dust, resulting in property damages?

Do the sites neighbours within the blast zone understand that in the event a refuelling mistake causes the H2 tank to explode, that their homeowner (and auto policies) would exclude their losses resulting from “nuclear” events?

Are condominium corporations in the “blast zone” area aware that their commercial property policy contains a nuclear event exclusion?

What are the financial implications to Toronto in the event a catastrophic event followed by aerification of depleted uranium? Would people still be required to pay their mortgages on uninhabitable home as they do in Japan?

3) Plant and neighbourhood testing: CNSC is not an independent third party when testing local environment;

We want the CNSC to provide evidence that any testing is sufficiently random so as to prevent coordination with BWXT plant operations. What measures are taken by the CNSC to keep its testing schedule secret from BWXT?

The CNSC protocol for cases where test results show significant variances and/or which exceed the limits is unclear; for example, what would be the CNSC response if the daily level spiked to dangerous value but this amount (in annual totality) would still put BWXT within their annual maximum emissions limit?

4) A total absence of meaningful emergency response protocol for the BWXT site.

The BWXT/CNSC Emergency response protocol is not relevant in the case of an H2 tank/refueling failure therefore special considerations need to be made to give the community enough warning of a possible H2 blast; the only means of protecting local citizens from a catastrophic H2 blast (the non-nuclear part of such a disaster) would be to install an siren similar to an “air raid siren” warning people to immediately get shelter. However, according to CNSC requirements set out below, no such action is required if the event is deemed a “catastrophic incident”. Surely, with 9,000 gallons of liquid H2 on street level, any H2 related event should result in the immediate notification to the surrounding neighbourhood. However as set out

below, this is not CNSC/BWXT protocol. Not even for first responders? Again, the question is ; how is the CNSC making it safe for BWXT neighbours? What about first responders?

Below the following is contained in the CNSC's own Compliance report;

From the CNSC Compliance Report, in the "Compliance Matrix," this phrase appears on Pg. 22 of 31 (inside a recommendation that from what we can tell has not been met):

- While item 5b above requires licensees to notify the offsite authorities within 15 minutes of event categorization, ideally such notification should be done as soon as possible. It is critical that the CNSC and offsite authorities be advised within the identified timeframes. The only acceptable exception to the requirement would be when immediate action was required to prevent a **catastrophic incident** from occurring.

5) About protecting the H2 tank; where is the CNSC?;

Why has the CNSC failed to ensure adequate barriers are in place to prevent overrunning the tank platform? Was it GE Hitachi or BWXT who erected the pipe barriers around the unit. Surely the CNSC, who prides itself on "safety first" best practises, would have seen to it that the strength of the barriers around the H2tank are greater than those found at you average parking lot. However, on examination, these barriers are nothing more than those used to prevent illegal parking.

This is either because the CNSC does not have the expertise to evaluate risks associated with H2 storage-etc, or BWXT just "cheaped-out" and the CNSC stamped their approval?

Either way, this plant should cease operation until the H2tank protection exceeds those found at municipal parking garages.

Perhaps the CNSC can recommend the installation of the sufficient barriers to prevent overrunning of the tank platform, such as those of the gauge used at nuclear reactor sites rather than poles you can chain bicycles to.

Conclusion ;

In closing, we are of the view that the CNSC must, acting responsibly and in accordance with its own mandate, refuse the extension of this permit and demand that the site be closed and that site remediation will begin immediately .

In the meantime, BWXT must immediately take all steps to secure the facility and bring the security up to modern, post 9-11, levels.

We remain,
Yours sincerely,

Kyle Blaney
Brad Blaney