



**Written submission from
Helen Burnaby**

**Mémoire de
Helen Burnaby**

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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Helen Burnaby

Peterborough, Ontario

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
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Sent by email to: cncs.interventions.ccsn@canada.ca

Dear Sir or Madam:

re: BWXT License Application to CNSC

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1. Introduction

I am a concerned citizen writing to the CNSC in regards to BWXT's request for a 10 year license which may include their right to make pellets at their Peterborough site. This matter is scheduled for March 5-6 in Peterborough. I would like to make a written submission to the commission.

2. Interest and Expertise of the Intervenor

I have no expertise in the nuclear field. My interest and concern is for potential risks to the environmental and human health aspects of the proposed activities at the facility. There is a elementary school less than a block away from the site and this is a downtown residential area as well. The unknowns are what I am worried about. Least of which are what happens to house values in the neighborhood.

3. Background

Current license expires December 31, 2020. The facility is the former GE plant and now BWXT-Hitachi.

4. Scope of Review

This intervention considers CNSC's jurisdiction regarding the Nuclear Safety and Control Act. Ensuring adequate protection of the environment and human health.

5. Findings

After reviewing material of CNSC and BWXT, there are issues relating to environmental and human health concerns which BWXT can't address. If the 10 year license is granted, and they choose to make pellets, how can they predict and guarantee that the emissions from the stack and the copious amounts of water they need to make pellets, will not do harm to lands and people when they are dispersed?

6. Recommendations

1. According to CNSC's Environment Principles 2.1 in the Regulatory Document, is there any provision for where the nuclear facility is situated or the age of the facility?
2. Environment Risk Assessment 4.1 "Simple screening assessment as described in CSA N288.6 is adequate." But is it enough for a possible pelleting facility?
3. Environmental Principles 2.9.1 Assessments and Protection Measures. "The applicant or licensee shall present a characterization of the baseline environment (before any development of the facility or activity has started) for any portion of the environment where the site indicates potential for interaction." I assume this was done but how can BWXT predict the effects when they may or may not make pellets?
4. Specialized element of environmental measures 4.5. Have BWXT allowed for development of and increased groundwater monitoring program if pelleting is allowed?
5. Environment Management System 4.3. Monitoring of contaminants for potential effects in the environment. Perhaps monitoring more than a 5 year cycle. Conduct an annual management review.
6. Can/CSA 15014001 Environment Management Systems requirement. For nuclear substances, the Radiation Protection Act, regulators require exposure and doses to be managed according to ALARA. What about 2020 and beyond? If BWXT decides to make pellets, there is no projection of emissions available and the exposure levels are an unknown. The long term consequences are not worth the risk.

7. Order Requested

The recommendations above are common sense arguments in regards to human health and safety and environmental concerns of the BWXT facility. I know you will be receiving many more detailed submissions. In summary, I humbly request:

NO pelleting at the BWXT site in Peterborough

License renewed but not for 10 years. This reduces public involvement and potential for license reviews.

Stricter regulations for compliance and monitoring of air emissions and groundwater.

Yours truly,
Helen Burnaby