



**Oral Presentation**

**Exposé oral**

**Written submission from  
Kyoko Sato**

**Mémoire de  
Kyoko Sato**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**BWXT Nuclear Energy Canada Inc.,  
installations de Toronto et Peterborough**

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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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February 3, 2020

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Intervention re: Hearing Ref. 2020 - H - 01

In what follow, I am presenting specific questions and comments with regard to the contents of a written application submitted by BWXT NEC. In doing so, I seek clarifications of the grounds on which CNSC has made a recommendation to the commission to approve BWXT NEC's application for renewal, and to question the CNSC's decision to do so.

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"BWXT NEC continuously improved engagement with the communities in Toronto and Peterborough through timely, transparent and meaningful discussion in an effort to develop an atmosphere of openness and transparency with members of the public, elected officials and Indigenous groups." By this do they mean those Community BBQs? I am not convinced that the company has done anything other than such nominal gestures of outreach to be open and transparent about what it is actually doing in its facility. I've seen increased police presence around the facility at some point. It did not create an atmosphere of openness to be sure.

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"...sharing information concerning anticipated effects on the environment, and the health and safety of persons that may result from the activity." We never received such information. Where is it? How did they provide it? Who measured "anticipated effects" and concerns, and how?

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“Human Performance indicators, such as Near Misses or First Aids are tracked as a measure of performance improvement.”

What were such adverse outcomes and experiences been recorded at the BWXT NEC Lansdowne site? What risks and incidents have been experienced and predicted at this site? And how had they been managed? What are the turn-over rates of employees?

Reported cases of problems had apparently been “resolved” each time, but the application does not state exactly how they had been resolved.

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“Internal radiation hazards exist at both the Toronto and Peterborough facilities in the form of loose Uranium which may enter the body by inhalation, ingestion or absorption.” Is loose uranium released outside the facility, potentially exposing the residents and pedestrians to uranium power, which is a radioactive material? If so, who monitors it and how it is done?

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*Action Levels for the Radiation Protection Program* at Toronto Facility are set much higher than for its Peterborough counterpart. Why?

According to the application, BWXT NEC routinely measures workers’ possible radiation exposure levels. The levels seem very high, but presumably they have protective gears on them. But us, the members of the public do not walk around in protective gears. We did not sign up for living in such a close proximity to the uranium processing plant. We do not have shields installed in our house. We do not have specialized filtering system to ensure that we are not inhaling uranium dust.

How come nobody in the past 10 years of our living here had come to knock on the door, asking to measure radiation levels of the air, water, and soil of our home as well as on our skin? Has it never been a public health concern? Whose responsibility is it?

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The application shows the “estimated” radiation doses to the member of the public, but it is estimation. What are the actual measurements in water, air, and on skin of the public in the area? Where exactly is the boundary of BWXT NEC?

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The upper limit of 1000  $\mu\text{Sv}/\text{year}$  is indeed a higher level than the normal level of absorbed radiation in the area of Fukushima Daiichi before its nuclear meltdown. It seems rather lenient to me, and I am glad that the estimated level is nowhere near the upper limit. But I would like to have the actual *hourly* measured level of radiation in the surrounding areas of BWXT NEC facilities, reported to the public until the hearing in March.

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BWXT NEC purportedly never exceeded the action level of emission of uranium in the environment in the last license period, but if it ever did exceed and it made a report to CNSC, then what would CNSC do to ensure residents' safety? Once emitted, it would be extremely difficult to contain uranium dust.

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According to BWXT NEC's record, uranium in boundary air sampling shot up in 2016. What happened?

I find that the City Government is irresponsible for authorizing developers to further develop the Dupont corridor without informing prospective residents or taking any action to intervene in the continued operation of BWXT NEC. The effects of radiation are not only the concerns of those who reside in close proximity to BWXT NEC, but should also be of the entire GTA as uranium dust travels widely. We have witnessed the global-reach of nuclear meltdown of Fukushima Daiichi. It should be in the best interests of both the city of Toronto and developers to remove BWXT NEC from downtown Toronto.

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What were "the exercise scenarios" used in training? In other words, do they include all potential scenarios that are specific to each site?

Should all residents not be informed of what kinds of scenarios they should be prepared for, and how?

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"There have been four reportable events related to transportation over the current licence period. Two were related to classification, one related to damaged packaging and the fourth

was a minor motor vehicle accident.” As a result of damaged packaging, what happened? Where did a motor vehicle accident occur? Please consider the non-viability of having uranium dioxide being transported through the city of Toronto where motor accidents are frequent.

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I have not been a beneficiary of BWXT NEC’s “Public Information Program.” For instance, I have not received a single copy of a community newsletter that the application mentions in the past 10 years of my residence in the neighborhood. The application includes the following: “Maintaining information pamphlets with current information about the facilities of interest to a member of the public[.]” But I have never received any such pamphlets.

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I have no knowledge of the following events taking place:

- Holding or participating in public/community meetings and open houses; and
- Mailings to stakeholders to communicate public information and solicit comments and questions

Please tell me the dates, times, and locations that the above events had taken place, and how exactly BWXT NEC had communicated to us that such events were to take place.

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If BWXT NEC had consulted with and informed the elected officials such as MP for Davenport, MPP for Davenport, Councilor for Davenport, Toronto Public Health, Ministry of the Environment, and Ontario Minister of Agriculture, Food and Rural Affairs regarding its operation in Toronto as it alleges, I would like to know if any one of those who were contacted raised concerns about BWXT NEC’s continued presence at Lansdowne and Dupont. If nobody raised concerns, then it seems to me that they failed to represent the voices of those whom they are supposed to represent. We are left until the last minute to intervene within the system that is failing us.

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With regard to BWXT NEC’s community engagement, did it only communicate with those who were on their contact list? When and how was the list made? How many residents are on the list? The list-making opportunities were not advertised. The list was made largely without our knowing it, and therefore the list allowed the company to reach out only to a selected few.

And the banner that alerted us to the upcoming, *final*, hearing meetings appeared on one side of BWXT NEC Toronto's premise only in the last month. I received way more information from those who are active in the community.

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"In addition to providing volunteer hours, BWXT NEC supports a range of community-based groups/initiatives that help improve community life in three key areas through charitable giving: community and cultural, charitable and health care support, education and vocational support. Examples include bursaries and scholarships to local high school, college and university graduates and support for community events."

I am curious to know if BWXT NEC has engaged in the above listed activities in its name? Is there a list of recipients? If so, I would like to see it.

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"For example, in 2016, both Peterborough and Toronto had approximately 130 community members attend. By 2019, this number doubled with over 300 community members in attendance." Are the numbers for both sites combined together? If so, how many in Toronto site?

General

As the application states, the facility has been in operation since the 1950s, the same vintage as the TTC, which is constantly having signal and other problems. Is it not the case that the hard structure of its facility is outdated? I am concerned that such a high-risk operation as uranium pelleting is carried out in the aged structure.

Finally, I would like to state that I am very alarmed by the fact that we are "allowed to intervene" only after CNSC had already recommended BWXT NEC's license renewal to the commission. The renewal application process has been progressing for a long time before we were informed of it. If some of the concerned and active members of our community did not alert us to the fact that BWXT NEC was applying for a 10-year license, I would not have known in time to make an intervention. As it is, we were given hardly any time to make meaningful intervention into a decision that would directly impact on our lives. I have a 10 year-old child who grew up in the house a block away from BWXT NEC. I've lived with the continuous nuclear threat on his health for the past 10 years and yet, I've given a very small window of opportunity to say no to the continued operation of BWXT NEC. I am asking the

commission to do the right thing and not to renew BWXT NEC's license. I urge you to recall that Fukushima Daiichi operated without major incidents—just accidents which were presumably “resolved”—since 1971, and that one major “incident” in 2011 displaced thousands of people, leaving the entire towns in ruins.

Thank you for your time.