



**Written submission from  
Kathy Dunne**

**Mémoire de  
Kathy Dunne**

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**

*This page was intentionally  
left blank*

*Cette page a été intentionnellement  
laissée en blanc*

Submitted: January 25, 2020

**Re: BWXT Nuclear Energy Canada Inc. Licence Renewal (Hearing Ref. 2020 - H - 01)**

Dear Ms. Velshi and Committee Members,

I wish to submit a written intervention to the CNSC for the BWXT Nuclear Energy Canada Inc. (formerly known as GE-Hitachi Nuclear Energy Canada Inc. and which I will subsequently refer to as BWXT) application for licence to allow uranium pelleting in Peterborough, Ontario.

I would like to outline my concerns and the reasons for my concerns.

**BWXT has provided mis-information and concerning information to the CNSC in their written submission to the Commission dated December 12, 2019.**

“...In addition, there have been no lost-time injuries at BWXT NEC over the past five years...”

The existing licence has been in effect in Peterborough since 2011. Why are BWXT not providing the CNSC with safety statistics on the full 9 years? Why are they only reporting on the last 5 years? Is it because there were safety concerns within the 9 year time frame? Perhaps they don't like to mention the flood of the building floor that saw contaminated water from the plant flow through our community and spill into Little Lake? Or the fact that several years ago they discovered that their employees were using masks that were not providing them with adequate protection. Mistakes happen. I will refer again to mistakes on page 5 of this submission.

I also wonder why a company who professes to be separate from GE Hitachi is being considered for a 10 year licence when they have only been in operation here since 2016? Or are they the same company after all?

Which would be great, since a lot of people have a lot of questions for GE, and they deserve answers, as well as compensation for the harm!

“In November 2018, BWXT NEC submitted an application seeking a 10-year renewal of its Fuel Facility Operating Licence based on the current possession and processing limits of Uranium as follows:

- Possess up to a maximum of 700 Mg of Uranium at the Toronto facility in any form at any given time;
- Possess up to a maximum of 1500 Mg of Uranium at the Peterborough facility in any form at any given time; and
- Shall not process more than 150 Mg of Uranium at each facility in any form in any calendar month.”

Why does BWXT’s licence require the Peterborough facility to possess more than double the amount of “Uranium in any form” than at the Toronto facility? This is concerning on many levels.

“Throughout the licence period, BWXT NEC continuously improved and updated the PIP in response to increased levels of interest from the community. Updates to the PIP over the course of the licence period included additions of a community newsletter, increased public advertisement, establishment of a Community Liaison Committee (CLC), requests to meet with local elected officials, Indigenous communities and local organizations, addition of a dedicated communications team, participation in community events, and increased opportunities for communication.”

**AND**

“In November 2018, BWXT NEC submitted an application seeking a 10-year renewal of the licence.”

I am a well read and informed individual and have never seen any community outreach from this organization in Peterborough. In fact, this licence application was submitted to the CNSC one full year before I heard about it, and I did not find out about it until I read a news article in the local newspaper in November 2019. Is this an acceptable level of “Public Information Program”?

“In addition, contaminated equipment from off-site nuclear facilities is periodically received at the Peterborough facility for repair and/or modification.”

**This community does NOT know about this! What else do we not know about?**

“Any pellet production at the Peterborough facility would be conducted within the existing licensed facility via a re-configuration of existing space. Air and water emissions are routinely measured at both the Toronto and Peterborough facilities and historically are shown to be only a fraction of the regulatory limits. A bounding ERA for the Peterborough facility has been submitted in conjunction with the licence application demonstrating that the anticipated environmental emissions and monitoring practices at the Peterborough facility would be similar to those currently in place at the Toronto facility.

**If BWXT is bring pelleting operations to Peterborough, should the environmental emissions and monitory practices be EQUAL TO or BETTER THAN those in place in Toronto? Similar doesn't quite seem good enough. Peterborough's drinking water is drawn from the Otonabee River, and we do not have the benefit of contaminants being diluted in a huge Great Lake as Lake Ontario.**

“October 16, 2019. BWXT NEC is seeking approval of the updated financial guarantee amounts as follows;

Peterborough: \$10,775,122

Toronto: \$37,362,745

BWXT NEC has requested that the financial guarantee instrument be a combination of Surety Bond and Letter of Credit, with the first \$700,000 for Peterborough and first \$1,300,000 for Toronto being satisfied by Letters of Credit. The remaining obligation in each case would then be satisfied by Surety Bonds. Draft forms of both instrument types and details of the underwriting financial institution have been provided to CNSC Staff on October 16, 2019.

**Why is the surety amount lower for Peterborough than Toronto? This plant already sits on land that was contaminated by GE, and rather than compensate families of deceased and diseased employees and clean up the mess they made, GE-Hitachi ceased operations here and was replaced by BWXT. What assurances do we have that the same thing won't happen again? We need a substantial cash guarantee to ensure that funding is available to remediate this neighbourhood.**

## **Accidents happen, and humans make mistakes**

How many of us were awakened at 7:30 am recently by an Amber alert that turned out to be a Nuclear Facility Alert at the Pickering Nuclear plant, telling us not to panic. How many Ontarians did not panic? Accidents occur, whether sending the recent alert was a mistake in itself, or the result of a mistake at the plant, these situations should be cause for concern.

Previous mistakes at the GE/BWXT facility are noted on page 5 of this submission.

Natural uranium is extremely dangerous when it enters your body by being inhaled, ingested or through a cut or sore. Uranium dust that is inhaled or ingested can release massive amounts of radiation. There is **no safe dose of radiation**. The allowable levels of pollution permitted by CNSC standards are ridiculously high and should be reviewed and reassessed. Consider the safety measures put in place by GE for their workers, and consider how many of these people are no longer with us today, or are extremely ill.

BWXT is currently the plaintiff in a lawsuit in Portsmouth, Ohio. The lawsuit contends that "...BWXT could not have prevented every risk of harm to humans..." and that "they, through their silence and "aggressive public relations efforts," misrepresented that their uranium enrichment operations did not contaminate the surrounding community. BWXT, among others, have allegedly "attempted to mislead and misrepresent the nature of the materials being expelled" into Pike County. As a result of the defendants' actions, the plaintiffs claim, Pike County residents have been exposed to radiation that can cause "gravely serious" biological effects.

Workers at the BWXT plant may be wearing protection now, and they get to go home after work to clean environments. Those who live nearby are not as lucky. These types of facilities do not belong in our communities. These operations need to be undertaken at a substantial distance from human exposure. Why are BWXT not seeking a licence to take this operation to Arnprior, Ontario, where the BWXT facility is sited on industrial lands with very few homes in the immediate vicinity. Take a look on a google satellite map to see what I am referring to. The population density surrounding the plant in Arnprior does not compare to Peterborough. I am intrigued by the strategic angle of the aerial photo of the Peterborough

facility shown in their Dec 12, 2019 submission to the CNSC, when in fact the plant is surrounded by homes and is within 20 meters of an elementary school. BWXT sends their nuclear bundles to GE Nuclear in Wilmington, North Carolina. Another interesting site to view from google satellite maps. No houses anywhere.

If this commission is a commission of the Government of Canada, shouldn't your primary focus be on protecting the public? Currently our outcry against this licence is localized, but it could easily spread.

It is my sincere hope that the concerns of the citizens of our community are taken into consideration and that this process of hearings and interventions is not merely for the benefit of appearances to push through a decision that is a fait accompli. While I appreciate the extensive list of education and work experience of the CNSC committee members, I do have concerns about the composition of the Commission and would like to see a call for members to represent the communities most at risk from the decisions you implement.

In closing, I would ask you, how many of you would be willing to relocate your families to Peterborough tomorrow? I know of some cheap land, city centre and close proximity to shops, restaurants, schools and playgrounds.

Kathy Dunne