



**Written submission from  
Devon Code**

**Mémoire de  
Devon Code**

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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laissée en blanc*

Wednesday, 15 January 2020

Senior Tribunal Officer, Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

*Sent by email [cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)*

**RE:** Intervention by Devon Code for the BWXT Licence Renewal (Hearing Ref. 2020 - H - 01)

To whom it may concern:

I wish to submit a written intervention to the CNSC for the BWXT application for licence renewal in Peterborough, Ontario.

I am a parent of a child who attends Prince of Wales school, which is located within about 20 metres of the BWXT facility. I also live within two kilometres of the BWXT facility. I have many concerns regarding the renewal of the licence, including:

- A lack of transparency on the part of BWXT given why the licence request includes the possibility of pelleting operations in Peterborough if they have no immediate plans to move the existing pelleting operation from Toronto to Peterborough.
- The impact of a nuclear processing facility on the mental health and well-being of the children who attend Prince of Wales School and live in the surrounding area.

Locating a nuclear processing facility of the kind that operates on Monaghan Road in Peterborough so close to an elementary school does not reflect the ALARA (As Low As Reasonably Achievable) principle under which the CNSC operates. I have further concerns that the CNSC review of licence requests does not take into consideration the socio-economic impacts of nuclear facilities on surrounding communities. A catch-all licence that applies to both the Toronto and Peterborough BWXT locations does not take into sufficient account the individual concerns and circumstances of these two very different communities.

I would like to ask the following questions regarding the licence application:

- Why doesn't the application take into consideration the socio-economic impacts of the facility's operation on the surrounding community?
- How does new the financial guarantee in the licence of \$48.1 million relate to what the financial guarantee was previously? Has it changed? Why or why not?
- Do you have information about the Peterborough operation's site history that should be considered, such as the condition of the existing infrastructure, the safety record and environmental impacts of the previous industrial operations at the site?
- Will the licence prohibit non-CANDU uses of materials processed at the site?

- What is the decommissioning protocol for the Peterborough site? What plans are in place for the eventual necessity of this sensitive and potentially environmentally hazardous procedure?

I would like to make the following recommendations:

- That the licence not be granted in light of the potential impacts on the mental health and well-being of the children who attend Prince of Wales School, which would be in keeping with the ALARA principle under which CNSCS operates.
- Should the licence be granted, that it be limited to a one-year period.
- Should the licence be granted, that it exclude permission for BWXT to produce uranium pellets at the Peterborough site.

Thank you for considering my intervention.

Sincerely,

Devon Code  
Peterborough, ON