



Oral Presentation

Exposé oral

**Written submission from
Corinne Mintz**

**Mémoire de
Corinne Mintz**

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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I am a resident of Peterborough, a business owner, and a parent. When I found out approximately one year ago that BWXT- NEC was applying for a license renewal, and planning to change its operations here in Peterborough to include uranium dioxide pelleting, I was very concerned.

Now after researching the process of making uranium pellets and the possible health, environmental, economic and social repercussions I am even more concerned.

It is my understanding that making uranium dioxide pellets involves creating much more uranium dust than is currently being produced at BWXT's Peterborough facility with their current process of bundling already formed pellets. This dust is extremely harmful to human health and just one particle of natural uranium dust, once inside the body, damages human tissue and has the potential to cause cancer. The National Academy of Sciences states that: "the scientific consensus is there is no safe dose of radiation". Dr. Kathy Vakil states "that all process in all industries have emissions". In BWXT Peterborough's case these emissions could potentially be uranium dioxide power in our air, water and on our land.

There are so many important points that need to be raised at this hearing before any type of well thought out, and informed decision can be considered. Below you will find a few of those points:

Combined licenses for Peterborough and Toronto

I am concerned about BWXT's licensing process. How did it come about that there is one license representing Peterborough and Toronto? I have read that it is more convenient and cost effective for BWXT to submit its license renewal in this combined form. I feel strongly that Toronto and Peterborough are different cities with different facilities creating different products. We are also different communities of people with unique circumstances and considerations.

****My question for the CNSC is how can the Toronto and Peterborough licenses be restored to their previous status of having separate licenses for communities doing separate processes?***

Unique features of the Peterborough facility – proximity to Prince of Wales school and legacy contamination from GE-Hitachi

One of the unique features of the Peterborough facility that must be kept in mind with any decisions made regarding introducing a pelleting facility to our community is the current location of BWXT. BWXT-NEC is located in a residential neighbourhood meters away from Prince of Wales primary school and just blocks away from a second public school Queen Mary.

Children are much more susceptible to the harmful effects of radiation. Looking at BWXT's testing results from Toronto's existing pelleting facility, if pelleting were to begin here in Peterborough there will be more uranium dust released into the air (*comparing tables 36 and 37- pages 54 and 56 - BWXT annual compliance monitoring report*).

****My question for the commission is how can this possibility even be considered when children are playing, eating the snow and inhaling the air just across the street from BWXT-NEC?***

The second unique situation occurring in Peterborough is that BWXT is located on the old GE-Hitachi site. This site is known to be toxic and contaminated from decades of irresponsible use and insufficient regard to health, safety and the environment. Citizens living surrounding the old GE- Hitachi facility have for years been being exposed to many toxins.

Recently, I was in conversation with a City Council representative and they related to me, that it is well known that the underground chemical contamination from GE- Hitachi reaches from the existing facility all the way to Romaine St., 4 blocks south of the facility. Dr. Kathy Vakil from Physicians for Global Survival states, "DNA damage, toxic exposure, and carcinogens are cumulative over a life time. Any one DNA damage to one cell may not trigger a cancer in you, but the second might, or the third one might. So it is in everyone's interest to reduce your carcinogen burden, your toxic burden as much as you possibly can".

Adding uranium dust to the air and water in a community and city where there is already a heavy toxic burden is reckless and unwise and in disregard of human health and safety.

****My question for the CNSC and BWXT is: Rather than granting the possibility for BWXT to move a pelleting facility from a residential neighbourhood in Toronto to a residential neighbourhood in Peterborough with a high toxic load already, wouldn't it be a much wiser, more cautious and considerate decision to move the existing pelleting facility to a location far away from people and/or in a location with a buffer zone around it?***

Past cases where the public has not been adequately protected

The public has been assured that nuclear companies like BWXT and its Canadian regulator the CNSC make sure that everything is perfectly safe for the public. When individuals or groups raise concerns they are told that their fears are unscientific and unfounded.

I wish that were the case.

Unfortunately we have example after example world wide that the nuclear industry is not safe and that the public and the environment are not safe from the harmful effects of this industry. Uranium mining, the production of fuel pellets and fuel rods and the resulting radioactive waste that is produced by the nuclear industry all pose significant risk to human health.

Examples like Chernobyl, Fukushima, and the contamination of Port Hope and Elliot Lake (just to name a few), show that regulators cannot keep the public safe from the

harmful effects of the nuclear industry.

Port Hope has experienced accidents, spills, leaks, and houses and properties that are contaminated with radioactive materials. It is wise to check a house in Port Hope with a Geiger counter before purchasing it. I have had the opportunity to speak with residents of Port Hope, and the stories they relate regarding exposure of themselves and their families to radiation and the subsequent health issues they have had to endure are truly horrific.

At this moment a 1.28 billion dollar effort is going into cleaning up radioactive contamination in Port Hope. This is taxpayer's money!

It has recently come to my attention that Pike County Residents in Ohio USA have filed a class action that I believe involves BWXT. This class action is concerning radiation contamination in Zahn's Corner Middle School in Piketon. How unlikely is it for Prince of Wales to suffer the same fate? It doesn't seem from this article that BWXT was capable of keeping that community safe. I am not assured that the fate of Peterborough will be any different.

****My question for the CNSC and BWXT is how can you possibly expect Peterborough to accept your assurances that making pellets is completely safe and that the CNSC limits of contamination are protecting the public when nuclear companies and the CNSC have rarely if ever been successful in containing their harmful emissions before?***

****If pelleting is allowed to commence in Peterborough what is stopping Peterborough from sharing the legacy of contamination and stigma that Port Hope has to endure?***

And Lastly, but most importantly, Citizens Against Radioactive Neighbourhoods has circulated a petition expressing our concerns about the possibility of a pelleting facility being located in our city. You will find the wording of the petition below:

Sign The Petition! Say No to Uranium Pelleting Peterborough!
Good Neighbours Don't Make Radioactive Pellets!

To: The Canadian Nuclear Safety Commission;

BWXT has announced it is seeking a ten-year renewal to their existing licence but have requested a change -a change that would allow them to process uranium dioxide powder into pellets in Peterborough for the first time.

Specifically, they are asking Canada's nuclear safety regulator, the Canadian Nuclear Safety Commission, (CNSC), to grant them a licence change which would allow them to conduct uranium pelleting operations at its Peterborough facility, in addition to fuel bundle assembly and the repair of contaminated equipment under the terms of its current license.

IN CONSIDERATION OF THE FOLLOWING FACTS;

1. For the very first time, BWXT-Peterborough would be able to process large amounts of very fine uranium powder that can be easily inhaled, ingested, or absorbed into the body through a cut or abrasion.

2. Significantly increased amounts of uranium dust would be released from the plant in the form of fugitive airborne dust emissions as well as liquid effluent.
3. Children are especially vulnerable. Uranium is a very long-lived radioactive heavy metal that poses both a chemical hazard and a radiological hazard when inhaled, ingested or absorbed. The BWXT plant in Peterborough is just metres from the junior playground of a public school.
4. The city of Peterborough is already exposed to legacy waste associated with industrial activity on this site.
5. No federal environmental assessment applies to this project and therefore no consideration of the need or purpose of the proposed activity, alternative means or socio- economic and sustainability factors will be reviewed by the CNSC.

THEREFORE, WE AS THE UNDERSIGNED CITIZENS CONCERNED ABOUT THE IMPACTS OF THE PROPOSED CHANGE ON OUR HEALTH, COMMUNITY AND ENVIRONMENT, REQUEST THAT THE CNSC DENY BWXT'S LICENCE REQUEST TO PRODUCE URANIUM DIOXIDE FUEL PELLETS IN PETERBOROUGH AS PART OF ITS 10-YEAR LICENSE RENEWAL.

We requested that people write their name, city and province of residence, signature and if desired, their e-mail address.

At the date of the writing of this intervention there were 899 signatures on our digital version of this petition and approximately 480 signatures on our paper version of the same petition.

This represents a significant portion of Peterborough's 81,000 citizens who have taken the time to sign their names and express that they do not want BWXT to have the flexibility to start pelleting here in Peterborough.

It is also very important to mention that there have been weekly demonstrations held outside of both BWXT and City Hall. These demonstrations began with just a handful of people and have grown each week. On Jan.18th CARN's demonstration had 81 attendees in a horrible snowstorm. I am sure the numbers attending and expressing their concerns will continue to grow. I will show a few slides of these demonstrations at the hearing.

Thank you, I hope my concerns are given serious consideration by BWXT and the CNSC.

Corinne Mintz

On the following page you will find links to articles and documents to support some of the information contained in this intervention.

General Electric and their legacy of contamination in Peterborough

https://www.unifor.org/sites/default/files/documents/document/ge_advisory_cmtt_report_may_15_final_for_web.pdf

https://www.mykawartha.com/news-story/7531084-future-uses-of-general-electric-site-may-be-limited-due-to-chemical-contamination/?fbclid=iwar3thz5nkcdzdfuxn-7bimhrdy_8shqg0tm8uzrot8z_e1jcpupdzvpuxu

Port Hope's history with radioactive contamination and clean up effort:

<http://www.waterkeeper.ca/blog/2016/11/8/what-you-need-to-know-about-the-port-hope-area-radioactive-waste-cleanup>

<https://www.globalresearch.ca/alpha-particle-uranium-contamination-in-port-hope-ontario/8332>

Class action regarding BWXT in the United States concerning radioactive contamination of a school:

<https://www.classaction.org/news/another-class-action-filed-over-alleged-radioactive-contamination-near-ohios-portsmouth-gaseous-diffusion-plant>

<https://www.classaction.org/news/pike-county-ohio-residents-file-class-action-over-alleged-radioactive-contamination-of-properties>