



**Written submission from
Birthe Jorgensen**

**Mémoire de
Birthe Jorgensen**

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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From: Birthe Jorgensen
Sent: January 26, 2020 3:56 PM
To: Interventions (CNSC/CCSN)
Subject: Intervention on the application for a license renewal by BWXT

January 26, 2020

I am submitting this intervention to voice my and my family's objection to the renewal application being made by BWXT to continue its nuclear components processing at 1025 Landsdowne in the heart and core of Toronto for a further 10 years.

I have lived in this area of Toronto since 1972, along the crest of Davenport hill, and raised my family here, first at 20 Lauder, then on Tyrrel Avenue, and most recently at Christie and Davenport.

I was therefore very shocked to learn that the BWXT facility, which I had always believed was an air conditioning plant, is instead a nuclear components processing facility. I became aware of the application for renewal of the license in information from the Ontario Clean Air Alliance and I am both grateful for having this brought to my attention and horrified that permitting the continuation of such a dangerous facility in this city at this time is even under consideration.

The current license allows 9000 Kg of uranium to be released into the water and 760 grams to be released into the air every year. But who can attest to this being a safe level? If not, the cautionary principle must be applied to this application. As a local resident, I did not nor would I consent to these discharges.

Apart from my concerns about the ongoing discharge of nuclear matter into the surrounding air and water in a very dense neighbourhood in the city, and blowing towards me, I abhor the notion that dangerous materials are being delivered to and transported from the plant through Toronto's infamous road congestion and antiquated rail network. Additionally, I have learned that large quantities of hydrogen gas are being kept onsite for processing purposes. This gas is highly explosive and an explosion there would decimate and crater this city. It should be unthinkable to allow this hazard to exist and continue.

Since 1972, I have never been approached about or received any information on the potential need for emergency evacuation, or indeed, what a possible emergency evacuation plan would look like were the worst to happen at the plant. Perhaps the members of the commission believe that an explosion or discharge would have such dire and immediately deadly consequences that any plan would be laughably inadequate, and therefore is unnecessary? However, while this may be true, not having an evacuation plan shared with local residents has only served the interests of GE and BWXT by failing to draw attention to the very existence of the plant. Why does the CNSC not require an evacuation plan to be publicly shared? This is a failure of your mandate and a disservice to your fellow Canadians and is disgraceful. One can't help but ask, is there collusion between the commission and the company when the commission is failing to protect the public interest?

As I have read about this license renewal, I have discovered that objections have long been made to the continuation of this plant's operations in central Toronto. Federal and provincial elected officials raised objections in 2013, when alerted by the Lake Ontario Waterkeepers, and after a 10 year license was granted. I hope that the current MP for Davenport, Julie Dzerowicz, will express objections to this license renewal on behalf of her Toronto constituents. Sadly, past objections were to no avail for some inexplicable

reason. Denial of the license renewal now in 2020 provides the commission with the opportunity to correct historic failure by the commission to protect the residents of Toronto and to contribute to Toronto's safety.

I trust that you have visited the site as you make your determination? The area surrounding this site is now surrounded to the east and north by new housing. A complex has been approved immediately across the road to the west for 1035 new housing units. Given the proximity of the hydrogen tank and the facility to the railroad tracks at its immediate south, this represents thousands of lives which will be endangered by the continuation of this operation. One railcar derailment will endanger all of these lives within seconds upon contact with the facility and the hydrogen tank. Given the aging of the rail infrastructure through the heart of Toronto, this is now a foreseeable event for which survivors would and should unquestionably hold the Nuclear Safety Commission accountable were it to occur.

I can't help but wonder why BXWT wishes to conduct this operation in the centre of Canada's largest city. If their objective is to save money by continuing to operate in the core of the city while endangering thousands if not a million lives, I cannot fathom why the Nuclear Safety Commission, which is to protect our public interest, continues to support this contrary interest.

This email serves as my submission. I do not wish to make a further oral presentation.

I would appreciate an opportunity to review BWXT's application prior to the hearing in March, which I intend to attend. Please forward a copy of the submission to the address below or send a link to the application to my email.

At the hearing, I hope to learn the reasons for your decision on the application, whether to deny it or grant it, in a timely fashion. I hope that through my attendance I will learn if and how you are fulfilling your role in regulating the use of uranium in the nuclear industry in Canada and protecting Canadians.

Trusting you will come to conclusions in the best interests of the Canadian public,

Birthe Jorgensen, Phd (Cantab)

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Toronto, Ontario

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