



Oral Presentation

Exposé oral

**Written submission from
Lara Griffin**

**Mémoire de
Lara Griffin**

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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laissée en blanc*

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

Sent by email cncs.interventions.ccsn@canada.ca

January 26, 2020

Dear Sir or Madam:

RE: BWXT Nuclear Energy Canada's application to license FFOL-3620.1/2020

I am writing this intervention regarding the license application of BWXT in Peterborough in which BWXT is seeking "the flexibility to conduct pellet production." I wish to intervene by way of written submission only.

I request that the Canadian Nuclear Safety Commission deny granting a 10 year licence for the Peterborough facility AND deny BWXT's licence request to allow pelleting in Peterborough.

Due to the location of the BWXT site, which is 30 metres from an elementary school and many homes, the proposed activity poses significant risks to the health and safety of Peterborough citizens. Storing Hydrogen and uranium dioxide powder in a residential neighbourhood is unreasonably dangerous. The proposed activity is incompatible for this location. There is no buffer zone if something were to go wrong.

Concerns regarding emergencies:

We have had a major problem with flooding in the City of Peterborough in recent years, and may experience more frequent and more intense flood events in the future due to climate change. As rainwater leaves the BWXT site, both overland and through underground drains, heavy metals and other contaminants will leave the BWXT site in that rainwater and flow into Little Lake where our children swim at Beavermead Beach. We have had high-wind events in recent years that caused damage to buildings and power lines. We have also had ice storms and summer heat waves that caused power failures. These extreme weather events are likely to significantly increase the amount of uranium powder that leaves the BWXT site (beyond the monitored emissions), through the air and water.

Similarly, what if there is an accident or fire at the site and the fire department is called to respond? What health risks are our city's emergency service providers being asked to accept? How will the City of Peterborough be prepared to respond to a radioactive contamination event?

Accidents happen, and humans make mistakes. Given the proximity of the site to schools, playgrounds, and homes, there is significant risk of serious harm to human

health. What is BWXT's plan to ensure the safety of neighbouring residents from accidents and what security measures will it take to ensure that the site is not intentionally targeted? I've learned that BWXT has had accidents at fuel pelleting plants in Canada and the United States. The risks to the community are not limited to accidents at the factory itself. Consider the safety and security measures required to transport these substances to and from the site, through more of our streets and neighbourhoods.

Lower property values and reduced economic investment for the City of Peterborough:

This proposal carries significant risk of damage to property values in the immediate area and to the city as a whole. House insurance doesn't cover nuclear damage and radioactive sewer backups. How much compensation would BWXT offer to Peterborough residents to remediate their homes? Is remediation even possible? What type of liability insurance does BWXT carry?

Consider the implications of increasing the uranium actual particle emissions to average 134 billion per day airborne, and 20 trillion per day waterborne. People would think twice about moving to a city that has radioactive heavy metal pollution, where monitoring equipment is needed to measure the radioactivity of our gardens. The city may experience falling house prices and a reduction in business investments.

Risks to clean drinking water for downstream communities:

Storing and handling uranium powder at BWXT poses risks to our watershed. In 2018, 94,000 times more uranium went into sewers from the Toronto facility than from the Peterborough BWXT facility (which does not currently have uranium powder on site). This indicates that a significantly larger amount of uranium enters the watershed through the act of pelleting. Have downstream communities been consulted by BWXT about this proposal? They stand to be impacted by contaminated drinking water.

Inadequate community consultation:

The exclusion of downstream communities from consultation raises the issue of the adequacy of BWXT's community consultation as a whole. Distributing invitations to a BBQ does not give citizens any indication of the underlying reason for the invitation. I've received invitations to BBQs at car dealerships and furniture stores, and felt that if I did not have time to attend, I probably wasn't missing out on a key opportunity to learn about a proposal to bring large hydrogen tanks and radioactive uranium powder into my neighbourhood. Low attendance at a BBQ does not indicate that the community is not interested. BWXT has not been forthright about their plans. A condition of BWXT's license is to communicate to stakeholders in the area around the plant. BWXT has failed to do this effectively.

In closing, this site would not qualify for the zoning required for the proposed activity, if considered at this point in time. The community has grown up around the former GE factory. There is no buffer zone at all. Operations may be guided by safety protocols and requirements for handling the hazardous materials, but accidents happen. Mistakes

happen. If they do, the consequences will be severe for many people in this neighbourhood and for the city as a whole.

I ask that you deny the request for pelleting in the license application. I also ask that you grant a shorter license renewal timeframe of five years to allow for a more accessible consultation process to take place, that is informed by independent studies of the emission levels of this activity, adequate buffer distances, and the impact of these emissions on human health.

Sincerely,

Lara Griffin

Contact information on the next page, as per guidelines. I do not want them published on the CNSC website. Thank you.