



## **Objections to the Request for Confidentiality**

## **Objections à la Demande de confidentialité**

In the Matter of

À l'égard de

BWXT Nuclear Energy Canada Inc.

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BWXT Nuclear Energy Canada Inc.

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Revision of Financial Guarantee for BWXT Nuclear Energy Canada Inc.

Révision à la garantie financière de BWXT Nuclear Energy Canada Inc.

Public Hearing - Hearing in writing based on written submissions

Audience publique - Audience fondée sur des mémoires

**January 2024**

**Janvier 2024**

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**From:** Betty McNeely  
**Sent:** January 6, 2024 5:26 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough has applied to change its operations and is asking to be granted confidentiality in this process.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To whom it may concern at the commission registry,

BWXT (a nuclear facility in downtown Peterborough, 25 m from a public school) has applied to change its operations and is *asking to be granted confidentiality in this process*. Despite the Canadian Nuclear Safety Commission (CNSC) mandated improvements and promises of transparency and good corporate citizenship, this request for confidentiality was posted *after* the deadline for community feedback; that deadline has been extended to Jan. 10th.

BWXT is applying to decommission its facility. What this means is unclear, and if this corporation is granted confidentiality, we won't ever know what it means. What does decommissioning mean for

- Property values in Peterborough?
- Children attending school across the street?
- The heavily contaminated land and buildings immediately adjacent to the facility?

The implications are not clear and must be a matter of transparency and public consultation.

Confidentiality? What is there to hide?

I am concerned, about BWXT's unknown new plans and their desire to keep them confidential.

I don't believe BWXT should be granted confidentiality as it submits it's decommissioning request.

Betty McNeely

**From:** [Scott Donovan](#)

**Sent:** Saturday, January 6, 2024 9:55 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201132} BWXT request for confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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To the CNSC Registry.

I understand through correspondence within my community group in Peterborough Ontario that the BWXT nuclear pelleting plant in my neighbourhood (Monaghan Road) has made an application to the CNSC for a confidential hearing. If this is the case, I'm concerned. In the past, especially at the last CNSC hearing regarding expanded scope for the facility, the hearings were open and transparent and I was able to process all of my concerns.

No doubt BWXT were within their entitlements to make a request to have a confidential hearing, but I think this would be harmful for our community because of the optics. It would break the trust that currently exists between BWXT and the community. There is already considerable unrest here. I am not anti-nuclear as some of my neighbours are, but I do need transparency in order to maintain a good relationship with BWXT and, by extension, the CNSC.

My request is that the CNSC deny BWXT their request for a confidential hearing on the grounds that it would be detrimental to the public good because of the lack of transparency and trust that may stem from that.

Regards,  
Scott Donovan

**From:** [Steve Daniels](#)

**Sent:** Sunday, January 7, 2024 11:53 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201135} BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hi,

I am writing to you because I have just learned that BWXT wants to confidentially change its decommissioning plan in Peterborough, Ontario.

You promised us transparency and then approved this request to keep these changes hidden!

While I have no faith in your processes, I request that you insist that BWXT keep all operational plans and subsequent changes visible to the community of Peterborough and its citizens.

steve daniels

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Steve Daniels ([pronounce](#))

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**From:** [Neil Hannam](#)

**Sent:** Sunday, January 7, 2024 12:29 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-doc 7201141} BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

To whom it may concern:

BWXT should not be allowed to make changes in confidence. What have they got to hide?

The last time an extra day of hearings had to be added, so why let them go confidential this time?

Please respond and make the hearing open.

Neil

Neil Hannam, MA



**From:** Kerri Moloney

**Sent:** Sunday, January 7, 2024 12:30 PM

**To:** Interventions / Interventions (CNSC/CCSN)

**Subject:** {e-Doc 7201145} BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

To Whom It May Concern - I am a current resident of Peterborough ON who lives close to the BWXT Peterborough site. I say NO to the request for confidentiality.

Kerri Moloney  
Peterborough, Ontario

**From:** [Sherry Hillman](#)

**Sent:** Sunday, January 7, 2024 12:41 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201149} BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

BWXT Peterborough decommissioning plan - I say NO to confidentiality. **What is there to hide?**

Sherry Hillman

I respectfully acknowledge that I live on Michi Saagiig Anishnaabe lands and the traditional territory covered by the Williams Treaties. I take responsibility for working to understand and challenge the constructs of settler colonialism as they exist on this land, and in the spaces I participate in.

**Even a wounded world is feeding us. Even a wounded world holds us, giving us moments of wonder and joy. I choose joy over despair. Not because I have my head in the sand, but because joy is what the earth gives me daily and I must return the gift.** - Robin Wall Kimmerer, *Braiding Sweetgrass*

**From:** [A Eidt](#)

**Sent:** Sunday, January 7, 2024 1:15 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201152} BWXT Decommissioning Plan

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hello,

I am writing to ask that BWXT's Decommissioning Plan not be granted confidentiality. There are too many neighbouring stakeholders – including the school just across the street where my child will be attending – to leave the public unaware of next steps. Transparency can allow for greater safety for our community.

Thank you,

Anna Eidt  
Peterborough, Ontario



**From:** Philip McMichael  
**Sent:** Sunday, January 7, 2024 1:38 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** {e-Doc 7201156} No

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Bwxt decommissioning plan: I say NO to confidentiality!!

Sent from my iPhone

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**From:** Wendy Schmied  
**Sent:** January 7, 2024 1:47 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough say No to confidentiality!

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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I am writing to share my serious concerns about BWXT Peterborough asking for confidentiality for their decommissioning plan. This facility is located in downtown Peterborough only 25 m from a Public school full of young children. Promises of transparency were shared. Obviously this is not happening, also the sneaky way they pushed the confidentiality piece after the public submission time has passed. What is there to hide? We need to say NO to the request for confidentiality! We want to know what does the decommissioning plan means for property values, children attending school across the street and the heavily contaminated land and buildings adjacent to the facility. Please say NO!

Sincerely  
Wendy Schmied  
LAKEFIELD, Ont

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**From:** SUNNY  
**Sent:** January 7, 2024 2:10 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To whom it may concern:

I am a resident of Peterborough, and I live within 3km of the BWXT Monaghan Road site. I think that it is justified for residents of Peterborough to know what BWXT's decommissioning plan is, and thus for the decommissioning plan **to not be kept confidential**. BWXT claimed they would maintain transparency -- allowing the details of the process to be obscured from public eyes does not seem like a good faith endeavour.

If they have nothing to hide, why should BWXT be afraid of the decommissioning process being public? Parents of the children attending Prince of Wales Public School deserve to know and be a part of decisions being made regarding BWXT's future, as do all residents on Wolfe St., and Peterborough in general. Keeping BWXT's decommissioning plans and processes public is part of a good corporate citizenship culture, and is essential to nuclear safety in this country.

Thank you for your consideration.

In kindness,  
Sunny Malik

**From:** [Jessica Rowland](#)

**Sent:** Sunday, January 7, 2024 1:46 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201159} BWXT Peterborough decommissioning plan-NO to Confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Hello!

I recently learned that BWXT has asked for confidentiality in an application to change it's decommissioning plan.

I SAY NO to confidentiality.

The public needs to have informed consent on this issue as it affects public safety and public health in the community and surrounding areas.

WE WANT Transparency and public consultation on these important matters.

For future generations.

Thank you for your time and consideration.

Corporations and private and public businesses should NOT be able to take the power of free- informed consent and information related to public health and safety FROM citizens and residents in a democracy.

Please be respectful.

NO to confidentiality in matters affecting the public related to BWXT or any related or subsequent companies.

Sincerely,  
Jess Rowland

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**From:** anne cole  
**Sent:** January 7, 2024 3:15 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To: Commission Registry,  
A reputable company would be transparent. What are they wanting to hide?  
If everything is safe there is no need for confidentiality.  
Anne Cole,  
Peterborough, ON  
Get [Outlook for iOS](#)

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**From:** Suzanne Vaillancourt  
**Sent:** January 7, 2024 3:28 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Dear Lisa Thiele and **Denis Saumure**,

I hope you are both well and enjoyed your Christmas holidays. It has come to my attention that BWXT in Peterborough, Ontario has applied for confidentiality. I feel this is not in the interest of the community. It is important that they remain transparent. I find it deeply upsetting that the commission would even consider such a request. It is an insult to the residents and children who attend the school adjacent to the factory. So I plead with you as a resident of Peterborough and a Canadian citizen that you do the right thing and make transparency mandatory. I thank you for your consideration and look forward to happier days and bluer skies.

All the best,

Sincerely,

Suzanne

Suzanne Vaillancourt

Peterborough



FUNKY BUDDHA  
COLLECTION

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**From:** Bill Templeman  
**Sent:** January 7, 2024 4:20 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Cc:** Jeff Leal; Joy Lachica; michelle.ferreri@parl.gc.ca; Theresa McClenaghan; Jacqueline Wilson; abierk@peterborough.ca; Thomas Piggott  
**Subject:** BWXT's Application for Confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To Whom It May Concern at the CNSC:

I am writing to you to request that BWXT's application for confidentiality in changing its decommissioning plan for its operation on Monaghan Road in Peterborough, Ontario be denied.

What this change in its decommissioning plan means is unclear. If this corporation is granted confidentiality, residents living close to BWXT's plant won't ever know what it means. As a resident living approximately .6 km from this plant, I want to know what the revised decommissioning plan means for:

- **Property values in Peterborough?**
- **Children attending school across the street?**
- **The heavily contaminated land and buildings immediately adjacent to the facility?**
- **Long-term liability for the City of Peterborough and all its residents?**

The implications of this change in BWXT's decommissioning plan are not clear; these changes must be a matter of transparency and public consultation. The deadline for making submissions regarding this application by BWXT for confidentiality is January 10th. Thank you for extending this submission deadline from its original December date.

Respectfully yours,

Bill Templeman

Peterborough, ON

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**From:** K Brown  
**Sent:** January 7, 2024 5:01 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** MANDATE PUBLIC CONSULTATION for BWXT's Peterborough decommissioning plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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I understand BWXT is applying to change its decommissioning plan and has requested to be granted confidentiality in this process.

THIS PROCESS MUST BE TRANSPARENT AND SUBJECT TO PUBLIC CONSULTATION.

It is very suspect that BWXT wants to avoid public scrutiny and to keep its decommissioning plans hidden. The mere fact that BWXT is requesting confidentiality strongly suggests that BWXT has something to hide that it does not want the public to know about.

If BWXT's request to hide this process from public scrutiny is granted, what will they (or other corporations) seek to similarly keep hidden from public scrutiny and awareness in future?

The public has a right to know what the proposed changes to BWXT's decommissioning plan are and to have the opportunity to understand and evaluate such proposed changes to their plans.

What the proposed changes are is unclear, and if this corporation is granted confidentiality, we won't ever know. We want to know what the revised decommissioning plan means for, but not limited to:

- The health and safety of the Peterborough population at large.
- The health and safety of the vulnerable population of children attending public school across the street.
- The health and safety of the and the residents in the local area.
- The heavily contaminated land and buildings on and immediately adjacent to the facility.
- Property values in Peterborough.

The implications are not clear and only via the public consultation process can light be shed on what BWXT is proposing.

Clearly there is great public interest in the operations of BWXT which is located, as you know, in the midst of a residential area here in Peterborough.

You will recall that there were a record number of intervenors at the last (not confidential) license hearing and CNSC had to add an extra day of hearings.

The public must not be disenfranchised from the normal, and mandated, public consultation process simply at the behest of a corporation (BWXT).

**I say NO to this request for confidentiality!**



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**From:** Leslie McGrath  
**Sent:** January 7, 2024 5:11 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Cc:** Citizens Against Radioactive Neighbourhoods  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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I understand that BWXT has applied to have confidentiality in the process to change its decommissioning plan. As a citizen of Peterborough, I have many concerns about what confidentiality in the process would mean for my city, my neighbourhood and my neighbours.

I am strongly opposed to confidentiality being granted to BWXT as the implications are not at all clear.

I respectfully request that the CNSC *not* grant the request for confidentiality. I request that the process be transparent and that the public be fairly consulted in said process.

Thank You,  
Leslie McGrath  
Peterborough



Virus-free. [www.avg.com](http://www.avg.com)

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**From:** Erica Martin  
**Sent:** January 7, 2024 5:13 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough Decommissioning Plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To whom it may concern:

My name is Erica Martin. I live in Peterborough, in the heart of the neighbourhood where BWXT is located. For 10 years, my children went to the elementary school directly across the street from the BWXT site.

I understand that BWXT intends to begin a decommissioning plan and that they have applied to keep this plan confidential. This lack of transparency is not in the public interest, especially for those of us who live, work and raise our children in the nearby area. BWXT should not be allowed to withhold details of its plan indefinitely from the affected public.

In addition, I am interested in knowing whether the taxpayers of Canada and, specifically, in Peterborough will be required to pay any costs for BWXT decommissioning and restoration of the lands. If so, I (and other taxpayers) have a right to know what those costs are estimated to be. A detailed accounting of all steps and costs associated with the decommissioning is essential for transparency and accountability to the public of BWXT's operations, now and in the future. The confidentiality requested by BWXT violates these important democratic principles.

I strongly object to BWXT making plans for decommissioning without letting its neighbours know what will be happening, when it will happen and who will pay for it. What does BWXT not want the public to know? If BWXT has nothing to hide, they should be prepared to share their plan with the residents of Peterborough and surrounding areas.

It is the role of the CNSC to act in the public interest. Confidentiality does not inspire confidence in the CNSC's ability to do this. It also does not allow for public scrutiny and informed debate on issues affecting our homes, our livelihoods and our children's futures. Therefore, I request that BWXT should not be granted confidentiality as it submits its decommissioning request.

Thank you for your assistance. I look forward to hearing from you about your decision regarding BWXT's illogical request.

Sincerely,

Erica Martin

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**From:** Devon Code  
**Sent:** January 7, 2024 5:14 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Hello,

I write out of concern regarding BWXT Peterborough's request to change its decommissioning plan.

I am extremely concerned about the confidentiality request. It is very important that any implications for the impact on Prince of Wales Public School as well the heavily contaminated land and buildings immediately adjacent to the facility remain public knowledge.

Allowing confidentiality in this matter is not in the public interest.

Thank you for hearing my concern.

Devon Code  
Peterborough, Ontario

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**From:** sheila.collett  
**Sent:** January 7, 2024 6:24 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Dear Sir/Madam,

Please note that I object to BWXT's request for confidentiality in its application to change its operations.

I believe that transparency is at the heart of public safety, and in the public's trust in the principles of democracy and fairness for all.

It is important that the people living in the immediate neighbourhood and in all of Peterborough, understand the implications that a revised decommissioning plan might have on property values, the wellbeing of children attending school across the street, and on the already heavily contaminated land and buildings immediately adjacent to the facility.

In short, if there is nothing to hide, why this desire for confidentiality?

Thank you for your consideration.

Sheila Collett  
Peterborough, Ont.

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**From:** Emily Straka  
**Sent:** January 7, 2024 6:41 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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The purpose of this email is to urge the Commission to say NO to BWXT Peterborough being granted confidentiality as it changes its plan for this property in Peterborough. Because the BWXT property in Peterborough is in a residential area and extremely close to a public elementary school, there should be closer scrutiny of any change in plans!!!

The last license hearing was open to public comment and scrutiny (not confidential) and because of the record number of intervenors, the CNSC had to add an extra day! The fact that SO many people took time to prepare presentations, should tell you how important this issue is to the residents of Peterborough! Residents have concerns about BWXT's unknown new plans and more concerning is BWXT's desire to keep their plans confidential. The commission should be questioning why BWXT is applying to change its plan and why, more importantly, do they want to change their plans confidentially, without informing the public or allowing consultation???

Residents have the right to know how BWXT is going to deal with the heavily contaminated land and buildings immediately adjacent to the facility! Why does BWXT want to be secretive about their plans? What are they trying to hide?

Since **the Commission's mandate is to** "regulate(s) the use of nuclear energy and materials to **protect health, safety, security and the environment**" I am urging the Safety Commission to say **NO** to this request for confidentiality and to insist that BWXT be transparent with residents about their plans. I urge you to protect the health and well being of Canadians, to uphold the Commission's mandate, and to install public confidence in our safety commission.

Respectfully submitted,

Emily Straka

Peterborough, ON

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**From:** Cathy Shadbolt  
**Sent:** January 7, 2024 7:44 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** No confidentiality for BWXT decommissioning plan.

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

What I have seen of BWXT to date assures me that the company is a responsible corporate citizen. However, a request to keep its decommissioning plan confidential seems odd at best and unreasonable. The community has every right to know any decommissioning would not put it at risk.

Catherine Shadbolt

Peterborough ON  
Sent from my iPad

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**From:** Charlotte Kennedy  
**Sent:** January 7, 2024 7:54 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Hello members of the Canadian Nuclear Safety Commission (CNSC),

BWXT, the nuclear facility located in downtown Peterborough, has applied to change its operations. It should NOT be granted confidentiality in this process. It must be fully transparent.

Given that CNSC promised transparency and good corporate citizenship, this request for confidentiality is highly suspect.

I repeat, BWXT is a **nuclear facility**. There are children attending school across the street. There are heavily contaminated land and buildings right there by the facility. People live and drive and walk in the area all the time. It is right downtown!

We who are citizens of this city have every right to full and clear information.

Please nix the confidentiality and bring forward full transparency.

Thank you,  
Charlotte Kennedy  
Citizen of Peterborough

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**From:** Margaret and Richard Abbott  
**Sent:** January 7, 2024 8:37 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWTX Decommission plans

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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BwtX should NOT be granted confidentiality regarding decommissioning plans for their facility in Peterborough. This facility is across the street from an elementary school and in a residential area- it should never have received your approval in the first place.

People deserve transparency about decommissioning plans and the impact that this facility has and will continue to have.

We look forward to your reply specific to this issue.

Peggy and Richard Abbott.



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**From:** Stunt Ventriloquist  
**Sent:** January 7, 2024 8:56 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To whom it may concern,

I say NO to confidentiality in regards of BWXT decommissioning plan.

The proximity to residents and a public school necessitates transparency and will lead to informed future decisions.

Thanks,

Tim Holland

[www.stuntventriloquist.com](http://www.stuntventriloquist.com)

Sent from my iPhone

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**From:** James Deutsch  
**Sent:** January 7, 2024 9:43 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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I strongly believe in transparency in deliberations on matters that affect public health. I therefore oppose any arrangement that would limit public awareness and access to all aspects of the process regarding BWXTs plans in Peterborough.

Are we not a democracy?

James Deutsch, MD, PhD, FRCPC  
University of Toronto

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**From:** Dan Peer  
**Sent:** January 8, 2024 4:14 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality!!! YES to transparency!!!

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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**Confidentiality? What is there to hide?**

**WHAT'S THE BIG RUSH??? WHATEVER HAPPENED TO TRANSPARENCY??? GIVE THE PEOPLE TIME TO FIGURE IT OUT, TELL THEM EVERYTHING - IT'S OUR HOMES, OUR KIDS, OUR CITY - WHAT IS GOING ON HERE???**

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**From:** P S  
**Sent:** January 8, 2024 7:45 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Confidentiality? What is there to hide?

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**From:** Maggie Bakker  
**Sent:** January 8, 2024 7:58 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To whom it may concern:

I am shocked that a company that put flyers in my mailbox a couple of years ago assuring us that they would be transparent and consider the concerns of whole neighborhood is now applying to change its operations and is asking to be granted confidentiality in this process.

This can only mean that BWXT has something to hide from this neighborhood, plans that would be extremely alarming and upsetting. There are the children attending the school across the street, the heavily contaminated land and buildings immediately adjacent to the facility, and blocks of homes in all directions to be considered. The facility is situated in the middle of peoples backyards and parks, a totally inappropriate location for any nuclear facility in the first place.

How dare they think they have a right to make plans and decisions without the consent of their immediate school and neighborhood citizens, without consultation and transparency?

I say NO to confidentiality.

Margaret and Frederick Bakker

Peterborough ON

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**From:** Jeff Brackett  
**Sent:** January 8, 2024 8:49 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Decommissioning Plan should not be a secret.

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

It has come to my attention that the BXWT nuclear facility in Peterborough Ontario is requesting confidentiality as it submits its decommissioning plan to the Canadian Nuclear Safety Commission. I urge the CNSC to reject this request. The process must be transparent and open to allow the public to be fully informed of decisions that can impact their lives, especially in neighbourhoods adjacent and downwind/downstream of the decommissioning process.

Jeff Brackett

Millbrook Ontario

**From:** [Adam prinsen](#)

**Sent:** Monday, January 8, 2024 9:13 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201410} BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

BWXT Peterborough decommissioning plan - I say NO to confidentiality.

***Adam Prinsen ND***

From: [Dani](#)

Sent: Monday, January 8, 2024 9:18 AM

To: [Interventions / Interventions \(CNSC/CCSN\)](#)

Subject: {e-Doc 7201412} BWXT Peterborough decommissioning plan - WE DEMAND  
TRANSPARENCY!

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

**ARE YOU THE GOVERNMENT FOR THE  
PEOPLE OR AGAINST THE PEOPLE AND FOR  
BIG BUSINESS???**

**WHAT'S THE BIG RUSH??? NICE AND EASY -  
LET'S HEAR WHAT'S GOING ON HERE! ARE  
YOU TRYING TO HELP SOME BIG BUSINESS  
GET AWAY WITH SOMETHING SINISTER  
THAT IS AGAINST COMMON SENSE AND  
WELL-BEING OF THE COMMUNITY???**

**SHAME ON YOU - GIVE THE CITIZENS OF  
THIS CITY TIME TO UNDERSTAND AND  
RESPOND - give them all the facts, invite  
them for the meetings, don't play games!**



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**From:** Richard Straka  
**Sent:** January 8, 2024 9:41 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** Transparency Regarding activity involving nuclear energy

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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## Canadian Nuclear Safety Commission

I am writing in **OPPOSITION** to BWXT Peterborough being granted confidentiality as it changes its plan for decommissioning its property located in Peterborough. Because the BWXT property in Peterborough is in a residential area and extremely close to a public elementary school, there should be full transparency and careful scrutiny of any change in plans for use or the plans for decommissioning of the property.

The Public, especially residents the vicinity of the property engaged in activity involving nuclear materials have the right to know how BWXT is going to deal with the heavily contaminated land and buildings immediately adjacent to the facility! BWXT has to be held responsible and remain transparent regarding its plans for the use of land involving materials associated with nuclear energy.

Since **the Commission Registry's mandate is to** "regulate(s) the use of nuclear energy and materials to **protect health, safety, security and the environment**" I am urging the Safety Commission to say **NO** to this request for confidentiality and to insist that BWXT be transparent with residents about their plans. I urge you to protect the health and well being of Canadians, to uphold the Commission's mandate, and to install public confidence in our safety commission.

Respectfully submitted,

Richard Straka

Peterborough, ON

**From:** Belinda Cole

**Sent:** Monday, January 8, 2024 10:38 AM

**To:** Interventions / Interventions (CNSC/CCSN)

**Cc:** carnptbo

**Subject:** you've got to be kidding, BWXT! Confidentiality request.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hello decision makers,

What a surprise! BWXT's request for confidentiality is posted AFTER the deadline for community feedback passed.

In order to keep everyone safe, full disclosure about every step of the decommissioning process is essential. No hidden secrets, thanks. They will protect BWXT's interests, but not those of citizens.

You have the chance to respond with truth and integrity and insist that all parts of the decommissioning process are fully available to all of us affected by the process.

Will you do that?

Thank you in advance, for deciding on the high road that protects all beings, instead of BWXT's corporate interests.

Belinda Cole

**From:** [Beige McIntosh](#)

**Sent:** Monday, January 8, 2024 11:11 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT Peterborough; I say NO to confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Dear Commission Registry,

I am in opposition to the BWXT Peterborough's request for confidentiality for their decommissioning plan. It would seem that the Nuclear Safety Commission's mandate to improve transparency was set in place to protect the public. Please ensure BWXT Peterborough is not granted confidentiality.

Thank you,

Beige McIntosh,  
Peterborough Resident

**From:** [paul baines](#)

**Sent:** Monday, January 8, 2024 11:36 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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I want to know what the revised decommissioning plan means for:

Property values in Peterborough?

Children attending school across the street?

The heavily contaminated land and buildings immediately adjacent to the facility?

This becomes impossible with BWXT's recent request to change its operations.

The public interest is best served with more transparency -- not less.

paul baines  
Peterborough, Ontario

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**From:** Krista English  
**Sent:** January 8, 2024 12:36 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** Decommissioning

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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To Whom this applies,

I understand that BWXT has applied to have confidentiality in the process to change its decommissioning plan. As a citizen of Peterborough, I have many concerns about what confidentiality in the process would mean for my city, my neighbourhood and my neighbours.

I am strongly opposed to confidentiality being granted to BWXT as the implications are not at all clear.

I respectfully request that the CNSC *not* grant the request for confidentiality. I request that the process be transparent and that the public be fairly consulted in said process.

Thank You,  
Krista English

**From:** [Helmar Drost](#)

**Sent:** Monday, January 8, 2024 12:39 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT's request for confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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I am appalled by the request of BWXT that proposed changes to its operation should be kept confidential. Are we living in a third world country where a private company producing radioactive material is asking a Government agency that the public should be kept in the dark about its activities that potentially affect the health and wellbeing of people? I urge the CNSC to reject BWXT's request for confidentiality.

Respectfully,

Helmar Drost, Ph.D.

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**From:** sue mackay  
**Sent:** January 8, 2024 12:58 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Good evening!

In regards to BWXT Peterborough decommissioning plan - I say NO to confidentiality.

BWXT should have nothing to hide. Considering the tremendous concern Peterborough citizens have shown surrounding the activities and manufacturing of radioactive materials, it is paramount that BWXT be open, transparent, and forthright in all current and future plans. Nothing should be hidden and all decisions should include the input of the community.

It is outrageous that BWXT is once again trying to fly under the radar with their request for secrecy AFTER the time of input is over!

I truly wonder if any of us can be safe with lack of quality oversight in this dangerous undertaking.

I say no to confidentiality! say no to the request for secrecy! The citizens of Peterborough have a right to know what is going on, especially anything that involves BWXT.

Sincerely,

Sue MacKay

Sent from my iPad

**From:** [Linda McNamara](#)

**Sent:** Monday, January 8, 2024 1:10 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#); [michelle.ferreri@parl.gc.ca](mailto:michelle.ferreri@parl.gc.ca)

**Subject:** BWXT Peterborough DeCommissioning Plan

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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JUST NOW have I been informed that BWXT in Peterborough has applied to change its operations and is asking to be granted confidentiality from the families, neighbours and general public as to the particulars of this change in operations. Can one hope that a decision around MOVING all such operations to a more acceptable location is a secret or is this some stealthy process to become a scarier neighbour than they have already become?

During the last “hearing” where the only one being heard was BWXT they promised to be better neighbours and more transparent instead of an enormous, ominous eyesore in the centre of a family neighbourhood in close proximity to a public school. This massive building and its secrecy looks more like a military target. If the concealed operations inside require it to be “classified” in nature then it should be closed down and moved to a much less populated location.

This huge amount of land, upon which BWXT occupies, if it is not too full of poisons from previous operations, could be used for building affordable housing.

It is with hope that I send this e-mail that the good conscience of those making the decision around confidentiality and BWXT will rise to the spirit and practice of democracy,

Linda McNamara



**From:** [Bea Chan](#)

**Sent:** Monday, January 8, 2024 1:12 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Hello,

It is very concerning to me when industry requests confidentiality for activities that will affect the neighbourhoods and areas in which they reside. The fact that BWXT is located in a residential neighbourhood and in such close proximity to a school is extremely concerning and extra measures of transparency and safety should be taken around this site. Please say NO to confidentiality for BWXT Peterborough decommissioning plan. We need to know what they are doing in our community.

Thank you

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Beatrice Chan

**From:** [CAROLINE TENNENT](#)

**Sent:** Monday, January 8, 2024 2:01 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

BWXT Peterborough decommissioning plan - I say NO to confidentiality.

BWXT is applying to change its decommissioning plan. What this means is unclear, and if this corporation is granted confidentiality, we won't ever know what it means. We want to know what the revised decommissioning plan means for:

- **Property values in Peterborough?**
- **Children attending school across the street?**
- **The heavily contaminated land and buildings immediately adjacent to the facility?**

*The implications are not clear and must be a matter of transparency and public consultation.*

Sincerely,

Caroline Tennent

**From:** [Gerry Harris](#)

**Sent:** Monday, January 8, 2024 4:36 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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We have had problems with confidentiality with this company before

we Want OPEN and HONEST discourse so we can what is happening only 25 M from a PUBLIC SCHOOL with out children walking by this facility

We HAVE to know - STOP the confidentiality

Gerry Harris  
Peterborough ON

**From:** [Care Archbold](#)

**Sent:** Monday, January 8, 2024 4:39 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** {e-Doc 7201425} BWXT Peterborough decommissioning plan

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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To Whom it May Concern,

I say NO to confidentiality for BWXT's decommissioning plan.

As a community member who lives in the neighbourhood of BWXT Peterborough and a parent with a child that attends Prince of Wales Public School I deserve to be informed of all actions to be taken by BWXT Peterborough.

Sincerely,  
Care Archbold  
Peterborough ON

**From:** [luv2boat2](#)

**Sent:** Monday, January 8, 2024 5:50 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** \*\*\*BWXT Peterborough decommissioning plan - I say NO to confidentiality\*\*\*

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

**BWXT Peterborough decommissioning plan - I say NO to confidentiality.**

There must be full transparency, especially for the human beings who live and work and or go to school in the nearby area.

There should be nothing to hide if there is nothing bad happening.

Thank you.

Marie

Sent with [Proton Mail](#) secure email.

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**From:** Melanie Buddle  
**Sent:** January 8, 2024 8:24 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - registering my opposition to a request for confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Hello,

I just found out (thanks to vigilant community members) that BWXT (a nuclear facility in downtown Peterborough, 25 m from a public school) has applied to change its operations *and is asking to be granted **confidentiality** in this process.*

Despite the Canadian Nuclear Safety Commission mandated improvements and promises of transparency and good corporate citizenship for BWXT after our last 'fight,' this request for confidentiality was posted after the deadline for community feedback...which doesn't feel very transparent to me.

As a community member who lives near the site: I have some feedback!

All I know is that BWXT is applying to change its decommissioning plan. What this means is unclear, and if this corporation is granted confidentiality, I won't ever know what it means. That makes me uneasy.

I personally cannot think of any reason why this company should have the right to keep their requests confidential given their stated desire to be 'good neighbours.'

As many of us have outlined, many ways and many times, it is problematic to have an industrial site - nuclear-related or not - in a densely populated downtown core right across from a school. Whether this industrial location was making balloons, baseball bats, fertilizer or frying pans, I'd STILL question the logic of doing so right next to a school. Large industrial operations pose risks to neighbourhoods (fires;fumes; industrial accidents; additional traffic; pollution) and should be in industrial zones - not in historically designated "past" industrial zones that are now in the heart of a city. This is particularly true when the industry involves the nuclear industry.

So... if the goal here is to help the community feel reassured about transparency and safety, then I'd like to ask that none of their actions or requests be able to be confidential. We want to know what is happening in our backyards. IF it's nothing strange or unusual, then I see no reason to keep it confidential.

Thank you.

Dr. Melanie Buddle  
Peterborough, Ontario



**From:** [James Wilkes](#)

**Sent:** Monday, January 8, 2024 8:28 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201475) BWXT Peterborough - say NO to BWXT confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Attention CNSC - Canadian Nuclear Safety Commission:

I understand that BWXT in Peterborough has applied for a confidential process to change its decommissioning plan.

As a citizen of Peterborough, I have many concerns about what so-called confidentiality would mean for my city, my neighbourhood, and my neighbours.

I strongly oppose BWXT's request for confidentiality as the implications are not at all clear.

With respect, I expect that the CNSC *will not* grant BWXT's request for confidentiality.

I request that the process be transparent, informed, and democratic, and that the public be fairly consulted in said process.

Thank you,  
James Wilkes

**From:** [Craig Niziolek](#)

**Sent:** Monday, January 8, 2024 9:08 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201478) BWXT Peterborough decommissioning plan

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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I as a Human Being and a child of God demand transparency!

I say NO to confidentiality!

The amount of concerned citizens in the City of Peterborough demand your attention to this matter.

The owners of these crown corporations who pull the strings of corporations hide behind a veil of secrecy. These elite families do not care about life. These families have committed the biggest atrocities and genocides known to man.

Government agencies must stop accepting bribes and do the job of protecting the environment and protecting the citizens that they were elected and hired to do. For if you continue to be minions of these greedy, unsasable families, your life will be counted for nothing.

This is the time to wake up and save your own soul and stop being a puppet for Satan.

Craig Niziolek



**From:** [G F](#)  
**Sent:** Monday, January 8, 2024 9:36 PM  
**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)  
**Subject:** (e-Doc 7201481) BWXT: Confidentiality Objection

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hello,

The CNSC website states your vision is to "be a world class nuclear regulator." A key area of this involves the "dissemination of scientific, technical and regulatory information concerning the activities of CNSC, and the effects on the environment, on the health and safety of persons, of the development, production, possession, transport and use of nuclear substances."

You state you are in the business of safety and the dissemination of information.

In December when a public announcement by BWXT was released after the date responses were due, the CNSC extended the deadline. This is reasonable and helps the dissemination of information.

In 2020, when a record number of people wanted to address your public hearing in Peterborough regarding BWXT, an extra day was added to hear public concerns. This too is a reasonable response of a responsible regulator.

The professionalism of the 2020 hearings was outstanding. But granting confidentiality to BWXT for its next phase of operations appears shady, more North Korea or Stalin than a regulator that values transparency and the dissemination of information.

Citizens of Peterborough are eager to know what is happening in their community. You have, in the past, honoured this interest.

What is there to hide?

How does it help the CNSC's vision to become a world class regulator by allowing a nuclear facility inside a city 25 metres from a public school to hide its next steps?

In addition, the legal language of the entire process is intimidating, demands immense attention and a very high level of (legal) literacy. It is not a clear process. Can you design a process that is transparent, written in clear language, and accessible to everyone?

You know the phrase, when the only tool you have is a hammer, everything looks like a nail? Well, there is a time and a place for fine tuned legalese and a nuclear regulator certainly deals with

those things (for example, in court challenges). However, get your head out of the weeds and look around, broadly, at the public you serve. They do not have their brainpans in legal documents all the time. It's obfuscating impenetrable jargon. This is not inclusive. It only includes lawyers and educated bureaucrats. It's institutional narcissism to think this represents the general public.

Stick to your stated mission. Disseminate information. Don't hide it in a convoluted legal process. Your stated vision is to be a world class regulator: how exactly does granting confidentiality to BWXT and not making the public consultation process clearer and more understandable help you disseminate information and reach your vision?

I am concerned about a nuclear facility in the middle of my city, and mainstream culture would consider me educated (I have three degrees and teach in a post-secondary institution) *yet I cannot follow the legal bla bla bla of this process.*

Create a more accessible process.

Are you an aspiring world class regulator or a kept regulator?

If you are in the business of disseminating information, disseminate information. Clearly.

Do not grant confidentiality to BWXT.

George Fogarasi

**From:** [Dale and Linda Godin](#)

**Sent:** Monday, January 8, 2024 11:13 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** BMWXT Peterborough decommissioning plan- I say NO to confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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I am very disappointed and alarmed that BWXT is requesting confidentiality as it submits its decommissioning request. Why should BWXT not want transparency to the public? I am very concerned about the safety of the citizens of Peterborough and the young children attending school in very close proximity to this nuclear facility.

I DO NOT want BMWXT to have confidentiality in their unknown plans for its decommissioning request.

We must keep safety first for the citizens of Peterborough.

Sincerely,  
Linda Godin

**From:** [Anne White](#)

**Sent:** Tuesday, January 9, 2024 5:41 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-doc 7201486) BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear regulators,

It has come to my attention that BWXT Peterborough is requesting to make its operations and decision -making confidential. I would like to know what BWXT has to hide from its neighbours, the citizens of Peterborough and residents of surrounding areas in the local environment. People have a right to know what decisions are being made and how these decisions could impact health, property values and the local natural environment.

Will you commit to doing the right thing as our regulator and reject BWXT's request for confidentiality? Will you put communities and people's health before corporate greed?

Sincerely,  
Anne White

**From:** [Kelly King](#)

**Sent:** Tuesday, January 9, 2024 11:01 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201489) Please vote NO to BWXT Peterborough's request for confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Attention CNSC - Canadian Nuclear Safety Commission:

I understand that BWXT in Peterborough has applied for a confidential process to change its decommissioning plan.

As a citizen of Peterborough, I have many concerns about what so-called confidentiality would mean for my city, my neighbourhood, and my neighbours.

I strongly oppose BWXT's request for confidentiality as the implications are not at all clear.

With respect, I expect that the CNSC *will not* grant BWXT's request for confidentiality.

I request that the process be transparent, informed, and democratic, and that the public be fairly consulted in said process.

Sincerely,  
Kelly King

**From:** [Patricia Remy](#)

**Sent:** Tuesday, January 9, 2024 5:41 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201493) BWXT decommissioning plan -- I say no to confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Hello Canadian Nuclear Safety Committee

Recently I read a report that BWXT will proceed with its decommissioning plans without input from the community, i.e. from anyone who is aware of the dangers of nuclear waste and, most pertinently, from those who live in the vicinity of the BWXT site in Peterborough.

Have you any sense of what corporate responsibility means? If so, please explain to me what that term means to you.

Looking forward to your reply  
Patricia Remy

Sent from [Mail](#) for Windows

**From:** [Julie Cosgrove](#)

**Sent:** Tuesday, January 9, 2024 6:05 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201502) Concern re: Confidentiality of BWXT Peterborough Decommissioning Plan

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Attention CNSC - Canadian Nuclear Safety Commission:

I understand that BWXT in Peterborough has applied for a confidential process to change its decommissioning plan and strongly oppose this request to allow for a transparent, accountable process.

The very fact that BWXT is requesting confidentiality is a RED FLAG for our community, raising numerous concerns about the potential impacts of this plan. It's just another example of how BWXT continues to fall short of expectations with respect to communication with the citizens of Peterborough, including neighbouring schools.

Given the history and already tumultuous relationship between BWXT and its neighbours, I request that the CNSC *will not* grant BWXT's request for confidentiality; also, that the process be transparent, informed, and democratic, and that the public be fairly consulted in said process.

Thank you for your consideration,  
Julie Cosgrove

**From:** [Kerri Snoddy](#)

**Sent:** Tuesday, January 9, 2024 6:24 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201505) BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Good Evening,

I am writing because I was recently made aware that BWXT (a nuclear facility in downtown Peterborough, 25 m from a public school) has applied to change its operations and is asking to be granted confidentiality in this process. I am a resident of Peterborough and this request for confidentiality concerns me. I believe that anything regarding changes in operations at this facility should be transparent to the public.

Questions arise concerning what the revised decommissioning plan means for:

- Property values in Peterborough?
- Children attending school across the street?
- The heavily contaminated land and buildings immediately adjacent to the facility?

The public won't be able to consider these impacts unless transparency is provided and BWXT is not granted confidentiality to the change in operations. Thank you.

Kerri



**From:** [D L](#)

**Sent:** Tuesday, January 9, 2024 6:39 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201508) Transparency for BWXT operations in Peterborough, Ontario

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Dear CNSC and to whom it may concern

A cooperative and collaborative relationship between yourselves and our fair community of Peterborough will greatly rely on your efforts and desire to remain transparent in the nuclear facilities operating here in our city.

Granting BWXT (here in Peterborough, Ontario \*or anywhere) a veil of secrecy is not the way a governing body like yourself should impose its authority. This will only lead to greater community distrust, resistance and resentment towards both BWXT and yourselves. It will also force opposition of the facilities to take alternate measures to try to halt very questionable decisions already in operation sadly.

I really hope not only that you do not grant any privacy or secrecy to these operations but heavily weigh and consider the value of moving these operations to a less populated area where ongoing resistance, impacts and future dissonance and friction could be avoided.

Thank you for your consideration

Douglas Litchfield

**From:** [Matt Dutry](#)

**Sent:** Tuesday, January 9, 2024 10:56 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Cc:** [James Wilkes](#)

**Subject:** (e-Doc 7201515) BWXT Peterborough decommissioning plan - I say NO to confidentiality

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| EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE |
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Attention CNSC - Canadian Nuclear Safety Commission:

It has come to my attention that BWXT has requested a confidential process for their decommissioning plan. Furthermore, this request was posted after the deadline for community feedback had passed. This is NOT acceptable.

The implications that this process has for the public and its surrounding Peterborough community needs to be made clear. As a nearby resident, I do not accept this approach as demonstrating good faith or due diligence in planning. The approach MUST involve transparency and public consultation.

In hearing these concerns from affected community members, I expect that CNSC will reject BWXT's request for confidentiality.

Thank you for your understanding in advance of this matter.

With best regards,

Matt Dutry

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Matt Dutry

I respectfully acknowledge the land, air, water, and sunlight on which human and non-human life depend. I appreciate that human life is fundamentally interdependent with plant and non-human life. Any departure from this understanding is not a meaningful concept. In order to rationally pursue well-being, these relationships must inherit priorities that continue to be misplaced. Furthermore, I acknowledge the undermining of our human to human relationships in Treaty agreements within Canada. Specifically, I endeavour to aid the restoration of these relations through food-sovereignty-based work on lands governed by the Williams Treaty in Nogojiwanong (Peterborough, Ontario).

**From:** [Rob Gibbison](#)

**Sent:** Tuesday, January 9, 2024 11:19 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)

**Subject:** (e-Doc 7201519) BWXT confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Transparency only. Chem's in the water table for decades already.

**From:** Kate Haines  
**Sent:** Wednesday, January 10, 2024 10:33 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** (e-Doc 7201525) BWXT Peterborough

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

I am a close neighbour to BWXT and I am appalled that all of our efforts to maintain an environment that is friendly to both the children that attend the local school, those of us who live (and garden) in this neighbourhood are being ignored and/or shrouded in secrecy.

As a nurse I am well aware of the health hazards that any further changes to BWXT could have on our families and community life. Our property values will continue to decline, our food that we grow will increase in contamination, our children's health, already in peril from other environmental factors, does not need any additional contamination .

Yours in good faith

Kate Haines

Canadian Nuclear Safety Commission  
280 Slater Street,  
Ottawa ON  
K1P 5S9

Honourable Members;

I am writing to ask that the Canadian Nuclear Safety Commission show its commitment to transparency in the licensing of nuclear facilities by facilitating an open hearing for all aspects of the decommissioning of the Peterborough BWXT class I nuclear plant.

For the record, I believe that decommissioning hearings for Toronto and Peterborough should be held separately. The commission's Record of Decision granting BWXT its most recent license mandated two separate licenses for these facilities. Merging hearings is not in step with this mandate. I would like to know if this will be a pattern with other license holders? For example, will decommissioning hearings for Cigar Lake, Blind River and Port Hope be merged if it suits the needs of Cameco?

Regdoc 3.2.1 is quite clear in its directive; *"Through an effective public information program, a licensee or licence applicant establishes an atmosphere of openness, transparency and trust."* The CNSC must abide by the same principles that regulate its licensees. Regdoc 3.2.1 is built upon the premise that openness builds trust. The CNSC should set an example for its licensees by holding a fully transparent decommissioning hearing for this plant.

In addition to what the CNSC expects of its licensees, there are many reasons why this facility *in particular* should have an open hearing on decommissioning. Some of these are given below;

- This facility is in a densely populated area and only 25m from the junior playground of an elementary school. It is an international precedent to license a class I nuclear facility this close to a school. Similarly, residential accommodation is extremely close to this facility - under 20m from the GE/BWXT building to the doorstep of its nearest neighbour. Decommissioning will most certainly impact the neighbours of this facility and in particular, the vulnerable. The [CNSC itself recommends](#) optimization of protection strategies to reduce radiation doses to children. *"The development of credible radiological/nuclear event scenarios would assist in identifying probable sources of radioactivity and pathways of exposure for children. Such scenarios should then be used to identify protection strategies appropriate for children."* Yet, in [public filings](#) provided for this hearing neither BWXT or CNSC mention the proximity of this facility to a school or discuss pathways of exposure for the vulnerable. Parents and neighbours must know that they are protected in decommissioning. Risks associated with decommissioning must be transparent. Financial guarantees need to reflect the potential risks to children and neighbours.

- Contrary to Regdoc 3.2.1, and despite pledges in commission hearings, the licensee has NOT BEEN OPEN about its activities at the Peterborough site. For example, BWXT has not raised its decommissioning plans or its request to keep financial guarantees confidential. BWXT's most recent newsletters to the public are attached. The last minutes posted of the Community Liaison Committee were from meetings held in [October of 2022](#). Members of the Community Liaison Committee confirm that there were no discussions about decommissioning in the most recent meeting. Now would be a good time to hold BWXT accountable for its pledges and make discussion of financial guarantees public.
- This licensee is a lessor of its Peterborough facilities. As a lessor, BWXT is expected to return this site to GE-Hitachi. Responsibility for legacy contaminants is also to be passed back to GE-Hitachi. This presupposes that contamination around the plant is well characterized owing to its radioactivity. But non-radiological contaminants were deposited in activities related to this facility. For example, GE and GE/Hitachi claimed for years that PCBs found to the immediate west and uphill of this facility were sprayed on the lot as a [dust suppressant](#) for employee parking. This would be the parking lot used by GE nuclear, GE/Hitachi, and most recently BWXT employees. The public needs to know who is directly responsible for cleanup of this property. A confused muddle of responsibility between GE, GE nuclear, GE-Hitachi and BWXT is unacceptable. The public needs to know where responsibility truly lies. Documents provided by CNSC and BWXT do not provide insight as to how issues such as this will be handled in decommissioning. Secret proceedings and debate behind closed doors will not build the trust this community needs. Financial guarantees need to be clearly delineated and accountability must be clear to avoid legal obfuscation.
- Due to a history of [malfeasance](#) and [denial](#) there are [substantial issues](#) in trust with the operators of this facility - past and present. Closed hearings regarding financial guarantees will not help to build trust.

The pollution on this site is more complicated than is being maintained. Contrary to what has been stated by the licensee, some of this pollution is directly related to activities at the GE/GE-Hitachi/BWXT plant and is not well characterized. There is not enough information posted by CNSC staff and BWXT for the public to be informed about the risks associated with decommissioning. This facility is licensed only 25 metres from a public school and 15 metres from residential housing. Financial guarantees for decommissioning must reflect the risk and complexity associated with over 140 years of industrial use and the proximity to vulnerable populations. With an 80 acre legacy brownfield [currently diminishing social and economic possibilities](#) for neighbours of this facility, **Peterborough residents have every right to demand a transparent and open decommission hearing inclusive of financial guarantees.**

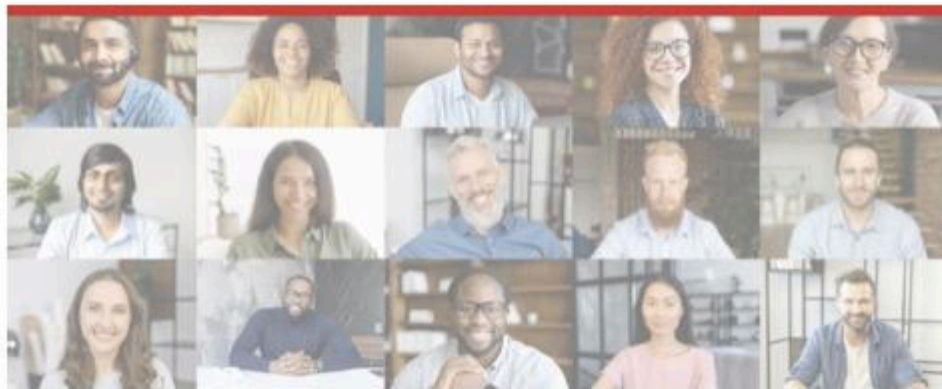
Sincerely,

Peter Harris

**From:** BWXT Nuclear Energy Canada [questions@bwxt.com](mailto:questions@bwxt.com)  
**Subject:** Your Community Update  
**Date:** November 15, 2023 at 4:16 PM  
**To:** [pharris40@cogeco.ca](mailto:pharris40@cogeco.ca)



BWXT Nuclear Energy Canada Inc. Peterborough News Update: November 2023



**Date:**  
**Time:**

Attend to learn more about BWXT's operations in Toronto and Peterborough, Ontario.

To register for this community event, visit our website at [www.nec.bwxt.com](http://www.nec.bwxt.com) or email us at [questions@bwxt.com](mailto:questions@bwxt.com).

### BWXT Visit to the Petroglyphs Provincial Park and Curve Lake First Nation





Earlier this fall, BWXT employees participated in a cultural visit to the sacred grounds at Petroglyphs Provincial Park and Curve Lake First Nation. The visit offered BWXT employees the opportunity to learn more about the historical significance of the Petroglyphs from Elder Lorenzo Whetung and from Eliza Brayden-Taylor (Curve Lake Cultural Centre).

While there, some turtle eggs were found in the rock crevices. Amazingly, one of the eggs was still able to be hatched so much later in the season. The baby turtle was set free to live out its life at a nearby wetland (a safer environment) at the Petroglyphs.



Photo credit: Curve Lake First Nation, 2022

Learn more about Curve Lake First Nation at [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)

**Want to learn about what we do at BWXT?**

Join our Community Liaison Committee



Community Liaison Committee



*Be a voice for your community!*



### Join the BWXT Community Liaison Committee

The Community Liaison Committee (CLC) is a forum for exchanging information between BWXT and community members residing in proximity to our facilities in Toronto and Peterborough. Members can bring forward questions or concerns about BWXT operations and identify opportunities to improve BWXT community relations.

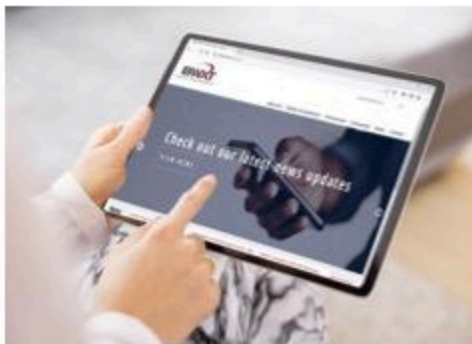
We are committed to learning more about the priorities and interests of the communities in which we operate. Please consider joining the CLC to help improve our community outreach, our communications about BWXT operations, and our health and safety initiatives.

### GET INVOLVED!

[Apply Here](#)

The deadline to apply is December 15, 2023. New members will be notified in early 2024

Do you have any questions? Please contact us via email at [questions@bwxt.com](mailto:questions@bwxt.com)



## Want to know more about BWXT?

[Visit our website](#)

If you have any questions or require additional information, please visit our [website](#) or contact me by phone at 705-536-3535 or via email at [creyes@bwxt.com](mailto:creyes@bwxt.com)

Kind regards,

Carlos Reyes  
Communications & Community Relations Specialist  
BWXT Nuclear Energy Canada Inc.



At BWXT NEC in Peterborough we assemble CANDU® fuel bundles using natural uranium dioxide ceramic pellets from our Toronto facility and zircaloy tubes from our Amprior facility. Both our Peterborough and Toronto facilities are licensed by Canada's nuclear regulator, the Canadian Nuclear Safety Commission (CNSC). BWXT NEC's fuel handling and reactor inspection and maintenance tooling and delivery systems, are also designed and manufactured in Peterborough. These highly-engineered systems and tools support refurbishment requirements for reactor defueling, fuel channel inspection and maintenance, and other reactor operating needs.

Approximately 400 people work at BWXT NEC in Peterborough in high-tech, manufacturing and administrative positions (180 are engineers in disciplines such as software, metallurgy, mechanical, electrical and systems). Our team produces the fuel to power 1 in 4 homes and businesses in Ontario with greenhouse gas emissions-free, affordable electricity!

**BWXT Nuclear Energy  
Canada, Inc.**

1160 Monaghan Road  
Peterborough, Ontario  
Phone: 1.855.696.9585 (toll-free)  
Email: [questions@bwxt.com](mailto:questions@bwxt.com)  
Website: [nec.bwxt.com](http://nec.bwxt.com)

Follow us on Social Media



BWXT Nuclear Energy Canada Inc. | 1160 Monaghan Road, Peterborough, K9J 0A8 Canada

[Unsubscribe \[unsubscribe\\\_pharris40@cogeco.ca\]\(mailto:unsubscribe\_pharris40@cogeco.ca\)](mailto:unsubscribe_pharris40@cogeco.ca)

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Sent by [questions@bwxt.com](mailto:questions@bwxt.com) powered by



**From:** [Faye More](#)

**Sent:** Wednesday, January 10, 2024 11:55 AM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#); [Interventions / Interventions \(CNSC/CCSN\)](#)

**Cc:** [Faye More](#)

**Subject:** (e-Doc 7201533) Re: PHCHCC Intervention: BWXT NEC Toronto and Peterborough  
Request for Confidentiality - RDP

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

January 10, 2024

To CNSC Commission Registrar: Please provide this email to the CNSC Chair and Commissioners submitted on behalf of the Port Hope Community Health Concerns Committee to be heard in this matter.

Dear CNSC Chair and Commissioners:

**Re: BWXT Toronto and Peterborough, Revised Preliminary Decommissioning Plan - Request for Confidentiality**

The Port Hope Community Health Concerns Committee objects to this request by BWXT to withhold information contained in its complete Revised Preliminary Decommissioning Plan 2023 for the locations in Toronto and Peterborough beyond that which is required by legislation to be confidential due to the following concerns:

1. The BWXT locations have been federally licensed for many years to operate despite having no buffer zones, located in the midst of communities, surrounded by homes, schools and businesses. Photos in BWXT documents illustrate its locations.

By virtue of its licensed locations for decades both BWXT and the CNSC have a duty of care to the people to be as transparent as possible regarding future decommissioning plans with ample opportunities for informed public involvement.

2. All information related to planned remediation, restoration and intended future state of the lands currently occupied and contaminated by BWXT are of strong concern to the people and others impacted directly by these plans including First Nations peoples as consultation is required by Canada's Policy for Radioactive Waste Management and Decommissioning 2023, and residents of any community planned to receive and store future radioactively contaminated materials.

3. As the information intended to be withheld by BWXT is not known it therefore cannot be itemized in this submission as requested. Instead we argue a necessary and general principle for full disclosure of the Revised Preliminary

Decommissioning Plan for maximum scrutiny and public comment on a matter of such significant public concern both local and beyond.

Such disclosure is consistent with and promised to the public by Canada's Policy for Radioactive Waste Management and Decommissioning 2023.

4. A detailed accounting of all steps and costs associated with the decommissioning including removing all radioactive contamination and restoration of the sites as well as the surrounding contaminated neighbourhoods is essential for transparency and accountability to the public of its operations, now and in the future. The extent of the current contamination issues is critical to be thoroughly understood, tabulated and included in costing and operational plans.

5. BWXT has provided no rationale to the public to support this sweeping request for confidentiality in such an important matter.

To act in the public interest, Commissioners should deny BWXT's request and make all relevant documents publicly available with ample opportunities for public participation and response.

Submitted by  
Faye More, Chair

on behalf of the Port Hope Community Health Concerns Committee

Canadian Nuclear Safety Commission

January 10, 2024

280 Slater Street,

Ottawa ON

K1P 5S9

Honourable Members –

I write to ask that the CNSC live up to its promise to Canadians and follow through on its [commitment to transparency](#) in the licensing of nuclear facilities. Specifically, the CNSC must ensure that there is an open hearing with regard to the estimated decommissioning costs at Peterborough's BWXT class I nuclear plant.

The BWXT site is leased from General Electric (GE), and part of a larger 21-acre brownfield site, a legacy of over a century of industrial activity. This site, which could be prime land for residential, commercial, or community development, has been mostly abandoned due to the costs associated with a cleanup. Neither GE, its subsidiaries or partners, nor any level of government, has been willing to provide the necessary funds to return the land to its natural state. Result? Toxic waste continues to plague our community, taking an emotional, psychological, and financial toll, while nothing is done.

It is within this context that BWXT now desires to withhold the estimated remediation costs for its nuclear facility from the public. The attempt at secrecy itself has lacked transparency: BWXT failed to notify the Community Liaison Committee, and notice of the request for confidentiality was sent out by the CNSC after the deadline for community feedback had passed. This betrays as questionable the oft-heard mantra that "this time it's different."

In my [written submission](#) with regard to BWXT's application for the renewal of the licences for the Peterborough and Toronto facilities, I specifically addressed the issue of financial guarantees for decommissioning. At that time, BWXT was seeking approval of the updated financial guarantee amounts for Peterborough at \$10,775,122, and Toronto at \$37,362,745 (in 2024 Canadian dollars).

For BWXT to require confidentiality during this review period, and not for the former, begs the question: what's changed? The answer is that Peterborough is now licensed to process fuel, which might, over time, result in a significant increase in remediation costs. Remediation estimates could also provide insight into the nature and extent of BWXT's plan to begin processing in Peterborough. This may be one reason for the desire for secrecy, which is clearly in BWXT's interest. But how is it in the public interest?

As well, I am concerned that as we are in a higher interest rate environment, with BWXT's Preliminary Decommissioning Plan (PDP) coming due this year, letters of credit, surety bonds, and other financial instruments will place an increased financial burden on the company. Again, secrecy here serves BWXT's interests, and not those of the community.

It should be noted that in a [public hearing on March 2, 2020](#), John R. MacQuarrie, president of BWXT's Commercial Operations, acknowledged that decommissioning was an area of public concern. He stated: "We are committed to timely, transparent engagement in our communities." Clearly, this new attempt

at secrecy is out of step with Mr. MacQuarrie's public statements, and can only erode public trust in both BWXT and the regulator.

As I'm sure you are aware, BWXT's Peterborough site is unique in that it is in a residential neighbourhood – 15 meters from the nearest home, and only 25 meters from an elementary school. These facts are well-known, and make transparency with regard to remediation guarantees all the more important.

To conclude, CNSC's mandate is to "protect health, safety, security and the environment." It is not to protect the shareholders of BWXT. Please fulfil your promise of transparency, and hold BWXT to the standards expected of any good corporate citizen. The people of Peterborough deserve nothing less.

Kind regards,

Timothy Wilson  
West Peterborough, ON

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**From:** miriam liba  
**Sent:** January 10, 2024 4:44 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Greetings,

As a concerned citizen, I ask that you Please DO NOT grant confidentiality to BWXT Peterborough in their decommissioning planning.

**What is there to hide?**

Thank you for your thoughtful and considered work in this matter. It is appreciated.

Miriam Liba

Peterborough, ON

---

**From:** Virginia Walley  
**Sent:** January 10, 2024 5:23 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** BWXT Peterborough decommissioning plan - I say NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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BWXT Peterborough decommissioning plan - I say NO to confidentiality.

Virginia Walley

Peterborough, ON



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**From:** Zach Ruitter  
**Sent:** January 10, 2024 5:33 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** Objection

---

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Hello Louise

Please accept this email as an objection to the confidentiality of 1. BWXT NEC Toronto and Peterborough Preliminary Decommissioning Plan 2023

Re: **BWXT NEC Toronto and Peterborough – Revised Financial Guarantees**

In the past the polluter, known then as General Electric Hitachi, has claimed information is proprietary and confidential when it was damaging to them, and were keeping the information secret when it was not in the public interest to do so.

In the interests of transparency, the information should be made public and the public should have input, is the CNSC considering the public interest or protecting the proponent from the public interest in considering the request for confidentiality?

Zachary Ruitter

## **Objections to the request for confidentiality by BWXT**

To Whom It May Concern,

I am writing today to raise my concerns about BWXT's request for the upcoming hearing on their decommissioning plans to be held confidentially.

I was particularly surprised and disappointed to hear of this request since at the CNSC hearing in 2020 BWXT heard from many local citizens that they needed more consultation and more transparency from the company.

At that time BWXT agreed to consult with the public more, and to be more transparent about business decisions that affect all citizens in Peterborough and the surrounding areas.

Asking for the upcoming hearing to be confidential seems to effectively undermine any confidence the public may have had that BWXT is working with our well-being in mind.

The request for confidentiality brings to mind important questions like:

What does BWXT have to hide?

What choices are they making that may not be in Peterborough's best interest?

Why are we not being properly informed when it is Peterborough's citizens who will have to live with the consequences of decommissioning done improperly, or on an insufficient budget?

Will BWXT's decommissioning plan cause Peterborough real-estate to decline in value?

Will those attending the school across the street from BWXT have harmful repercussions from decisions made by BWXT behind closed doors?

I am asking that BWXT's decommissioning plan be an open process with all information available to the public.

I am asking the CNSC to refuse BWXT's request for their decommissioning hearing to be confidential from the public.

I am asking the CNSC to make available all relevant documents to the public concerning BWXT's present decommissioning plans and any changes to that plan.

Sincerely,

Corinne Mintz

**From:** Pete Woolidge

**Sent:** Wednesday, January 10, 2024 7:46 PM

**To:** Interventions / Interventions (CNSC/CCSN)

**Subject:** (e-Doc 7201543) Objection to BWXT's Request for Confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Commissioners,

BWXT's request for confidentiality of their Preliminary Decommissioning Plan revision (December 19, 2023) was posted one day after the deadline for community feedback. This is blatant dirty pool and it raises a red flag concerning a lack of transparency. The decommissioning of a brownfield facility in the heart of a residential district and so near to a functioning school should be a very transparent process and transparency was mandated to BWXT by the CNSC.

I am requesting that the updated Preliminary Decommissioning Plan revision not be confidential.

Sincerely,  
Pete Woolidge

Sent from my iPad

**From:** [Kristine Williams](#)

**Sent:** Wednesday, January 10, 2024 10:14 PM

**To:** [Interventions / Interventions \(CNSC/CCSN\)](#); [Bodhi](#)

**Subject:** (e-Doc 7201549) BWXT Peterborough request

---

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hello,

We hope it is not too late to request transparency from BWXT regarding its request for confidentiality in decommissioning activities. Please add our names to the list of local citizens who object to the secrecy around this company's activities in our neighbourhood.

Sincerely,  
Kristine Williams (parent)

# NORTHWATCH

January 10, 2024

Commission Registrar  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

Ref 2024-H-103

Re. BWXT NEC Toronto and Peterborough Request for Confidentiality  
Preliminary Decommissioning Plans and Financial Guarantees

On January 3, 2024 the Canadian Nuclear Safety Commission announced an extension to the deadline for objections to the request for confidentiality made by BWXT with respect to the Preliminary Decommissioning Plans and Financial Guarantees for its Toronto and Peterborough facilities. The revised notice indicated that objections were now due by January 10, 2024, seven days later.

On the same day, the Commission issued a revised notice that it will conduct a hearing based on written submissions to consider a request from BWXT Nuclear Energy Canada Inc. (BWXT NEC) for the acceptance of the revised financial guarantees for its facilities in Toronto and Peterborough, Ontario. The revised notice of hearing in writing announced an extension to the deadline for interventions to February 5, 2024.

BWXT NEC is currently licensed to operate both facilities. As per its licences, BWXT NEC is required to maintain decommissioning plans and financial guarantees, which ensure funding for future decommissioning costs. BWXT NEC is also required to revise its preliminary decommission plans and financial guarantees every 5 years. BWXT NEC currently funds its financial guarantees using a combination of an irrevocable letter of credit and surety bond for each facility.

Northwatch has reviewed the summaries BWXT has posted on its web site of the preliminary decommissioning plans for these two facilities and finds them inadequate for the purpose of the public preparing comments on the revised Preliminary Decommissioning Plans and Financial Guarantees for BWXT's Toronto and Peterborough facilities.

## Objections to the BWXT Request for Confidentiality

Northwatch objects to Preliminary Decommissioning Plans being deemed confidential document for the following reasons:

- The summaries BWXT has posted on its web site of the preliminary decommissioning plans for these two facilities are inadequate for the purpose of the public preparing comments on the revised Preliminary Decommissioning Plans and Financial Guarantees for BWXT's Toronto and Peterborough facilities and provide insufficient information



- The summaries BWXT has posted on its web site of the preliminary decommissioning plans for these two facilities provide inadequate information; for example, the summary for Peterborough indicates that the strategy “entails the removal of all contaminated equipment for disposal and remediating the site and structures of uranium/beryllium contamination” but does not identify the location or facility to which contaminated equipment or materials will be removed to, the methods for characterizing on-site materials to identify methods of remediation or removal, or the methods for characterizing on-site soils and structures and what thresholds of contamination will be applied
- The summaries BWXT has posted on its web site of the preliminary decommissioning plans for these two facilities provide inadequate information; for example, the summary for the Toronto facility indicates that the strategy “the removal of all contaminated equipment for disposal and remediating the site and structures of uranium contamination.” but does not identify the location or facility to which contaminated equipment or materials will be removed to, the methods for characterizing on-site materials to identify methods of remediation or removal, or the methods for characterizing on-site soils and structures and what thresholds of contamination will be applied
- The summaries BWXT has posted on its web site of the preliminary decommissioning plans for these two facilities provide inadequate information; for example, there is no information provided to support the amounts proposed for the financial guarantees proposed for each of these facilities (The total cost for decommissioning the site is estimated to be \$20,429,189 in 2027 Canadian dollars for the Toronto facility and \$10,069,695 in 2027 Canadian dollars for the Peterborough facility); these estimates lack credibility, and the absence of any supporting information does not allow public review of this important aspect of the decommissioning planning process
- The Toronto and Peterborough facilities have been in operation since 1955 under various owners and as such is the scene of almost seventy years of nuclear operations
- The decommissioning and cleanup of these sites after closure is a matter of public interest
- BWXT is proposing that public access be limited to a summary of the Preliminary Decommissioning Plan which does not provide adequate information about the proposed approach to decommissioning or to the proposed dispositioning of the decommissioning wastes
- The information that should be made available to the public includes but is not limited to:
  - o A full and detailed inventory of the anticipated decommissioning wastes, including a full characterization of the wastes and any radioactive, toxic, combustible and flammable qualities of the waste
  - o A full and detailed estimate of the waste volumes, by category and characteristic
  - o A detailed description of the proposed waste management facility which BWXT has identified as the end point for the decommissioning wastes
  - o Any other information which BWXT has included in its most current preliminary decommissioning plan and financial guarantee

Northwatch has previously commented on a similar request from Cameco to keep confidential the preliminary decommissioning plan for their Porth Hope Conversion Facility. While Northwatch has a direct interest in the outcome of that review given Cameco’s intent to use the North Shore of Lake Huron as a radioactive waste disposal site for their Port Hope decommissioning waste, we are providing comments on the BWXT request for confidentiality because this is a matter of public interest, and we

are concerned about how the CNSC decision on the BWXT request for confidentiality could be precedent setting or become normative in the CNSC practice.

For these reasons and those that may have been brought forward by others with an interest in this matter, Northwatch submits that the Canadian Nuclear Safety Commission must direct BWXT to make the preliminary decommissioning plan for the Toronto and Peterborough facilities available to those who have an interest in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Lloyd', is positioned above the typed name.

Brennain Lloyd  
Project Coordinator, Northwatch

**From:** Zahir Topan  
**Sent:** Thursday, January 11, 2024 9:19 AM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Subject:** (e-Doc 7201560) No to BWXT Confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hi

I just want to ensure BWXT is not given confidentiality in its operations, because it is dealing with highly toxic substances and is located near sensitive public areas such as schools and housing.

Thank you.  
Zahir Topan





**From:** [Sue Sauve](#)  
**Sent:** Thursday, January 11, 2024 7:10 PM  
**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)  
**Subject:** (e-Doc 7202907) BWXT Peterborough decommissioning plan - I say  
NO to confidentiality.

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

I feel very strongly that a transparent process is required in this process. The close proximity of this facility that deals with nuclear products to neighbourhoods and schools is likely unprecedented in Canada. I urge you to require that information be public and that all aspects of the process are transparent.

Sincerely,

Sue Sauve  
Peterborough, Ontario

---

**From:** Jane Scott  
**Sent:** December 19, 2023 3:11 PM  
**To:** Interventions / Interventions (CNSC/CCSN)  
**Cc:** Citizens Against Radioactive Neighbourhoods  
**Subject:** BWXT's notice of Request for Confidentiality

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EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

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Dear Sir or Madam,

CARN was shocked to see that we were not notified of BWXT's Notice of Request for Confidentiality, despite our obvious interest in the matter.

Instead I found it buried in a personal email today and see that the deadline for objections to BWXT's request for secrecy was yesterday!

We demand an extension to object to BWXT's request for confidentiality, which is clearly not in the public's interest. There is a primary school right next to this factory, which is located in a downtown residential area. We especially owe it to the children to have transparency about the activities, present or anticipated, of this Nuclear Facility.

The public has a right to know.

We hope this was just an oversight on the behalf of the Commission.

We also request hearing documents for the hearing on BWXT Nuclear Energy Canada Inc. 's(BWXT NEC) revised financial guarantees for its facilities in [Toronto](#) and [Peterborough](#), Ontario.

Please make sure that important mail goes to our CARN gmail account as well.

Sincerely,

Jane Scott, on behalf of CARN—Citizens Against Radioactive Neighbourhoods.