



**Written submission from
Jane Scott**

**Mémoire de
Jane Scott**

In the Matter of

À l'égard de

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

February 2024

Février 2024

Dear Commissioners,

First, a reminder that BWXT's building 21, which contains the uranium fuel fabrication, is in a downtown residential area, right next to the sidewalk and 25 m from a primary school. (BWXT is also licensed to repair contaminated (radioactive) equipment in another building nearby.)

The CNSC recently granted BWXT in Peterborough "the flexibility" to process uranium pellets from powder despite the only biological specialist on the commission's panel, Dr. Demeter, wanting to deny this permission. He didn't think "the potential inequitable increased exposure to the vulnerable population given the proximity of Prince of Wales Public School" was justifiable. He wanted to be sure to protect the children.

In granting BWXT "the flexibility" to process uranium pellets, the CNSC would not take into account the history of the contamination of this site....Beryllium, uranium, which is a radioactive heavy metal, (and its radioactive daughters), and lead, PCBs, TCEs, to name a few). Unfortunately, the toxicity of this land after over 100 years of industrial activity cannot be ignored when it comes to decommissioning.

Dangerous toxic dust may be raised from decommissioning BWXT and will have to be carefully managed. Children play and live right next door. It's going to have to be carefully planned out and will likely be very expensive.

Yet, despite high inflation, BWXT estimates the decommissioning costs of its Toronto and Peterborough facilities to be 37% lower than their 2019 estimates! (They want to reduce their financial guarantees from \$48.1 million to \$30.5 million.) BWXT wants the proposed financial guarantees to be reduced to reflect this despite 3.25 % inflation each year! So basically in real world terms BWXT is looking to half its decommissioning financial guarantees when taking inflation into account! It already seemed woefully inadequate before.

In Peterborough, BWXT hopes the first \$516,904 of this would be satisfied by a letter of credit....That is crazy low! This should be going up, definitely not down, to ensure that the population is going to be adequately protected.

Which begs the question, what corners are being cut here? What damages are being considered as externalities—children's health? —the health of our water? The workers? The health of land in other jurisdictions?

Is Peterborough's sanitary water system even up to handling all the waste water after washing contaminated equipment and buildings? If it isn't, who will pay for a better system? The municipality? (If pelleting in Peterborough compounds this toxic mess even further, financial guarantees should be going up, not down. Peter Mason, former bigwig at GE-H ,said that pelleting in Peterborough would never be allowed because our sewage system was not capable of handling it.) How will BWXT ensure that contaminated water doesn't end up in the storm sewers and Little Lake?

I was surprised that the CNSC staff did not consider such a large decrease in financial guarantees to be of interest to indigenous shareholders. Duty to consult should have been triggered in relation to this request.

Citizens in both Toronto and Peterborough deserve to know what is happening next door. So much for transparency!

Sincerely,
Jane Scott

Peterborough
Ontario