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Exposé oral

**Written submission from
Kathryn Campbell**

**Mémoire de
Kathryn Campbell**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

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Summary Statement

Opening Statement

I am opposed to expanding the BWXT license to allow them to manufacture uranium dioxide pellets (hereafter referred to as pelleting) on the GE-Hitachi property, Monaghan Road, Peterborough Ontario and urge the CNSC to remove pelleting in Peterborough from the BWXT License Renewal Application.

I have read, with great care, all of the documents submitted by the CNSC and BWXT in support of the Renewal of License FFO-3620.01/2020. I have also read several years of BWXT Compliance Reports. I have done additional research on the subject. During thirty-nine years of teaching Business Administration at the post-secondary level (2 years at Sir Sandford Fleming College and 37 years at Trent University, Business Administration Program/School of Business), I have ploughed through a lot of corporate documents and, in this case, I have come to the following conclusion. **BWXT has failed in its stated commitment to “[connect] with the communities in which it operates in a timely, transparent and meaningful way”** (p.37, Renewal of Operating License FFO-3620.1/2020, hereafter referenced as “Renewal”). Their communications have not been timely; their communications have not been transparent; their communications have not been meaningful.

In this submission I will draw attention to just a few of the instances in which BWXT, through poor, manipulative and even false communication, has failed *“to build and sustain public trust”* (Renewal, p.47). Cumulatively, these **acts of purposeful misinformation paint a picture of corporate indifference and willful attempts to deceive.**

Peterborough has already suffered deeply from industrial contamination by GE-Hitachi. GE-Hitachi said trust us, then they failed us. They failed to protect their own workers, and by extension, they failed the families of the hundreds of GE workers who died from nuclear and non-nuclear contamination in the workplace. Under cover of a license transfer from GE-Hitachi, BWXT was grandfathered onto the GE-Hitachi site. No public disclosure there. Now we are confronted, once again, with a large, multinational corporation, just like GE, that says “trust us”. Trust has to be earned and, in their three years in Peterborough, **BWXT has done nothing to earn the trust of the citizens of Peterborough.**

SECTION I: Communicating with Stakeholders

I.i My Status as a Stakeholder

I live at 591 Bolivar Street, Peterborough, three blocks north of the GE-Hitachi property and the current site of BWXT NEC. I can see Prince of Wales Public School from my kitchen window and the GE stack from an upstairs window. I have lived here since 1973 (almost 47 years). Both of my children were born and raised in Peterborough and attended Prince of Wales Public School (POW) for all nine years of their elementary education. They were enrolled in the French Immersion Program there and both are now bilingual. They received a fine elementary education at POW and both are now quite successful in their respective fields (IT at Heathrow Airport, London, England and banking, TD

Head Office Toronto). My husband was, until retirement, a public school teacher and worked at Prince of Wales for 5 years. This is a vibrant and increasingly sought-after neighbourhood where modest family dwellings and fine heritage Victorian homes live harmoniously side-by-side. As will be discussed later, a large section of homes immediately north of the BWXT factory has recently been recognized as a Heritage Conservation District.

I have additional grounds to claim stakeholder status in matters pertaining to activities on the GE-Hitachi property. My father worked at the GE factory on Monaghan Road for 25 years. He died of cancer in 1985. GE did not protect him from the hazards of his workplace.

I.ii Who does BWXT recognize as a stakeholder?

In days of old, corporations chose when and how they would communicate with self-selected communities of interest. Most often they chose not to speak at all. Today, corporate stakeholder theory says that any person can declare themselves to be a stakeholder by virtue of a personal interest in the activities of a particular corporation and that the corporation has a social responsibility to engage with all stakeholders. Such an open definition troubles some corporations and it clearly makes BWXT President Mr. MacQuarrie uncomfortable. In his December 2019 *Examiner* article, he says that he wants to communicate with “*all of our stakeholders...especially our community neighbours*” but he is clearly unhappy with “*some individuals in our communities [who] have misrepresented the impact of our operations to the public*”. While he mouths the word ‘stakeholders’, Mr. MacQuarrie dismisses their concerns as “*misrepresentations*”. **Anyone who disagrees with him is not treated as a stakeholder.**

A possible insight into BWXT’s determination of stakeholder status is the mailing list of the Community Newsletter. BWXT Peterborough sent out approximately 1,500 newsletters in 2016 and approximately 3,700 in 2019 (BWXT Renewal of Operating License FFOL-3620. 1/2020, p. 53, hereafter referenced as Renewal). In 2019, with a license renewal in the offing, their “target audience” (Renewal, p.55) miraculously more than doubled. We were there all along but suddenly they noticed/needed us. But now we are a “target”, not a legitimate partner with whom they wish to dialogue. They boast that “their stakeholder contact list grew significantly” (Renewal, p.52) but **a public mailing of just 3,700 newsletters grossly underestimates the Peterborough stakeholder community of interest.**

I.iii Some stakeholders are more equal than others

Communicating with the Toronto stakeholder community apparently has been of higher priority than talking to Peterborough folks. In Toronto, a Community Liaison Committee was formed in 2013. Seven years later, **they are finally getting around to establishing a CLC in Peterborough but it will not happen until sometime in 2020** (Renewal, pp.53-54).

I.iv The IEMP provides a crisp definition of BWXT stakeholders

Using the IEMP monitoring data (pages 34 & 35, Environmental Protection Review Report, December 2, 2019, hereafter referred to as the EPRR) a clear community of interest is delineated. In 2019, the IEMP conducted soil tests in Peterborough. These tests extended out from the Monaghan Road plant

in a rough radius of 2.0km (the same distance as IEMP soil samples around the BWXT Toronto factory). Assuming that the IEMP was not aimlessly digging around, 2.0km is the area within which the IEMP has reason to believe that emissions of uranium dioxide powder might be disbursed. **Everyone within this 2.0km radius has legitimate claim to the status of BWXT stakeholder.**

The 2.0km radius is known colloquially, in Peterborough, as **The ZONE**. My amateur rendition of The ZONE is attached (Appendix A). For the Intervention hearing, I have a professionally scaled, 36 inch by 48 inch, GIS map of The ZONE. **In The ZONE are 11,871 properties. Preliminary, conservative estimates of full-time BWXT stakeholders (residents and workers in The ZONE) stand at more than 25,000.** More detailed calculations will be completed by the March 5-6 Intervention. Calculating the number of **transient BWXT stakeholders (people moving through The Zone)** would require considerable effort but their stakeholder rights need to be recognized and then surveyed. At best, the BWXT newsletter is going out to less than 20% of IEMP defined stakeholders.

I.v Accurate and Inaccurate descriptions of the factory location

The CSNC “License Renewal” Document (CMD 20-H2, p.3) briefly describes the “Peterborough Facility Location” in the following manner, **“The Peterborough facility is located in central Peterborough on Monaghan Road, surrounded by residential buildings and a public school** as shown in Figure 2 (CMD 20-H2, p.3). Figure 2 is an eastward-facing, aerial view that captures the north, west and south boundaries of the factory site, and clearly shows the tree-lined streets that are characteristic of the area. The EPRR description is comparable to that given by the CNSC, namely **“The industrial site is located in the centre of Peterborough and is surrounded by residential buildings and a public school”** (EPRR, p.6). The aerial view included in the ERPR is oriented towards the north-east and, as with the CNSC photo, clearly shows tree-lined residential streets immediately adjacent to the factory. A full, birds-eye view would have shown trees on all four sides of the factory property. Both the CNSC and EPR descriptions and photos accurately portray the factory location.

The BWXT description is dramatically different. **Entirely inaccurately, BWXT describes the factory location as follows, “The Peterborough facility is located in a mixed industrial, commercial and residential area in west-central Peterborough”** (Renewal, p.6). The BWXT photo distorts the dimensions of the building and its position on the property. The image is cropped on three sides to focus on three features: the building, Monaghan Road on the north-south boundary and a parking area to the south of the building. **The assertion that the area is “a mixed industrial, commercial and residential area” is patently incorrect and is either an intentional misrepresentation or very poor research.**

The BWXT factory is one of only three factories remaining in the area. The other two are quite small and pose no health risks to the neighbours. **Prince of Wales Public School, directly across Monaghan Road, is not included in the BWXT description and has been cropped out of the photo.** [Prince of Wales Public School, built in 1917, is one of Peterborough’s largest public elementary school with 600 students.] BWXT’s attempts to **verbally and visually distort the character of the neighbourhood** were ultimately thwarted by the grandeur of the landscape itself.

The upper (northern) portion of their photo clearly shows the mature canopy of trees that stretches off to the horizon.

I.vi The ZONE

As already mentioned, there are 11,871 properties and more than 25,000 residents within the IEMP 2.0km radius of the BWXT factory. The population of Peterborough is 81,000. The ZONE is home to at least 30.8% of Peterborough's population. None of the above descriptions recognize the **social, educational, sports and institutional stakeholders within The ZONE**. A representative, but not exhaustive, list of the stakeholder occupants in The ZONE includes:

- **8 elementary schools with a total population of 2,650 students** (Prince of Wales, Queen Mary, Westmount, Keith Wightman, St. Alphonsus, St. Teresa, St. John, and Immaculate Conception)
- **2 secondary schools with a total population of 1,600 students** (Kenner and St. Peter's)
- Catharine Parr Traill College (a residential and teaching college, affiliated with Trent University)
- **7 retirement residences with an approximate population of 600 persons** (Applewood, Empress Gardens, Princess Gardens, Royal Gardens, Rubidge Hall, St. Giles' Seniors, St. John's)
- Peterborough Regional Health Centre (the only hospital in Peterborough and the hospital for the surrounding region)
- Peterborough Marina
- Del Cray Park, site of Musicfest (a program of summer-long outdoor music concerts)
- Little Lake (swimming, fishing, boating)
- 28 places of worship
- 2 heritage cemeteries (Little Lake and St. Peter's)
- 38 municipal parks
- Jackson's Creek
- 5 major Arts & Cultural facilities (Showplace, Hutchinson House, Canadian Canoe Museum, Peterborough Art Gallery, Market Hall)
- A great many outdoor sports facilities: baseball, soccer fields, children's water parks, Prince of Wales toboggan hill, basketball court, skateboard park, tennis complexes, eastern ¼ of Kawartha Golf & Country Club
- All of downtown Peterborough
- Lansdowne Place and numerous smaller malls
- Government buildings: City Hall, MNR, Courthouse, Police Station
- Etc.

I.vii The Avenues and Neighbourhood Heritage Conservation District

The Avenues and Neighbourhood Heritage Conservation District is located two blocks north of the BWXT factory. In 2016, after extensive community consultation, the City of Peterborough awarded this designation to the area, in order to protect and preserve its unique architectural features. The Avenues and Neighbourhood Heritage Conservation District is,

“an early 20th century residential suburb in Peterborough’s old west end. Since the area was surveyed in 1825, it has evolved from a series of park lots on the outskirts of town to an established residential neighbourhood, characterized by the visual coherence of the historic houses on tree-lined streets.”

The district is bounded by Charlotte Street to the north, Park Street North to the east, Bolivar Street to the south and Monaghan Road to the west. There are some 354 homes within this Heritage Conservation District. An HCD designation recognizes that the area has a strong and coherent community identity that fosters stability and enhancement of property values. Ever since the news that uranium dioxide pellets might be manufactured just down the road, homeowners have been expressing considerable concerns about their health in the future. Gardeners are now questioning the safety of their vegetable gardens. Three years ago, the HCD was recognized as an attractive and valued neighbourhood. If pelleting is approved, property values in the District are going to plummet.

SECTION II: The Nature and Efficacy of BWXT Communications

As a longtime resident of the community in question, **I have received nothing from BWXT other than one glossy newsletter** this fall. If more were ‘mailed’ I did not receive mine. My one newsletter did not contain any of the information promised by BWXT, namely “*information concerning anticipated effects on the environment, health and safety of persons that may result from the activity*” (Renewal, p.47). I had no idea who John MacQuarrie was until December 2019 when he wrote a guest column in our local newspaper and made the following statement,

“Transparent and accurate communication to all of our stakeholders about our business, especially our community neighbours, is important to BWXT Nuclear Canada (BWXT).” (*Peterborough Examiner*, December 14, 2019)

His article was not part of a planned or ongoing engagement with the community. Rather, it was a one-off, reactive and defensive response to public commentary which he disparagingly labeled as “*misrepresentations*”.

Effective communication brings two or more parties together to talk and listen with respect to each other. Effective communication is ongoing, not when it is convenient for just one side. Effective communication is very difficult when there is a serious power imbalance. BWXT does not communicate with the stakeholders in Peterborough. BWXT sends us communiqués and their **communiqués are glossy, infrequent, misleading and of limited distribution.**

II.i Aggrandizing & Minimization are both deceptive communication strategies

Establishing the exact date when BWXT took over operations from GE-Hitachi should be a simple and straightforward task. It is a fact that they purchased the license in December 2016 but there are reports of activities that predate 2016. For example, the Toronto Community Liaison Committee was established some time in 2013 (Renewal, p.53). But it really stretches credibility when, three pages later, we are told that “**BWXT NEC has been operating safely in Peterborough for over 50 years**” (Renewal, p.56). It certainly seems like they are **trying to pad their resumé**. In the above mentioned

December 2019 *Examiner* article Mr, MacQuarrie attempted to **aggrandize their safety record** in a similar manner, saying that “This application covers our Peterborough and Toronto sites – sites that have operated safely for over five decades.”

And, even if that were true, how does BWXT reconcile 50 years of “safe” operations with the work-related deaths by cancer of 44 Peterborough nuclear workers during the period 1977-2004? This information has been compiled by Jim Dufresne, a long-time advocate for worker safety at the GE factory. He is submitting an Intervention that will provide evidence confirming these deaths. The widows and widowers of all those workers, who were bringing home pay cheques from GE, would be very interested to know that BWXT was responsible for the “safe operations” at the factory when their loved ones became sick.

Students do not get to rewrite their report cards but apparently BWXT can **rewrite their performance reports**. The CNSC (CMD 20-H2, p.11) states that BWXT’s rating on 14 Safety and Control Areas is “satisfactory”. But, twice in their application documentation, BWXT changed the wording of their evaluation, boasting about their “strong performance” (Renewal, pp. 4 & 10). “Strong” is not a rating category. The categories are: Fully Satisfactory, Satisfactory, Below Expectations, and Unacceptable. For all 14 Safety and Control Areas BWXT received nothing higher than a rating of satisfactory. None of the ratings were fully satisfactory. As a long-time teacher, I think in teaching terms. Fully Satisfactory would be an “A” student; Satisfactory would be a B/B- student who could work harder. With BWXT literally in my backyard, I want them to be “A” performers. And I want them to be honest students who do not lie about their report card.

At the other end of the continuum, **President McQuarrie is very fond of minimization as a communication tactic**. In a January 2020 Global-CHEX television interview, Mr. MacQuarrie described the expected uranium dioxide emissions from pelleting as “not a lot of material”, “a very small amount” and “very, very small”. The average reader might be misled into believing that the total volume of uranium dioxide emissions of some 6.3 gms per year (the amount currently emitted at BWXT Toronto) is a “small amount” but (and this is giant but) Mr. MacQuarrie neglected to tell us, his stakeholders, that each gram of uranium powder contains 3.8 trillion particles and that just one particle, inhaled into the lungs, can cause life-threatening health problems. He also neglected to acknowledge that the emissions are composed of uranium dioxide, a radioactive heavy metal with a half-life of thousands of years. Long after BWXT has moved on, the soil around their factory will be contaminated.

In fact, **we need to worry about these emissions precisely because they are small**, tiny particles about 0.3 microns wide, smaller than a human hair, tiny particles so small that they become airborne when emitted from the factory, tiny particles so small that we, the stakeholders living and working in The ZONE, could unknowingly inhale a particle into our lungs. The World Health Organization says that once inside the body, alpha particle emitters, such as uranium, are type 1 carcinogens. Inhaling just one “very, very small” particle could have serious health outcomes. In this instance, **“very, very small” can be deadly**. Mr. MacQuarrie did not mention any of these facts.

The quality of communications is judged by what is said and how it is said. An assessment of **what is not said is also important**. Official BWXT communicators (Mr. MacQuarrie and spokesperson

Natalie Cutler) and official BWXT communications frequently neglect crucial information. In the Roman Catholic Church, these are known as “sins of omission”.

II.ii “Flexibility” for the future or Application to commence pelleting ASAP?

The official BWXT posture is that the application to manufacture pellets in Peterborough is just intended to give them “flexibility” should there be changes in the market in the future. The statements compiled below do not provide Peterborough stakeholders with clear, coherent or plausible explanations about BWXT’s pelleting plans. Will pelleting be conducted at both factories? When might pelleting begin in Peterborough? Will the citizens of Peterborough receive timely notification prior to start-up? How might they expect to be informed? Will the Toronto pelleting operation be decommissioned and all pelleting done in Peterborough? All of these possible scenarios have been alluded to in various communications from BWXT. I have included all the statements that I could find to show that there is a clear pattern here. **Either BWXT does not know what they are doing, or they are engaging in planned communication campaign to issue ambiguous and contradictory information.**

The following statements fall well below any reasonable standard of transparent communication. The matter under discussion is of vital concern to BWXT Peterborough stakeholders. BWXT is not fulfilling its responsibilities as a licensee of a Class 1 Nuclear Facility to be proactive in their communications with Peterborough stakeholders.

- At a September 2019 information session in Peterborough, a BWXT official told a resident of Bolivar Street that the company **planned on consolidating their Toronto operations with Peterborough** because they anticipated a decline in business after Pickering Nuclear’s scheduled closure in 2024. Sadly she is not an experienced spy and she did not think to get a recording of this disclosure. I am sure that BWXT will deny this given their subsequent statements that they “have no plans...”
- “The BWXT facility in Toronto creates uranium pellets...The company says it’s not looking to change that. Licenses last for 10 years to the company wants ‘**flexibility to adapt should we need to,**’ Cutler said. ‘There is **currently no plan to change our operations.** It was a request in our application should the need arise in that lengthy period of time’ she added. Cutler said she can’t speculate on what kinds of industry changes would cause BWXT to bring pelleting to Peterborough.” (Natalie Cutler, BWXT spokesperson, Examiner, 9 December 2019)
- “In our application, we have **requested the option** to make natural uranium pellets **at our Peterborough site, as well as our Toronto site,** should the need arise over the 10-year license period” (John MacQuarrie, Examiner, 14 December 2019)
- “BWXT NEC is seeking the additional **flexibility** during the proposed next license period to produce pellets **at both facilities.**...While there has been **no formal business decision** to produce pellets at the Peterborough facility, BWXT NEC has requested License Conditions and associated License Handbook (LCH) compliance verification criteria to permit such activities during the proposed next license period...although BWXT NEC has applied for the **flexibility** to produce pellets **at either of its two licensed locations,** there are no business plans to manufacture pellets in Peterborough at this time.” (20 December 2019, Renewal, p.9 & 10)
- **Future Plans**

“BWXT NEC is seeking the additional **flexibility** during the proposed next license period to conduct pelleting operations at the Peterborough facility. Hence, a **revised ERA** has been completed for the Peterborough facility which identifies potential health and ecological risks associated with the **consolidation of the BWXT NEC fuel pelleting operation in Toronto with the existing BWXT NEC fuel assembly operations in Peterborough.**” (20 December, 2019, Renewal, p.40)

- **BWXT Website**

“BWXT NEC is seeking the flexibility during the proposed next 10-year license period to permit BWXT NEC to **produce natural uranium pellets at both the Peterborough and Toronto facilities.** While there is **currently no plan to change the existing state of operations**, including the flexibility to allow BWXT NEC’s Peterborough facility to conduct pelleting will help to ensure that BWXT NEC has the ability to adapt as needed to changing business needs over the decade-long license period.”

- On January 6, 2020, Mr. MacQuarrie said, in a television interview, that BWXT is “**not planning to do any pellet manufacture in Peterborough at the moment and, if conditions change in the market, the license will give us the flexibility to do that.**” (Global-CHEX, 6 January 2020)

II.iii All this talk about “business plans” in the future is a smokescreen

The License Conditions Handbook and the Change Management Process set out all the requirements that BWXT has to follow in order to commence pelleting in Peterborough. “The License Conditions Handbook (LCH)...allows BWXT to make incremental changes, update its documentation, and **implement the conduct of pelleting operations in a phased manner, as requested in its application**” (CNSC CMD 20-H2, pp7-8). “The Change Management process includes a conditional release step allowing the commissioning to proceed subject to the outstanding requirements noted on the Change Notice Form, which subsequently must be satisfactorily addressed before final approval is granted for the project following any commissioning” (Renewal, p.18). License Condition 15.2 explains that the licensee shall submit a commissioning report related to production of fuel pellets...that is acceptable to the Commission. Compliance documentation is then submitted to the CNSC staff at least 90 days prior to the start of pelleting.

Why the smokescreen? Why has BWXT repeatedly claimed that they have “no plans” to pellet in Peterborough when the wheels are already in motion? We, the stakeholders in Peterborough, suspect/fear that BWXT will, with license approval, be pelleting in Peterborough within the year. Final physical modifications will be made, under cover of the smokescreen, and pelleting operations will commence with no notification to us, the Peterborough stakeholder. That is, most assuredly, not transparent communication.

II.iv Mitigate damage or proactively avoid danger

BWXT really, really, really wants the public to believe that they will protect us. They use the words ‘protect’ and ‘protection’ more than fifty times in their Renewal document. GE did not protect us and we have no reason to believe that BWXT will be any different. **It is duplicitous to put the public in harm’s way and then promise to protect us.** It is no comfort to me to know that the emission levels of uranium dioxide will be “small” because uranium dioxide has a very, very long half-life and will

accumulate in my backyard, year after year. It is absurd to talk about “minimization of combustibles” (Renewal, p.41) when pelleting will entail the stockpiling of enormous quantities of highly combustible uranium dioxide powder very close to a huge tank of highly combustible liquid hydrogen. I am not comforted to learn that these combustibles are so dangerous that “a 24-hour, seven days a week guard presence at the Toronto facility and physical guard house at the vehicle entrance” is necessary (Renewal, p.44). It is no comfort to me to be told that BWXT is working to update its emergency response plan (Renewal, p.42) because, if the plan is activated, it means that something very bad has already happened.

II.v ‘Emergency preparedness’ is empty industry jargon

Commissioners, I have two grandchildren, three and five years old. I love them with all my heart and I look forward to their visits. We have a very nice backyard, with tall trees, a gazebo and a large pool. We have a wonderful time playing outside together. I teach my grandchildren proactive safety, ie identify the source of danger and stay away from it. I can’t teach them how to stay away from the danger that BWXT pelleting will bring right into my backyard. Hour by hour, day by day, week by week, month by month, year by year, the BWXT pelleting operation will release uranium dioxide into the air three blocks from my house. We will not be able to see it; we will not be able to smell it. It will creep into our lives, softly, softly. BWXT claims to give high priority to “emergency preparedness” but these are empty words, industry jargon for cleanup, after-the-fact, of the serious, perhaps even catastrophic, damage caused by a production process that knowingly emits carcinogenic material into the air.

II.vi We are human beings not blobs of “biota”

I am appalled by the callous labeling of adults as “human receptors” and my grandchildren as “the most exposed [ie vulnerable]...critical receptors” (EPRR, p.31) but, sadly, that is exactly how the industry regards us. We are passive, powerless blobs in the landscape, just like the “non-human biota” aka wildlife (EPRR, p.29). **Does BWXT have an “emergency preparedness” plan to care for my grandchildren if, years from now, they develop cancer.** This is not baseless fear-mongering. **Hundreds of GE workers have developed cancer. Family members of GE workers have developed cancer. Citizens of Peterborough City and County have cancer rates significantly above Ontario rates.** Your own documents (EPRR, pp38-39) confirm that tragic reality. It is immoral for BWXT to talk about mitigating the damage to children after they have knowingly exposed them to danger.

Commissioners, can you give me your personal, written guarantee that my grandchildren will never be harmed by uranium dioxide emissions from the BWXT Peterborough factory?

Section III: Summary Statement

Pelleting at the Monaghan Road factory will impose significant new types and new levels of risk upon our community. Large volumes of hazardous uranium dioxide powder will be transported through narrow, congested residential streets to the factory, located in the centre of the city.

Stockpiled uranium dioxide will be stored in close proximity to a large tank of hydrogen. Both uranium and hydrogen are highly combustible. Emissions of uranium dioxide from pelleting will be 3,000 times higher than at present.

Pelleting will be a death blow to the reputation and welfare of the entire city. We were once an industrial town. Today our top employers are education, health and services. Tourism and outdoor recreation are a vital part of our economic stability. Would you send your children to a post-secondary institution in a town that has a pelleting factory located within a kilometer of its downtown core? Would you rent a cottage, charter a boat, or go fishing along the Trent-Severn waterway if you knew that uranium dioxide powder was being emitted nearby?

Peterborough has already suffered deeply from GE-Hitachi's systemic mistreatment of its workforce. **The documentary, "Town of Widows" has been released and is spreading the story of how we have suffered, and are still suffering, from corporate greed and corporate lies.** GE-Hitachi betrayed the trust of Peterborough citizens and then facilitated the establishment of BWXT on their heavily contaminated property. We are confronted, once again, with a large, multinational corporation that says "trust us". GE seduced us with big summer picnics and Christmas parties for all the children of GE workers. As kids, my sisters and I thought that they were great fun. We did not know that GE was buying our silence while, all the time, our dad was working in a toxic workplace. BWXT's BBQ and other 'cute' events have the same paternalistic arrogance as the GE events of times past. BWXT issues the same glib phrases about safety. In their three years in Peterborough, **BWXT has done and said nothing to earn my trust. Having read all the slick and deceptive language in their license renewal documentation and in their public communications, I am convinced that they cannot be trusted.**

I am opposed to expanding the BWXT license to allow them to manufacture uranium dioxide pellets (hereafter referred to as pelleting) on the GE-Hitachi property, Monaghan Road, Peterborough Ontario and urge the CNSC to remove pelleting in Peterborough from the BWXT License Renewal Application.

