



**Written submission from
Adrienne Newman**

**Mémoire de
Adrienne Newman**

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

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

January 26, 2020

Dear Sir or Madam:

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

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

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

Because the location of the BWXT site, which is across the street from an elementary school and in the heart of a residential community, the activity BWXT is proposing poses alarming risks to the health and safety of Peterborough citizens. The storage of hydrogen and uranium dioxide powder within a neighbourhood of family homes and schools is ridiculously dangerous. Uranium pellet production is an unacceptable activity for this location. When something goes wrong, there is no buffer zone.

Peterborough is not a Safe Location

The City of Peterborough is prone to flooding. More frequent and more serious flooding is likely in the future due to climate change. Heavy metals and other contaminants will leave the BWXT site in rainwater and flow overland and via underground drains into Little Lake where families swim at Beavermead Beach. Peterborough has also been in the path of seriously damaging winds in the past few years downing giant trees which caused damage to homes,

businesses and power lines. We have also had ice storms and summer heat waves that caused power failures. Extreme weather events will significantly increase the amount of uranium powder leaving the BWXT site (beyond the monitored emissions), through the air and water.

Will BWXT be responsible for providing it's own emergency services if there is an accident or fire on the site? The city of Peterborough's emergency service providers should not be exposed to the serious health risks resulting from exposure to uranium powder. The City of Peterborough is not prepared to respond to a radioactive contamination event.

Accidents happen, and humans make mistakes. It is only logical to locate a manufacturer of uranium pellets outside the city. Locating the site close to schools, playgrounds, and homes, is an unnecessary and significant risk of serious harm to human health.

BWXT has had accidents at fuel pelleting plants in Canada and the United States. Can BWXT ensure the safety of neighbouring residents from accidents? What security measures could ensure that the site is not intentionally targeted?

The transportation of these substances to and from the site, through our city, pose additional risks to the community. What safety and security measures have been established to ensure safe transport of these materials?

The City of Peterborough will see property values plummet and economic investment vanish:

Home insurance doesn't cover nuclear damage and radioactive sewer backups. Does BWXT guarantee Peterborough residents adequate compensation for the clean up of their homes, the loss of property value, relocation to a safe new home? Liability insurance for BWXT is unlikely to be adequate.

If a potential home buyer considers the implications of the increasing uranium actual particle emissions to an average 134 billion per day airborne, and 20 trillion per day waterborne, who is going to relocate in Peterborough? Anyone would think twice about moving to a city that has radioactive heavy metal pollution, where monitoring equipment is needed to measure the radioactivity of our gardens. The city can expect falling house prices and a reduction in business investments.

The drinking water of downstream communities is also at risk:

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

Inadequate community consultation:

BWXT has not been forthright about their plans. A condition of BWXT's license is to communicate to stakeholders in the area around the plant. BWXT has failed to do this effectively. The only public notice of an information meeting impacting the health of our city was an invitation to a BBQ. Not many residents realized this was an opportunity to learn about a proposal to bring large hydrogen tanks and radioactive uranium powder into their neighbourhood

Distributing invitations to a BBQ does not give citizens any indication of the underlying reason for the invitation. Low attendance at a BBQ does not indicate that the community is not interested.

Finally, this site would not qualify for the current zoning required for the proposed activity. The community has grown up around the former GE factory. There is no buffer zone at all. BWXT may stress that operations will be guided by safety protocols and requirements for handling the hazardous materials, but accidents happen. People make mistakes. When they do, the avoidable consequences will be life changing for the people in this neighbourhood and for the city as a whole.

Please reject BWXT's request for pelleting in the license application. Also, please grant them a shorter license renewal timeframe of five years to allow for a more accessible consultation process to take place, that is informed by independent studies of the emission levels of this activity, adequate buffer distances, and the impact of these emissions on human health.

Sincerely,

Adrienne Newman