



**Supplementary Information
Oral Presentation**

**Presentation from
Peter Harris**

In the Matter of the

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

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

Commission Public Hearing

March 2 to 6, 2020

**Renseignements supplémentaires
Exposé oral**

**Présentation de
Peter Harris**

À l'égard de

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

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

Audience publique de la Commission

Du 2 au 6 mars 2020

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CMD 20 -H121

Peter Harris



SEEKING A RESPONSIBLE DECISION

Risk Abatement Before Profit

A FAILURE TO COMMUNICATE

- Communication is a critical license condition
- BWXT has no idea if its printed materials have been delivered as it relies on a third party for delivery.
- BWXT has not defined target audience to include French Immersion at Prince of Wales School
- Why isn't communication performance measured by the CNSC in a quantitative way?

MISLEADING THE PUBLIC

- ▶ Has not communicated a business plan
- ▶ “There are **no plans** to bring **pelleting** to Peterborough” was repeatedly used in newspaper articles
- ▶ The word “flexibility” is used in conjunction with BWXT’s application in CMD20-H2 four times.
- ▶ “I have also been assured that there are no plans to move their pelleting operations to this plant.” Mayor of Peterborough

I RESPECTFULLY REQUEST THE FOLLOWING;

1. Ensure that the school community is properly informed.
2. Demand clear and concise communication from licensees, particularly around license renewal.
3. The CNSC should measure communication performance.
4. Restrict the period of BWXT's current license until improved practices are implemented.

LIABILITY INSURANCE

- ▶ The CNSC requires no liability insurance for BWXT
- ▶ City of Peterborough requires no liability insurance for BWXT
- ▶ Households are not insured against accidents at BWXT owing to nuclear accident exclusions
- ▶ Misconceptions about insurance exist “Things like natural or nuclear disasters would be covered by government disaster relief or by company liability coverage for a nuclear accident so it is unnecessary for homeowners to have insurance for them.”

I RESPECTFULLY REQUEST THE

FOLLOWING;

1. BWXT should be required to have insurance that is aligned with the increased risk exposure associated with being a lessor of property operating a nuclear facility in an urban area.
2. The CNSC should delegate citizen representatives and insurance professionals to establish the risks associated with BWXT's operations. A liability evaluation should establish an appropriate liability value which BWXT should meet.
3. This figure should be made publicly available to assure residents they have ample coverage.

RELOCATE BERYLLIUM STACK

Why is BWXT's most dangerous emission next to a sidewalk and so close to the Public School?



The beryllium stacks on Monaghan Road

I RESPECTFULLY REQUEST THE

FOLLOWING;

1. Beryllium point sources on this property should be relocated to minimize public risk

EXPOSURE TO BERYLLIUM

- ▶ CNSC web site states “The CNSC has implemented its Independent Environmental Monitoring Program (IEMP) to verify that the public and the environment around licensed nuclear facilities are safe”
- ▶ Recent issues with rising beryllium levels in the soil indicate that CNSC staff have not used this data to prove that the site is safe before recommending that BWXT be allowed to extend its operation to include pelleting.
- ▶ Why did the CNSC claim that the hazards associated with the Peterborough site are “well characterized and controlled” when the IEMP data indicates the opposite?
- ▶ Since IEMP data is “Independent”, why is the CNSC not weighting it more heavily in its analyses?

EXPOSURE TO BERYLLIUM

- ▶ Recently released information indicates that there were serious issues with the handling of beryllium at the GE/GE-Hitachi/BWXT plant. Ministry of Labour recommendations were ignored by GE staff and the The Report of the Advisory Committee on Retrospective Exposure Profiling of the Production Processes at the GENERAL ELECTRIC PRODUCTION FACILITY in Peterborough cites “GE’s callous disregard for the health of workers and its poor safety culture.”
- ▶ The placement of beryllium point sources on this site maximizes public exposure to beryllium.
- ▶ Evidence has accumulated indicating that community exposures may have been under-reported ([Maier et al 2008](#))
- ▶ “CBD in residents surrounding a beryllium facility further supports concerns regarding risk of low-level beryllium exposures” ([Redlich and Welch, 2008](#))
- ▶ Evidence indicates that there is NO safe level of airborne beryllium exposure.
- ▶ Permitted atmospheric Be levels have dropped consistently over the years

I RESPECTFULLY REQUEST THE FOLLOWING:

1. The CNSC should work with the MECP, Health Unit and community to determine when effective beryllium pollution controls were installed at this plant.
2. The CNSC should begin a survey of former workers, residents and Prince of Wales students to determine if exposures in the community were extensive. An action plan should be created based upon these results.
3. Current students and residents in the vicinity of this plant should be offered BeLPT's
4. No license amendments should be granted until it is clear that there is effective stack monitoring and pollution controls for beryllium at the Monaghan site.
5. The license renewal period should be restricted until there is a full understanding of the historical and current issues with beryllium emissions at this plant.
6. A full public explanation is required from the CNSC as to why it ignored rising beryllium levels before recommending BWXT's license be renewed.

SITING NUCLEAR FACILITIES -

UNREASONABLE RISK

- ▶ The image to the right shows damage caused by a hydrogen explosion when a supplier filled a hydrogen tank
- ▶ Risk assessment was done by the hydrogen supplier at this site- the CNSC/BWXT also uses risk assessment from vendor (HAZOP) .
- ▶ Most pellet manufacturers use an [argon-hydrogen atmosphere](#) when manufacturing pellets. BWXT/CNSC does not.



SITING NUCLEAR FACILITIES -

UNREASONABLE RISK

- ▶ Despite not using a safer reducing environment, the CNSC has licensed pelleting facilities in residential areas
- ▶ There is no international precedent for siting a UO_2 pelleting facility of this type so close to a school.
- ▶ IAEA's siting guidelines for nuclear facilities states "*Special attention shall be paid to vulnerable populations and residential institutions (e.g. schools, hospitals, nursing homes and prisons) when evaluating the potential impact of radioactive releases*"
- ▶ Does siting a class I nuclear facility in a residential area next to a school abide by the IAEA's siting regulations?

SITING NUCLEAR FACILITIES -



- ▶ The 2013 GE/Hitachi Emergency Management Plan for Toronto states “The default evacuation distance from a radiological release as specified in emergency responder handbooks is 300 m.”
- ▶ Will the CNSC require emergency response training for administrators, teachers, and children at Prince of Wales School?

I THEREFORE RESPECTFULLY
RECOMMEND THE FOLLOWING

1. The CNSC should abide by international standards. It should protect the vulnerable. Siting a pelleting plant in a residential area, only 25m from a school would be in opposition to international standards. It would be “unreasonable risk”.

SUMMARY OF QUESTIONS

1. Why isn't communication performance measured by the CNSC in a quantitative way?
2. Why is BWXT's most dangerous emission next to a sidewalk and so close to the Public School?
3. Why did CNSC staff claim that the hazards associated with the Peterborough site are "well characterized and controlled" when the IEMP data indicates the opposite?
4. Since IEMP data is "Independent", why is the CNSC not weighting it more heavily in its analyses?
5. Does situating a class I nuclear facility in a residential area next to a school abide by the IAEA's siting guidelines?