



**Written submission from  
Sheila Nabigon-Howlett**

**Mémoire de  
Sheila Nabigon-Howlett**

In the Matter of the

À l'égard de

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

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

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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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laissée en blanc*

Request to intervene (written submission only) to [cncs.interventions.ccsn@canada.ca](mailto:cncs.interventions.ccsn@canada.ca)

From: Sheila Nabigon-Howlett. [REDACTED] Peterborough, ON, [REDACTED]  
[REDACTED]

I wish to categorically state my opposition to including in the 10 year renewal of license for BWXT-Nuclear Energy Canada, any possibility of this company making uranium dioxide fuel pellets at the proposed site.

I am basing my arguments on my own reactions as a retired teacher, and on the study by Robert and Dale Matteo in the Journal of Environmental and Occupational Health Policy of 2019 (vol.29-2).

My main reason is the site itself: Monaghan Rd. Peterborough is already a highly contaminated site from the industrial, chemical-based work of CGE over many decades. There are ongoing appeals to the WSIB from workers overexposed to a toxic mix of chemicals from the industrial plant. The plant has been idling towards closure for several years now – it should be prime real estate, but no one wants to touch such a contaminated plant. Present Hitachi (now BWXT) workers mostly come from outside Peterborough, so have not been exposed for years to the workplace contamination.

I have lived in Peterborough for 50 years and have heard frequently of the “horrible conditions at the GE plant” (p.139 of the study). Shortly after the release of the Matteo study the WSIB and Ministry of Labour announced reconsideration of previously denied cancer claims, and half of them were overturned. The study is comprehensive and (to my knowledge) scientifically irrefutable.

The site is next to an elementary school, Prince of Wales; I taught there for several years. The playground for the youngest students (JK, SK and juniors) could hardly be closer to the GE plant – it’s right across the road! Small children are close to the ground, they play in and on the ground; they put their hands in their mouths – they’re small children!

In 2014 air samples at Prince of Wales showed 13 X the background uranium concentration. What will that become if BWXT is allowed to produce the pellets across the road?

Unfortunately the CNSC has not yet embraced the precautionary principle when it comes to public health. I find it sad that our national regulator (supposed to act in the public interest) uses the ALARA principle at a time when some world authorities are seeing the importance of more not less regulation (witness the corona-virus outbreak) if we are to save ourselves from the business as usual paradigm.

Please do not grant BWXT permission to produce uranium pellets. If you do, at least make it a one-year rather than ten-year license.

Sincerely,

Sheila Nabigon-Howlett.