



**Written submission from
Lisa Wood**

**Mémoire de
Lisa Wood**

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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January 21, 2020

To whom it may concern,

I have recently been made aware that BWXT- Nuclear Energy Canada is seeking to renew their lease at the facility in Peterborough to include a provision to produce uranium dioxide pellets. As a local resident, I have serious concerns as the production of uranium pellets will result in a greater amount of uranium dust being released into the air and water. A factory such as this has no place in the residential heart of Peterborough.

Everyone understands that uranium is a radioactive heavy metal that is highly toxic. As a source of radiation, uranium is especially dangerous when inhaled, ingested, or when it enters an open wound, because it emits alpha radiation which is well known to be “more dangerous than other types of radiation...to cells and DNA” once it is inside the body (US Environmental Protection Agency). It is known to cause many health concerns such as cancer, miscarriages, and genetic defects. **The scientific consensus is that there is no safe dose of radiation** (The National Academy of Sciences), yet BWXT and CNSC appear to think differently.

BWXT and CNSC both claim that there are no harmful emissions from BWXT Peterborough and Toronto sites, but BWXT’s compliance reports suggest otherwise. In fact, tests show that BWXT facilities emit uranium concentrations far greater than the natural background uranium concentration.

- In 2016, air around the perimeter of the BWXT Toronto factory was tested at 390 times the natural background uranium concentration. (BWXT’s Compliance reports)
- In 2017, soil around the Toronto factory was tested at 10 times the natural background levels. (BWXT’s Compliance reports)
- In Peterborough, an air sample taken by CNSC in 2014 at Prince of Wales School was at 13 times background uranium concentrations. (BWXT’s Compliance reports)
- In 2017 and 2018, the Toronto plant released over 3000 times more uranium into the air than BWXT Peterborough did according to their own test results (BWXT website).
- In 2018, the Toronto plant released 94 000 times more uranium into the sewer than BWXT Peterborough did (2018 Annual Compliance Monitoring Report – BWXT website).

Some argue that Canada's nuclear regulator can be trusted and that our health is their top priority, but this is not true. The CNSC does not actually take a precautionary approach to the health of citizens because it operates under the ALARA principle – As Low as Reasonably Possible. This translates to allowable risk and allowable harm. Moreover, the CNSC reports to the Minister of Natural Resources, whose mandate is to promote the nuclear industry. As such, it has shown itself to be a flawed regulator when it comes to the health of Canadians.

Beryllium and some uranium are currently being released from the Peterborough facility which is an alarming reality that I only just heard about. If BWXT can produce nuclear pellets here too, even greater quantities of uranium dust will be released into our neighbourhood. In fact, it has been calculated that the fallout of radioactive uranium dust from BWXT could have a spread of 2 km (or greater) in diameter. This is a massive area where many live. It means that radioactive dust will blanket three elementary schools and children are especially vulnerable to radiation exposure. It will affect several residential senior homes, the main hospital, and hundreds of residential homes. As such, the potential for harm to the citizens of Peterborough is enormous.

In addition, with the change of operation, BWXT will have to use huge amounts of water of which will be released back into the sewers contaminated with uranium. BWXT will have to conduct soil samples in the surrounding back yards and at Prince of Wales public school. What happens when our back yards are contaminated? How will this affect our property values? What happens when our health falters? How and will the government compensate us?

Moreover, the former GE site is already compromised from earlier polluting practices that were allowed due to inferior environmental protection laws. Today, we have stricter environmental regulations, but for some unknown reason an environmental review of BWXT has been waived. This seems ludicrous given the fact that more contaminants will be released into the surrounding area, and **highly explosive** compressed hydrogen gas will be brought on site. All of this, going on only steps away from an elementary school and hundreds of residents. Accidents happen. A recent flood which saw contaminated water from BMXT spill out and into waterways was cause for alarm. It's our drinking water potentially being poisoned. Surely the priority for this site is to clean it up, not make it even more toxic and dangerous for those that work and live near it.

All too often companies come into communities, do what they do with little regard for the negative impacts they create, and then move on, sometimes leaving behind a toxic mess to contend with. Peterborough does not want to become another Eldorado story.

Considering the current environmental crisis, we must make informed decisions that focus on protecting the land, air and water for our health and our children's futures. We can no longer turn a blind eye and ignore facts. Governing bodies and business's such as BWXT cannot

continue to be allowed to favor profit over the health and well-being of humans and the environment. CNSC should not be the sole decision maker. This is a democracy and if the citizens oppose nuclear facilities in their communities in favor of true green technologies, then CNSC has an obligation to listen and find a more suitable location for nuclear (if there even is such a thing).

Concerned citizen,

Lisa Wood