



**Written submission from
Hiroshima-Nagasaki
Day Coalition**

**Mémoire de
Hiroshima-Nagasaki
Day Coalition**

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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**HIROSHIMA
NAGASAKI DAY**
Working together for
the abolition of nuclear weapons **COALITION**

January 27, 2020

To: Canadian Nuclear Safety Commission

Re: The BWXT (formerly GE-Hitachi) uranium processing plant at 1025 Lansdowne application to the CNSC for a 10-year licence renewal.

From: Hiroshima/Nagasaki Day Coalition

Dear members of the Canadian Nuclear Safety Commission,

We are writing to you in response to our grave concerns about the request for a 10-year renewal of the licence for the BWXT Uranium Plant currently operating in Toronto at Lansdowne and Dupont as well as the planned expansion for the plant located in Peterborough. We, the Hiroshima-Nagasaki Day Coalition (HNDC), ask that you not reinstate the plant's licenses, as they expose Toronto's citizens to dangerous levels of uranium radioactive and chemical toxins, creating an unacceptable level of risk to the health of all Toronto and Peterborough residents. Producing a substantial portion of the fuel needed for the Canadian nuclear industry, BWXT does so at great risk to those living on its borders, which exist in close proximity to residences, businesses and schools. As reported in Now Magazine:

Issues around [air quality](#) in neighbourhoods surrounding the facility have been an ongoing concern. . . .According to its own [Annual Compliance Monitoring Report](#), BWXT's Lansdowne facility has released 46.2 grams of uranium into the air and 3.62 kilograms of uranium in the sewer system over the past five years. . . .BWXT admits that "airborne particles can expose members of the public via inhalation," but claims the releases "are shown to be only a fraction of the annual regulatory limits." Those limits allow for 760 grams to be released into the air and 9,000 kilograms to be released into the sewer system every year.¹

Dr. Gordon Edwards of the Canadian Coalition for Nuclear Responsibility explains² that the fine power form in which uranium is processed into pellets can be inhaled in micro doses and lodge itself into the lung tissue upon inhalation or ingestion. Just one 0.3 micron particle carrying a range of 11 microns can deliver a rad dose per year of 248 milliSieverts, which can lead to exposures of 248 to 2480 times over the legal limit. Even if only a couple of people are exposed, is it worth the risk? We don't think so. Dr. Edwards says he "anticipates that the demand for CANDU fuel, is not going to be growing anytime soon with the future of the Pickering Nuclear Generating Station up in the air."³ Set to close in 2024—fully 24 years past its expected shelf-

¹ by [Zach Ruitter](#), *NOW Magazine* "Uranium processing plant in city's west end applies for 10-year licence renewal"

² Dr. Gordon Edwards appeared before concerned citizens in Peterborough on December 3rd as part of an info Night.

<https://www.youtube.com/watch?v=GzxwDjTMzbn&feature=share&fbclid=IwAR1JcpQWKIOpnOdlaulfHAEU-oBZF4e3w8UajZLjL9NXkKTeEqqT-tUXo>.

³ Ibid.

life—there should not be increased need for the uranium pellets, which fuel Canadian nuclear power plants if Pickering is shutting down in the near future.

Equally important, uranium processing facilities, if they must run, should be situated in areas away from citizens, cities, and potential residential growth and development; they should, at the very least, be surrounded on all sides by green or brown spaces, with no residential density allowed to build in the area. As a study undertaken by the group Good Neighbours Don't Make Radioactive Pellets shows, in countries where safety is paramount, such facilities are far from populated locations.⁴ Even if uranium dioxide dust weren't the extreme hazard that it is, the tank containing 9000 gallons of liquid hydrogen sitting just inside the Lansdowne facility fence is an extreme hazard. Should such a huge quantity of explosive gas be situated in the middle of a city block? As it is an extremely flammable explosive gas isn't it obvious that this is a danger to local residents? Especially given that a fire did occur at the Toronto BXWT plant in 2017, which fortunately was contained—but what if there is a next time? Where is the safety plan for such contingencies? Must we face another public utility tragedy such as the Lac-Mégantic rail disaster before our public utilities ensure that such hazardous materials cannot harm residential neighbourhoods? Besides, such a component has failed in other plants, most notably in Hanau, Germany, when the catastrophic failure of a tank with pressurized hydrogen occurred.⁵

As members of the Hiroshima-Nagasaki Day Coalition, including Mrs. Setsuko Thurlow, an atomic bomb survivor of Hiroshima, we are committed to the abolishment of nuclear weapons. Although some would point to the notion of atoms for peace as a justification for the ongoing use of nuclear power in Canada and beyond, we are of the mind that civilian nuclear power plants are the “Siamese twins” of the military use of nuclear weapons. As our HNDC colleague Phyllis Creighton wrote back in 2009:

The whole notion of “Atoms for Peace” – US President Dwight Eisenhower’s claimed harnessing of the destructive force of the atom for peaceful purposes – is phony. Nuclear reactors make the materials essential for the production of nuclear weapons widely available. France and China took the fuel from peaceful research reactors to piece together nuclear weapons. The CIRUS heavy water reactor that Canada supplied to India produced the plutonium India used for its first nuclear weapon, tested in 1974. Today, in 70 countries there are small research reactors, most fuelled with highly enriched uranium, which is suitable for nuclear weapons production.⁶

⁴ “Good Neighbours don't Make Radioactive Pellets. <https://www.nopellets.ca/unreasonable-risk>

⁵ Ibid, <https://www.nopellets.ca/unreasonable-risk>.

⁶ Phyllis Creighton, “The Siamese Twins,” A paper for the session on “What’s the connection between nuclear power and nuclear weapons?” at the No Nukes Teach-In, Earth Sciences Building, University of Toronto, 14 March 2009.

We ask the CNSC to consider these grave arguments, knowing that human health and safety are at stake, and that alternative options are available to insure a safe power supply while preserving the peaceful and healthy lives of Ontario citizens.

Thank you,



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On behalf of the Hiroshima-Nagasaki Day Coalition
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<https://www.facebook.com/hiroshimadaycoalition>
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