



Oral Presentation

Exposé oral

**Written submission from
Dan Rudka**

**Mémoire de
Dan Rudka**

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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Canadian Nuclear Safety Commission
Submission Statement for BWXT Application for a 10 Year operating License
in Peterborough and Toronto Locations.
Also include BWXT's further application for a Powder and Pellet production Operation
in Peterborough.
March 2nd & 3rd 2020

Members of the Board, the BWXT's request and your expected agreement for a ten year license is another effort to relieve the industry and CNSC from public pressure over nuclear operations for another ten years. You are taking away the public voice, maybe the biggest offense here. As was done effectively in Port Hope years ago and never should have been allowed given the nature of this industry and the ever increasing technical changes. In such controversial industry as nuclear, licensing should be tighter regulated, not loosened. The Department of Transport in most departments, has stricter and more frequent license renewals than the CNSC!

Any operation putting out any levels of radioactive pollution through their exhaust stack's, should not be located in a public occupied area, from the simple standpoint of inhalation of the material and the health implications. And a 2 kilometer radius of exposure fallout from these plants is a problem. After my exposure by way of inhalation, I can assure you that there is effect on the human body. It may be minor, more aggressive, origin probably misunderstood by physicians, or it may wait on the latency period before registering effect.

But how would you, the CNSC know this? You don't have a health department. And you don't want to know the details of victims. Health studies to date are not to be trusted due to the selectiveness of study area and process. As evident some years ago when I wrote and offered my time at the CNSC, in Ottawa, with the Commissioners, I understand that the letter was never handed to you or considered. When reported to the CNSC, the Commission only recommended Workers Safety Insurance Bureau, workers compensation.

Workers in these plants are at the most risk, and how are they assisted? Twenty years of effort, and refused in the face of evidence. A more recent effort was, after hours of 'full' investigation and a decision in favor pending, suddenly left unattended by a very caring WSIB adjudicator that for reason's not revealed, retired immediately without notice. And for six weeks and many calls to several supervisors and managers not returned, then I get a call that the claim has been refused. Next after extensive probing, the WSIB adjudicator admitted to a decision "against" the claim - "without" reading the complete file. And to add, someone in the CNSC just prior to that uninvestigated decision, started to investigate my personal files on computer where they

could, they got caught. Computer generated stories relating to my experience on Google are even disappearing after many years.

The relationship to this intervention against the BWXT operation in Peterborough and Toronto, is that if an exposed worker can be denied on so many levels, in the face of a great deal of evidence, how are we to believe that the public is safe or would ever be recognized, or compensated for related illness? You don't recognize nuclear related illness - until the end game, cancer appears. We can't trust, beyond your word where those that have watched, paid attention and have learned better than to trust the CNSC.

I have seen too many cases, heard too many stories of sick nuclear workers not being recognized or assisted. I am proof of that situation. The residents are put into a position between safe or unsafe, there will always be question and we know that there is a human health and environmental danger of much higher levels than admitted to. The public trust, based on truth and growing knowledge of nuclear, is justifiably fading globally. Why?

This material is dangerous, that is why you, the Canadian Nuclear SAFETY Commission exist. "SAFETY", because nuclear material is DANGEROUS! And the CNSC and industry downplay that even low level exposure is dangerous. That logic needs to be put to rest, it is history! Madam Currie, to incidents all through the decade's years, Chernobyl, Fukushima, 3 mile island, the list is long. And where are we in Canada, at the CNSC level, along the industry denial? Sadly we possess, the political weakness to allow a dangerous expensive industry in the middle of occupied areas to exist after decades of knowing better. An industry that burden's tax payer's pockets and our health care system with unacknowledged, misunderstood symptoms. But we complain of all else around it as we are distracted by other needs and concerns.

If workers are told that all is safe, and truly it is not that simple, they will be complacent in their safety and work, accidents happen. I have witnessed it. And if as explained in my incidence, they are exposed, who is going to care about it, the same people that took after me? It won't be CNSC, or the WSIB, doctors will be confused, the industry will deny. An American Doctor claimed that my level of care after exposure was not appropriate, lacking significantly. Exposure studies in Canada don't exist, not meaningful ones, due to that there is no proper treatment for what is not understood, a problem that I had often. Once doctors understood, after "listening", they were able to understand what to treat and, sometimes how - there is not much out there.

The CNSC, in my observation of decades, is too busy saving the industry and themselves to get into the job of true health safety that we pay them for, and then assurance of compensation when things are wrong. Where are you folks? Regulating the rules of industry so as to make safe for people like me, workers and the general population – the rules of safety, but nothing

beyond for those affected if some goes wrong. There is no place to go for help, real help. The workers need better, much better than they are being offered, and I mean recognition, safety and protection today and after retirement. What is needed is a policy similar to that of Firefighters. Lazy unions will not take that on – the CNSC should be on this. But to recognize illness is to admit...what you have for years denied.

So presently the exhaust stacks at BWXT are putting out some serious emissions, especially in Toronto, and you are willing to allow it to expand into Peterborough with a new powder and pellet operation? Increasing the radioactive pollution in a neighborhood with a school's right there? You should going in the opposite direction, reducing emissions, moving from populations.

I remember in Port Hope years ago at another CNSC hearing, it was pretty much agreed that if Cameco was not there and wanted to come to town, they would never be allowed to put that type of facility, nuclear, in the middle of a town, and on the lakefront – it would not happen. Well minus the lake, The CNSC has turned tail in considering, actually already accepting, this very type of dangerous operation in another town, Peterborough. What can I, and others think of that? Other than you are hypocrites? Revealing a double standard!

What is the plan? To continue in Toronto, or shut it down, moving it to Peterborough? Or will there two pellet production operations, one here one there? If so, then why?

If Peterborough is forced to accept this preplanned proposal, from BWXT and the CNSC, then it should be relocated out of town. And then possibly move the Toronto operation to the same location? Get it all out of the city. Why two operations of the same in a fading industry, with less demand? Move it all is the right idea, you can't realistically move the neighborhood. And to ask the people to live, play, go to school, work around a toxic plant or area with peace of mind is dreaming on your part. There is no peace or comfort in that. And to not recognize the health hazards, the issues, short term and long term that will be cast upon Peterborough, Toronto already, is irresponsible in this day. I hope that one day what you allow this day will be recognized as criminal, but will you pay the price? No, people like myself are paying for you negligence, lack of true interest, honesty of human health in regards to nuclear exposure. The taxpayers cover the burden, nuclear projects, high electricity bills, my medical expenses - about \$2 million and growing. And they are paying for you to do a much better job for people that you represent, or is it just the industry that is represented by the CNSC?

Rather than hand out every facility a 10 year license, especially Peterborough with a significant upgrade proposition, causing higher exhaust volumes, you need to tighten the program, monitor and watch more closely. If they go ahead with the powder and pellet program, you need to be watching that plan in progress daily and annual licensing for the sake of the public's

right to know, and comment. You shut off Port Hope's voice years ago, so few in town know what the company is up too. And to look at operation in that town, it is a spin as to what is really behind the company, and the CNSC, in the company's regard.

Tell me, did the CNSC actually extend Port Hopes relicensing of Cameco until 2028? Rumors abound that the CNSC snuck one in on us, did you?

Adding the extra operation in Peterborough at the BWXT plant is to spurn Peterborough residence into heated division in the foreseen future. The same industry has Port Hope, a great example of mistaken placement of a nuclear fabrication and manufacturing plant. And you want to do it again when you could and do have opportunity to move all out of town in Peterborough and Toronto and amalgamate in a safer area? That might save some expense, might save Peterborough, from future grief.

The CNSC has no public testing methods for nuclear exposure, what is there for the worker's is minimal and not revealing enough. The CNSC has never worked towards a proper level of public testing. There are, as I mentioned a few years ago, based on all that I have learned, methods to indicate public exposure and health effects around these nuclear facilities. At that hearing I spoke mostly on health, based on the fact that Pickering power Station has only one containment building, that was a danger. One question came from this Board on containment not health, the main topic of my concern.

This is the disturbing part - health is the main concern of the people in this area. The problem or conflict being, that jobs are also important to the people. In my case what good is a job of a couple of years when you become work related disabled, permanently retired, double lung transplant, no compensation for all the damage, and about a \$2 million medical tax bill for the taxpayers? I cost more since being exposed, than I ever would have made having a healthy work life and retirement. Nuclear is damn expensive, all around. Just imagine the medical expense of one serious accident involving multiple people?

The CNSC MUST protect the people first not the industry. And allowing an operation that will increase stack emissions, in a public neighborhood is irresponsible. I don't know law, but I think that putting the public at known risk is against the law. But I would not know, it the CNSC that can afford the legal advice to protect themselves at these hearings - and not for public use, but paid for by the public. Where is the civilian protection outside the boundaries of this company's property? It is over 2 kilometers away, and zero security inside of that circumference, depending on the wind. Would you knowingly, willingly step into a zone that you understood could be harmful? Well the CNSC, industry all believe that you should take that chance.

And I believe through years of experience that the CNSC absent of any real power over this

industry, and is effectively 'owned', directed by the nuclear industry. The same nuclear industry, that directs our politicians, can no longer, if it ever could, properly protect the public in a populated environment or worker environment. Canada is under a 'nuclear corporate takeover', very silently manipulated – look no further than SCN Lavalin and our Prime Minister, breaking the law for jobs.

The last many years of what I have seen of our country's trusted, high authority, the negligence, without help of the CNSC, the industry, our politicians, has had me lose all faith in our country's chosen, appointed, elected. I have seen the very dirty, manipulative efforts, out and out lies, to conspire, hide the truth, and watch a man and a family lose all their prior successes. Canada now, thanks to all that we "trusted", still the best country?, presents the most worldly deceiving image as a good, honest and fair country in many respects. Nuclear, the CNSC and much around it, has led the way to this conclusion. All because the truth of one incident has snowballed into so many untruths and denial that faith in country has faltered. The reason? It's nuclear! Does that mean a damn thing to you? It does to me.

When this mess in my life started, I was asked by the union leaders, "what happened"? What did you tell the company? I stated, "The truth." The union reply was most serious in stating, "That was your first mistake." And I will stick to my truth as I have all along!

And for me it has been the CNSC that dropped that ball. You have an important job – for the industry, lucrative pay, run around with your security, the security that we ask for, and need, you get. It is the CNSC method of operation, mandate and secrecy that has initially destroyed my trust and faith in this country.

One exposed worker and it snowballed into a life's effort of learning what you, the CNSC, won't listen too, I have more time at this than some of you, many have retired, but none will believe that I could have learned a great deal more than some of you. Experience is the teacher, you, the CNSC, are the student at times, in the face of experience.

Respect the local majority around the BWXT locations in their need to not have this operation grow or continue in a public area! If you can't protect the people of this area, the children- our future, then this Board need to be replaced, it has been the same old game, the same rhetoric, uninterested responses over decades, we need something new. For now the center of interest is BWXT operations, we need to work on the regulator, next.