



Oral Presentation

Exposé oral

**Written submission from
Aaron and Bree Walpole**

**Mémoire de
Aaron et Bree Walpole**

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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In 2019, I learned through community communication and local media that BWXT-Peterborough applied to start making uranium fuel pellets to power nuclear reactors at their facility on the old GE grounds. We have several concerns with the proposed application.

1. Fine Uranium Powder and Emission Distribution

We understand that pelleting would be a new process in our committee. Uranium fuel pellets are made from a very fine radioactive powder. Although filters and other mitigations are required to reduce the amount of materials that escape, escapes happen and the particles that do escape are minute. Based on BWXT reports (2018), our community can expect an exponential increase in releases of these toxic particles - fine uranium powder. These toxins could be easily inhaled or ingested. In fact, inhaling a single particle can be extremely dangerous. What strategies will be put in place to address this risk to BWXT workers and for the people of our community, including children who study and play at a school adjacent to the property?

2. Radiological Hazard and Chemical Hazard.

It is our understanding that although uranium may be deemed 'safe' compared to other radiological hazards, it is classified as a type 1 carcinogen if ingested or inhaled. It is also a heavy metal with health implications similar to lead. As stated above, the community can anticipate an exponential increase in the release of uranium if pelleting operations commence at the BWXT Nuclear Energy Canada factory. How will this operation impact local residents' risk of getting cancer? How will the pelleting process impact levels of heavy metals in the environment and in the people of Peterborough? We have not received any information on an emergency plan should there be an emission release.

3. No Environmental Assessment.

It is our understanding that an environmental assessment shall be required for the proposal, as BWXT Nuclear Energy Canada is proposing to undertake a new development activity (or change in use). Which regulatory agencies will review this proposed use? Will the proposal be available through Ontario's Environmental Registry for public comment?

How can the CNSC approve or deny a licence for a new industrial process without an independent scientific review of the risks to the surrounding air, land, water, wildlife and people?

4. Treaty Rights.

I understand that the BWXT-Peterborough facility sits on the traditional territory of the Anishinaabeg Mississauga. To your knowledge, has BWXT Nuclear Energy Canada undertaken appropriate and respectful engagement for this proposed pelleting process? Do they have their support for this new industrial process?

5. Accidents and Emergency Risk Management Plans.

Accidents happen. Workers may accidentally wear the wrong protective gear or unforeseen environmental events, such as storms, freezing and flooding can result in unintended consequences. If pelleting begins, 1500 metric tons of uranium powder and a 9000 gallon tank of liquid hydrogen will be on-site. What requirements are in place for emergency risk management (e.g. plan)? What opportunities exist for independent review by experts and community members? As an emergency is likely to impact the local community, the community should be provided the opportunity to provide input and should be aware of mitigations, procedures and possible consequences.

6. Health Risks to Children.

Women and children are known to be much more vulnerable to both radiological damage and chemical damage. The site that is proposed for pelleting is adjacent to a public school, and a five minute walk from another. The proposed site is within a residential area with numerous families and home daycares. Given the vulnerability of our children and the known health risks posed by pelleting, the location of the pelleting facility is unnecessarily putting our community's children at risks. This is not acceptable. What measures will be put in place to accommodate the affected families and children?

Thank you for the opportunity to consider my concerns through this intervention application.

Aaron and Bree Walpole