



**Written submission from  
Caroline Tennent**

**Mémoire de  
Caroline Tennent**

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*

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**From:** Caroline Tennent  
**Sent:** January 11, 2020 12:03 PM  
**To:** Interventions (CNSC/CCSN)  
**Cc:** Caroline Tennent; Caroline Tennent  
**Subject:** Re Intervention by Caroline Tennent for the BWXT Licence Renewal (Hearing Ref 2020-H-01)

January 11, 2020

Senior Tribunal Officer, Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street, Box 1046, Station B  
Ottawa, Ontario, K1P 5S9

To whom it may concern:

Re Intervention by Caroline Tennent for the BWXT Licence Renewal (Hearing Ref 2020-H-01):

I am Caroline Tennent and I request to intervene in writing in the above referenced matter in Peterborough. By this letter, and pursuant in the CNSC's Rules and Procedures, I request status to participate as an intervenor in writing in the public hearing.

I am writing to express my deep concern and opposition to the application for the BWXT licence renewal and in particular my opposition to the inclusion of the option for their making uranium dioxide fuel pellets in Peterborough. I am also opposed to the length of the licence they wish granted. A 10 year licence renewal is much too long.

I am opposed to making uranium pellets in a residential area in such proximity to a public school. I live within two kilometres of the site and I have a granddaughter attending the school Prince of Wales in junior kindergarten. Picking my granddaughter up from school, I see how close they are to BWXT. I see the children on the ground playing. Especially the young children really touch the ground and will take into their vulnerable bodies any contamination that exists. For me this is the crux of my opposition. I am outraged that there would be any consideration at all of locating a potentially damaging operation so close to a school with young children. I don't want my granddaughter attending that school if the license is granted and I feel deeply troubled that a school, a neighbourhood, and in particular children would be jeopardized by a multinational company vague on details of how they plan to proceed handling hazardous materials.

Also, I am a high school teacher in Peterborough and have lived and worked here for many years and am concerned also for all the residents in proximity to the site - and concerned for the reputation of the community itself. People who live in a community should not have to worry about the dangers of uranium in their neighbourhood.

If approved in their application to do the uranium pelleting here in Peterborough, BWXT would be able to handle large amounts of a very fine uranium powder that is easily inhaled, ingested, or absorbed into the body through a cut or abrasion. Uranium is a very long-lived radioactive heavy metal that poses both a chemical and a radiological hazard when inhaled, ingested, or absorbed. Children are especially vulnerable to radiation and heavy metal exposure. Once inside the body, uranium is classified as a type 1 carcinogen according to the WHO.

You have a mandate to protect human health and in particular to protect those most vulnerable. Making these pellets significantly increases the dangers to human health and particularly children. The company argues no effects but clearly companies have made such claims in self-interest in many circumstances and been proven wrong. We need sufficient time and a full impact assessment to determine the actual effects of uranium pelleting.

We do know that beryllium and some uranium are currently released from the facility. If BWXT is allowed to produce nuclear pellets here, much greater quantities of uranium dust would be permitted to be released.

We do know children are especially vulnerable to radiation exposure. We know that the scientific consensus is that there is no safe dose of radiation.

We do know that with a change of operation, BWXT would be using huge amounts of water. Much of that water would be released back into the sewers contaminated with uranium. In 2017 in Toronto (where uranium pelleting currently occurs) BWXT released 1,295,560 liters of contaminated water into the sewers compared to 820 in Peterborough.

We need to have a full assessment of the impact of such a facility and the making of the uranium pellets here or in any location. We need the process to be more transparent and detailed with more local input into the project. There are too many questions and concerns to proceed at this time.

There are no clear details around environmental monitoring and its costs. Why not?

It is important to consider our responsibilities to the local First Nations in this area. Have they been adequately consulted about the potential impacts of making uranium pellets on air, water, and soil? What are our responsibilities as outlined in the Truth and Reconciliation Commission?

What are our responsibilities to home and business owners in the area? Do they know how potential radiation in the area and potential accidents will affect the value of their homes and businesses? GE has already given Peterborough the name City of Widows. Is this something we want for our community?

What thoughts have been given to potential accidents? Making uranium pellets would include situating a huge tank of the compressed gas liquid hydrogen that is potentially explosive located in a residential area. What about transporting uranium into Peterborough if there are road, criminal, or weather events? Powdered uranium dioxide is flammable. Who is responsible if there is a fire of this kind? And who is responsible if tests reveal contaminated soils at the school or surrounding area? How will that be handled given we know contamination from GE already exists? What plans are there to handle that contamination? What plans to handle decommissioning the site?

I reiterate that I am completely opposed to a ten year licence renewal for BWXT that would include the possible making of uranium pellets at the site in Peterborough.

Please could you let me know you have received this Intervention and that it is correctly submitted?

Sincerely,

Caroline Tennent

[REDACTED]

Peterborough, Ontario

[REDACTED]

[REDACTED]

[REDACTED]