



**Written submission from
Megan Vincett**

**Mémoire de
Megan Vincett**

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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To the members of the CNSC,

I am a resident living less than a block away from the BWXT facility with my husband and two young children. I am writing to intervene against the 10-year extension of BWXT's licence.

According to the International Atomic Energy Agency (IAEA), as described in their safety standards document (IAEA Safety Standards for protecting people and the environment Specific Safety Guide International Atomic Energy Agency Vienna ISBN 978-92-0-102415-2 ISSN 1020-525X No. SSG-35 Site Survey and Site Selection for Nuclear Installations), there are four broad criteria used to select site locations for nuclear facilities. The first examines **natural hazards** that might impact the safety of installation (e.g. river flooding, volcanos etc.). The second looks at **human induced events** and nuclear security events (e.g. surface transportation such as railroads, air traffic corridors, military facilities, or chemical plants). The third consideration examines the impact on the surrounding **people and environment** (e.g. atmospheric and surface/ground water dispersion of radioactive material, population density and distribution). The fourth consideration is the feasibility of implementing an **emergency plan** (e.g. physical/infrastructure/population/regulatory characteristics etc.).

BWXT is currently operating a Uranium Processing Facility in the center of the most populous city in Canada (over 2.9 million residents according to the most recent data from the City of Toronto). Dovercourt-Wallace-Emerson-Junction, the neighbourhood within which the facility is located, has been undergoing rapid development and increase in population density. This is evident in the multiple condo towers built on the north west corner of Dupont and Lansdowne in the last couple of years, as well as the influx of townhouses and lofts built on the west side of Lansdowne, north of Dupont, and most significantly, the current development of *Galleria on the Park* at Dufferin and Dupont, which boasts an influx of over 6000 new residents to the neighbourhood. The degree of rapid change to the neighbourhood is evidenced by the City of Toronto led, *Geary works planning study*, which aims to investigate the substantial developmental pressures within the area.

If we look at the above described criteria, it seems unfathomable that this location would be deemed an appropriate site for a nuclear facility. In regard to **human induced events**, the facility is directly adjacent to a railroad track. The busy corridor within this neighbourhood includes both a north/south and east/west railroad line where the GO train as well as the UP express (transporting people from downtown to Pearson airport), have a combined ridership of approximately 6.4 million people yearly. Beyond human occupants, the myriad of other potentially hazardous materials being transported by the CN rail line provide additional cause for concern. Together, these factors highlight the unsuitability of this location for a Uranium processing facility.

Regarding considerations of the **people and environment**, although the emissions tests (both airborne and soil samples) that have been shared by BWXT indicate negligible amounts of uranium based on CNSC standards, at the information meeting on January 22nd, they indicated that BWXT self-monitor the plant's air and water emissions of uranium dioxide. An external regulating body should be tasked with making sure that BWXT is meeting environmental safety standards. Additionally, although individual samples taken suggest low emissions, we must also consider the longer-term, cumulative risks of living adjacent to the facility and experiencing exposure to smaller amounts of Uranium Dioxide over time. Although BWXT indicate that they have performed health assessments at their Peterborough facility, no such assessment appears to have been performed at their Toronto location. As such, an epidemiological report should be done in the adjacent area to examine risks of any elevated health concerns. Finally, the facility happens to be located right next to an apartment complex (1011 Lansdowne Ave.) that houses some of the city's most vulnerable citizens, including clients of the Centre for Addiction and Mental Health (CAMH) who are in

transition to independent living spaces. When asked at the January 22nd meeting about safety of airborne emissions, the engineer indicated that they were largely concerned with risks for employees directly on site at the facility, but not beyond, however, when you look at where the smoke plume is located, it is right next to the windows of 1011 Lansdowne Ave, raising legitimate concerns for the safety of these particularly vulnerable members of the community who may lack the ability and/or resources to advocate for themselves.

Finally, considering the worst-case scenario and feasibility to implement a **plan in the event of emergency**, at the January 22nd meeting, when asked to speak to this directly, BWXT were unable to detail any sort of emergency plan. Their website suggests that they have a plan in place and that they engage in emergency response drills quarterly. As someone that would be directly impacted by any such emergency, significantly more transparency and community outreach is required. From the several neighbours that I have spoken to in the area, few of them were aware of what BWXT does, not to mention have received any briefing on what to do in the case of an emergency and what measures have been put in place in order to guarantee the safety of community members. In 2016 the City of Toronto reported a population of over 36,000 residents in the Dovercourt-Wallace-Emerson-Junction neighbourhood. As discussed, this has increased drastically since 2016, not to mention the fact that the facility borders two other neighbourhoods (Corso-Italia with a population of 14,133 and Weston-Pelham Park with a population of 11,098). In the event of a significant emergency, *what is the plan?*

BWXT appears to exist in relative obscurity as it quietly attempts to push forward an extension of the current activities at the intersection of Lansdowne and Dupont, a site that based on the above listed criteria and IAEA standards, would not be deemed appropriate for such activities. There is no reason, therefore, that a licence should be extended for such purposes today. For the safety of my children, family and community who I love, I ask that you re-examine the merits of this licence extension.

Thank you for your time and consideration of this intervention,

Sincerely,

Megan Vincett