



**Supplementary Information
Oral Presentation**

**Renseignements supplémentaires
Exposé oral**

**Revised written submission from
Zahir Topan**

**Mémoire révisé de
Zahir Topan**

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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REVISED WRITTEN SUBMISSION
FILED ON FEBRUARY 17, 2020 BY ZAHIR TOPAN

To : CNSC

Re: 10 year licence request by BWXT to process uranium into fuel pellets in the city of Peterborough.

We request the licence not be granted.

Here are just a few of the reasons we urge you to **NOT** to grant a licence to BWXT to process uranium for pelleting, a most toxic element, in our city of Peterborough:

- Accidents happen! There is absolutely no guarantee that accidents will not happen! It is completely unacceptable to risk making our city vulnerable by allowing the processing of nuclear fuels in a densely populated residential area; it poses a grave and long term threat - especially to all our children.
- This licence to process cannot guarantee zero leakage. There is always some radio-active leakage! There are no guarantees of totally eliminating all leakage during processing. Minimizing radio-active dust leakage is not a possible option within a city, especially with particularly vulnerable children in schools nearby, if you are considering their long term health.
- -Just because buildings and land have been allowed to be made toxic by a previous industry, that is not a qualifier for another toxic industry to move in. There has to be an ethical and moral limit to living with toxicity in our city of Peterborough, after many concerns expressed through the decades that were not actioned. The city block location being considered and partly occupied by BWXT already has a historical problem of toxicity that has not been resolved. It tarnishes Peterborough's reputation as a partly toxic city. The people of Peterborough say, "ENOUGH"!
- Transportation logistics pose even more problems, due to possibility of accidents caused by the moving of fuel and equipment and possible human error. Even sending by rail, a much safer option, is risky transportation for toxic chemicals because many operational and human error accidents can still occur, for instance the Lac Magentic catastrophe.
- There is mention of moving all operations of pelleting by BWXT from Toronto to Peterborough after the licence is granted. This is a licence waiting to be granted so expansion of pelleting can be realized. It follows that more toxicity is most likely part of the eventual plan. The business plan submitted by BWXT should be scrutinized thoroughly and vetted for their expansion goals.
- There is an explosive risk associated with the quantity of hydrogen needed to be stored in the industrial facility location. There is no way to guarantee of a mishap occurring with no explosion! After the accident, **due to human error**, of the Toronto Sunrise propane filling station located in Downsview, it became immediately apparent that such a facility should not have been allowed to exist any longer in a densely populated city.
- BWXT adequate liability insurance due to accidents and incidents is also an issue worthy of concern due to lack of a buffer zone to schools and residents.

- Property market values in our city are finally on the upswing due to GTA population spillover, Highway 407 implementation just completed, our Lift Locks are a national heritage site, there is growth in municipal tax revenues, and quality of life together with the beauty of our city are tangible benefits of our vibrant city -- and should not be undermined by bringing in the proposed nuclear fuel processing. People of Peterborough are most concerned by the granting of this licence or any other related licences for toxic chemical processing in the city!

- We, as humanity, are already living with the effects of the nuclear accidents that have already occurred all around our precious planet! These accidents have caused much grieving and untold suffering for the many permanently affected families!

- Locally, nuclear processing has crippled the town of Port Hope for decades, and the costly major cleanup will likely take another decade, or maybe more. There are still issues involved regarding the safety of processing nuclear materials, making it a constant danger or threat to every living thing in its vicinity! Nuclear processing is just too dangerous for a city to consider permitting within its boundaries. We have the second largest country in the world, so there is absolutely no good enough reason to process a deadly chemical within the heart of any vibrant Canadian city!

In closing, here are very important questions:

- What safety regulations and data prove that nuclear processing is totally without any risk to our city's people, and especially our children in the long term?

-Furthermore, what safety measures and regulations will eliminate dangers posed by other chemicals used in the process, such as hydrogen?

-How will the above be monitored to ensure maximum safety and accountability?

-Will BWXT liability insurance be adequate in case of an accident?

We humbly request to be assured, through our Access to Information right, that all the pertinent details that ensure our safety in all aspects of BWXT's operation are being properly addressed, before granting any licence to process uranium for pelleting in our city. Their request for a ten year licence is not sensible for the aforementioned reasons.

Thank you for requesting the city of Peterborough's public feedback before granting a 10 year licence to BWXT.

Sincerely,

Zahir Topan
Resident of Peterborough,
Ontario.