



**Written submission from
Sheila Collett**

**Mémoire de
Sheila Collett**

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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From: Sheila Collett
Sent: January-23-20 5:36 PM
To: Interventions (CNSC/CCSN)
Subject: Intervention for BWXT Licence Renewal (Hearing Ref 2020-H-01)

January 23, 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 Sheila Collett for the BWXT Licence Renewal
(Hearing Ref 2020-H-01):**

My name is Sheila Collett and I request to intervene in writing in the above matter in Peterborough. By this letter, and pursuant to 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 of making uranium dioxide fuel pellets in Peterborough. I am also opposed to the length of the licence that BWXT is requesting. A ten year licence renewal is far too long.

I am opposed to making uranium pellets in a residential area particularly in such close proximity to a public school and a residential neighbourhood. Prince of Wales Public School is an immediate neighbour to the BWXT site. If approved in their application to undertake 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. Once inside the body, uranium is classified as a type 1 carcinogen according to the World Health Organization. Children are especially vulnerable to radiation and heavy metal exposure. I strongly believe that pupils attending the nearby school, as well as the families living in the immediate area, would face significant increased health risks if this license is granted. I am deeply troubled that you would allow a school, a neighbourhood, and in particular the health of young children to be jeopardized by a multinational company vague on details regarding how they plan to proceed in handling hazardous materials.

I am a long term resident who appreciates the many joys and strengths of the Peterborough community, and as well I have a deep understanding of some of the challenging issues our community currently faces; precarious employment, a severe housing shortage, and an opioid crisis. The World Health Organization defines health as a state of complete physical, social and mental wellbeing, not merely the absence of disease, and it affirms that “there is no health without mental health.” As a mental health clinician working in a busy downtown medical clinic I witness everyday the connections between physical and mental health. I also see the impact of social and economic factors, the living and working conditions that people experience everyday, also known as the social determinants of health, on people’s health and wellbeing.

You have a mandate to protect human health and in particular to protect those most vulnerable. As outlined in paragraph three of this intervention, making these pellets significantly increases the dangers to human health, particularly to children. But have you considered as well the mental health impacts? This application, if approved, would allow BWXT to handle large amounts of the long-lived radioactive heavy metal uranium, known to pose chemical and radiological hazards to human health, in the form of a fine powder that is easily inhaled, ingested or absorbed. Have you reflected on the stress and strain of working and living under such conditions, knowing that you and your family members are exposed to this hazard everyday by virtue of where you work, live or go to school? And please do not under-estimate the risks to health of such stress; the National Institute of Mental Health argues that chronic stress contributes to serious health problems, not only physical, but to mental health issues including depression and anxiety.

The company argues there will be no ill effects but clearly companies have made such claims in self-interest in many circumstances and been proven wrong. In Peterborough we have such a legacy at this very site; see the following link to a joint CBC/Toronto Star investigation that demonstrated that the former owners of the property, Canadian General Electric, left behind a toxic legacy, finding that “PCBs buried on the 21-acre property are leaching into the soil and groundwater. and hundreds of workers have won compensation for illnesses stemming from chemical exposures at the plant.” The investigation also revealed that despite earlier denials, the company later acknowledged that “Some employees in Peterborough may have taken home surplus asbestos.” According to Keith Riel, a Peterborough city councillor who used to lead the GE workers' union, "Hundreds of homes in Peterborough are insulated, up in their attics, with this loose asbestos. If they've only done (removed the asbestos from) a couple of dozen, then that's just not even the tip of the iceberg." <https://www.cbc.ca/news/business/asbestos-peterborough-general-electric-cleanup-1.5283683>

Ironically, while preparing to write this intervention I, like many in Southern Ontario, received a Provincial emergency bulletin applying to those within ten kilometres of the Pickering Nuclear Generating Station informing people that an “incident” had occurred, and advising them to stay tuned to local media to await further instructions and information. While we are now informed that this alert was issued in error, one can begin to imagine the acute stress felt at the time of the alert by those within the ten kilometre radius, and perhaps sense the uncertainty and stress of living with this ongoing threat to health and safety.

I believe that the risks to human health, both physical and mental, are simply too great. We need at the very least, sufficient time and a full impact assessment to determine the actual effects of uranium pelleting at this particular site, given its residential neighbourhood and school proximity, along with its legacy of both toxic environmental impact and inadequate protection of human health. There are no clear details around environmental monitoring and its costs in BWXT’s license renewal application. Why not? 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.

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.

Could you please acknowledge receipt of this intervention so that I can be confident that I have correctly submitted it and that you have received it. I trust that you will give these concerns your full and diligent attention.

Thank you very much,

Sheila Collett

Peterborough, Ontario