



**Written submission from
Lara Elizabeth George**

**Mémoire de
Lara Elizabeth George**

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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laissée en blanc*

My name is Lara George. I'm both a resident and property owner of multiple homes in Peterborough. This city is my home, but it is also the place where I've invested the entirety of my life's savings. I'm committed to this place & I care deeply about both the environmental & economic health of this city. As a resident & property owner, I'm a stakeholder in this community and I have grave concerns about the license renewal for the BWXT Ge-Hitachi site which is currently before you. I respectfully request satisfactory answers to a variety of questions I have about this license renewal, before granting the license is even considered. I also request an outright denial of BWXT's request to option a pelleting operation in Peterborough.

Before I continue, I'd also like to explain another reason I'm invested in the outcome of this license renewal. Members of my family live well within the proposed 2km radius of 'affected residents' in Peterborough. They have a young son. He's three. He loves trucks, bulldozers, airplanes, and mechanical and construction vehicles of all kinds. He's curious, smart, funny & kind. My female family member is pregnant. She deserves to raise her son & new baby in a community which isn't polluted by radioactive particles. Her children deserve to go to a school which isn't next to a Class 1 Nuclear facility. In the event of an accident (no matter how small) – are we as Canadians comfortable with the literal front line of exposure being the most vulnerable & least resilient members of our community? I know I'm not.

Thank you for your consideration of my concerns.

Concern for proposed site re: flood risk

Peterborough is a city which regularly floods. Not only during 'once in a century' storms (as claimed on the BWXT website), but regularly with spring thawing. With changes in climate Peterborough also often floods several times in the winter as snow thaws & the ground is still frozen.

BWXT claims only minor flooding occurred during the 2004 flooding and that they have adequately prepared for future flooding by the construction of a berm. Even 'minor' flooding will contaminate groundwater & could potentially spread that contamination into the community. When dealing with particles which are so small & so dangerous, any amount of contamination is unacceptable. Should the pelleting operation be approved, there will by definition be more radioactive dust present, and the risk to the community during a flood will be exponentially higher.

- What is the emergency flood plan for the new facility?
- How will flooding be prevented for this facility?
- Where is floodwater being directed to in the event of a flood?
- How is floodwater being decontaminated in the event of a flood?
- How is groundwater contamination being prevented?
- How will flooding be communicated to the community & will this affect the operations of the school nearby?

Concern for proposed site re: Age of building

The proposed site for this operation is an extremely old, decrepit building. It is constructed of brick and wood. Neither of these materials are nonporous or easy to clean. It is already run down, with windows boarded up.

- What is the plan for creating an adequately protected building?
- What is the plan for renovation/demolition?

Concern for proposed site re: Contamination of proposed site

The proposed site for this license application is already contaminated. This current contamination is not addressed in the documents proposed by BWXT.

- When will the current contamination be cleaned up, and by whom?

Concern for proposed site re: Proximity to Prince of Wales School

The proposed site for this license application is directly adjacent to the Prince of Wales elementary school. Children attend elementary school for 8 years – a sufficiently extended period of time to reasonably assume some level of exposure. Children are the most vulnerable members of our society to the effects of radiation, as I'm sure you are all aware. Factors such as: the rate of cell division & proximity to the ground (children are shorter than adults, remember?) are thought to be reasons why exposure is both more likely & why the effects are significantly more devastating for children.

- Would you want your children attending elementary school next to a Class 1 Nuclear Facility?
- Have the significant effects of radiation of children been sufficiently researched with regards to the specific proximity of the proposed site to the school?
- What emergency interventions have been proposed in the event of an accidental exposure?

Concern for environmental health:

Pelleting is much dustier & riskier than the current operations. By definition it will pose a significantly higher risk of contamination through transportation and manufacturing.

- How will the contamination of vehicles transporting pellets & materials in/out of the facility be moderated?
- Has there been an investigation into the degree to which pelleting changes the levels of radiation in the direct proximity to the site – and has this information been cross referenced with the effects of radiation on children, as children will be in direct contact with the air, water & dust from this facility?
- Has there been an environmental assessment done?
- What steps will be taken to prevent contamination of air, water & earth, and how can efficacy of these steps be measured if there hasn't been an environmental assessment conducted?

Concern for human health re: Danger & training for emergency personnel

The pelleting license application does not address the strain which such an operation will place on our municipal emergency personnel in the event of an accident or exposure. It is reasonable to anticipate that with an increase of radiation and radioactive particles the likelihood of an accidental exposure or a significant exposure event is higher.

- Has strain on resources, additional danger & training for emergency personnel such as firefighters, paramedics, nurses & doctors been considered and budgeted for?
- Who will pay for medical supplies & training?
- How often will emergency procedures be practiced?
- How often will emergency supplies be checked, inventoried & rotated?
- How often will emergency procedures be reviewed? By whom?
- What protections will be offered to emergency personnel? Who will pay for these protective measures?

Concern for human health re: Emergency preparedness

In the event of an accidental exposure, the entire community will immediately be at risk. Thousands of individuals, many of them children, will be exposed within minutes.

- What measures of emergency preparedness have been undertaken outside of the facility?
- How are these emergency measures being communicated to the community?
- How quickly will emergency measures be enacted?
- What plans and interventions are available and is the school and community adequately represented with emergency medical supplies?
- Have teachers staff and parents been briefed on symptoms & treatments for poisoning in event of an accident?

Concern for human health re: Information transparency & community communication

I have heard anecdotal information on two events which I would like more information about.

1. I request information on a contamination event which took place on Albert Street & required clean-up crews to work for nearly a week in hazmat suits. No communication was provided to the community about the nature of this event or the level of danger which is presented.
2. I request information on an event in which a teenager was treated at a local hospital after spending time on the grounds of the Prince of Wales school.

Concern for economy & public perception:

Peterborough is a wonderful place to live. We have a vibrant downtown with many independent retail shops, professional buildings, municipal buildings, parks, a waterfront & plenty of restaurants. This is a desirable place to live and to visit. Public perception is essential for the health of this city's economy. Students provide a much needed boost to our economy, spending money at these restaurants, bars & shops. Parents will not send their children to Trent University or Sir Sanford Fleming College if they think this area is contaminated, dirty, dangerous.

Real estate in Peterborough has been on an upswing for the last several years – affordable houses in a bustling city is a rarity, and many people see the value of investing in Peterborough property as a result. Property values cannot and will not continue to grow if Peterborough's reputation is sullied by a nuclear contamination or the risk of nuclear contamination. It doesn't take much to damage a reputation, regardless of whether or not a contamination event has occurred.

Our downtown is within the 2km radius of this proposed facility. It is rare to have a vibrant downtown in the face of big box investment. Peterborough has somehow managed to have both – conveniences provided by big box stores & a thriving downtown. The risk of damage to business due to either an accidental exposure or damage to the reputation of this city is very real. This affects not only current property owners in Peterborough but also the likelihood of future investment, both individual & corporate.

Concern re: Business Plan for License Application

- No business plan made publically available - we need more specifics before license can be granted
- No guarantee of new jobs, city revenue, or emergency funding – we need more specifics before license can be granted

Concern for Pelleting Application re: Unnecessary

If, as BWXT claims, there is no plan to pellet in Peterborough, there is absolutely no need for this portion of their application to be granted. If they truly do plan to continue at the Toronto site, you should not approve the pelleting license for the Peterborough site. BWXT themselves claim that there is no need, as they do not plan to pellet in this area. If there is no need & no plan, no license should be granted. If BWXT's claims are true, they should not have requested the pelleting for Peterborough in the first place.

Summary

To summarize, I strongly oppose BWXT to be allowed to start pelleting in Peterborough and I am strongly opposed to its license being extended by 10 years. I already am very concerned by the contamination that occurred at the GE plant before BWXT moved in. Nothing that BWXT has said or done has convinced me that they are ready or able to deal with a major chemical or radioactive spill.

I request that the CNSC deny both the license expansion and extension. The BWXT plant in Peterborough is:

- too close to our downtown
- too close to an elementary school
- too close to a neighbourhood
- too dangerous for children
- a danger to property value, investment & the economy of Peterborough
- unique & has dangerous, historical issues which have not been sufficiently addressed

The BWXT license application is:

- not transparent enough community communication
- premature, not sufficiently researched, & unsupported by a clear business plan

It is also premature to say that an adequate plan for the protection environment has been made, especially with the lack of data, transparency & clarity from BWXT.

Sincerely,

Lara George