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**Written submission from
Mary Garvey**

**Mémoire de
Mary Garvey**

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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January 26, 2020

Senior Tribunal Officer, Secretariat

Canadian Nuclear Safety Commission

280 Slater Street, P.O. Box 1046, Station B

Ottawa, Ontario K1P 5S9

RE: Intervention by Mary Garvey for the BWXT Licence Renewal (Hearing Ref. 2020 - H - 01)

To whom it may concern:

I write to you with grave concerns regarding the licence renewal application submitted by BWXT NEC. As you are aware, the current operating licence issued by the Canadian Safety Commission (CNSC) authorizes BWXT NEC to produce natural and depleted uranium dioxide pellets in Toronto at 1025 Lansdowne Ave., and to produce fuel bundles in Peterborough at 1160 Monaghan Rd. Modification of BWXT NEC's licence to permit uranium dioxide dust to be received and handled in a residential neighbourhood of Peterborough, Ontario, across the street from an elementary school, would be irresponsible.

In their 2018 Compliance Report, BWXT NEC has reported that the processing of uranium dioxide in Toronto has resulted in radioactive material to be released into the air and water. Specialists such as Dr. Gordon Edwards of the Canadian Coalition for Nuclear Responsibility report that the primary hazard from uranium dust is inhalation or ingestion of alpha radiation. Another expert, Dr. Helen Caldicott, also testifies that "if you happen to inhale a particle of uranium into your lungs, you get a very high dose to a very small volume of cells, which can induce cancer." It is evident that there is no safe dose of uranium dioxide. To introduce this risk in an urban centre and residential area of Peterborough would be illogical, archaic, and reckless. The release of radioactive materials into the water or air should not be allowed at any level in residential areas.

Experts report that there is no other jurisdiction in the world where uranium pelleting is permitted in residential neighbourhoods, except for the Fukushima Nuclear Facility in Japan where nuclear regulator oversight led to nuclear disaster. In 2018, BWXT NEC was awarded a \$168-million, five-year contract extension with Ontario Power Generation. Evidently, BWXT NEC is a highly profitable company that can afford to find a non-residential location to process uranium dioxide dust.

I trust that these concerns will be strongly considered. On behalf of the hundreds of children that will be put at risk, I recommend that BWXT's licence renewal application to allow uranium pelleting in Peterborough be rejected.

Thank you,

Mary Garvey

████████████████████, Peterborough, ON ██████████

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