



Oral Presentation

Exposé oral

**Written submission from
Lainey Bates**

**Mémoire de
Lainey Bates**

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*

January 26, 2020

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

Sent by email cncs.interventions.ccsn@canada.ca

RE: BWXT Nuclear Energy Canada's application to renew its operating license FFOL-3620.1/2020
BWXT License Renewal (Hearing Ref. 2020 - H - 01)

To whom it may concern:

I, Lainey Bates, resident in the area adjacent to the BWXT facility, request to intervene both in writing and by oral presentation in the hearing in the above-referenced matter at Peterborough.

After reviewing the application renewal to the CNSC signed December 20, 2019, I have many objections and even more questions that I need to have answered before I can support any granting of license renewal or expansions of the current license.

First and foremost, the location of this facility needs to be reconsidered. The fact that the former GE plant has been an industrial site since 1892 does not make it an appropriate site for such operations almost 130 years later.

I live 850 m from the BWXT, in a neighbourhood of hundreds of young families, and our children play in the playground that is only 400 m away. Worse, the elementary school that my children attend with 450 other youngsters is only 170 m away. The Kindergarten play yard, filled with about 100 boys and girls between the ages of 3 and 5, is even closer than that.

Here are just a few of the problems with this location:

- **Emissions from the plant** – Should the environmental controls fail or be less than safe, there is no safe distance to allow for error. Placed at the centre of the city, the long term health consequences would be felt by tens of thousands of residents.
- **Potential spills** – Our city floods. If there is a natural event such as a flood, there is no guarantee that dangerous materials will not spill into the streets, and end up polluting a green space used by some of the most vulnerable people in our community, the very young.
- **Accidents** – In order to move uranium dust and other toxic substances to the BWXT site, trucks will have to drive through a very busy commercial area and many residential streets. An accident involving a BWXT truck carrying these substances would be extremely dangerous.

- **Explosions** – BWXT already stores a tank of hydrogen at its Toronto site as it is necessary for the pelleting process, and if the license is expanded to include pelleting in Peterborough, one can assume that hydrogen will be needed here also. While those who use and work with hydrogen are trained and confident in their ability to handle it safely, even with all available safety precautions, accidents happen. An explosion such as the one in this article, a mere 150 m from a yard full of 3-5 year olds, would be a catastrophe.
 - <https://www.powermag.com/lessons-learned-from-a-hydrogen-explosion/?pagenum=1>

Maintaining safe operations is the responsibility of BWXT, as is developing and communicating emergency response plans to those who will need to implement them. The following quote is from page 3 of the BWXT Annual Compliance Monitoring Report January 1 - December 31, 2018:

“Established emergency response plans are in place that describe the actions to be taken to minimize health and environmental hazards, which may result from fires, explosions, or the release of hazardous materials. This includes effects to the local area and members of the public. The plans intend to reduce the risk of emergencies such as fires, and assist emergency staff and plant personnel in understanding key emergency response issues, and assist the facilities in protecting employees, the local community and the environment through sound emergency management practices. The emergency response plans were developed in accordance with federal laws and standards as follows and fulfils the CNSC operating licence requirements.”

As a parent of 2 students at the adjacent elementary school, Prince of Wales, I have received **absolutely no communication** whatsoever from BWXT about any emergency preparedness or environmental protection plans. As an employee of Kawartha Pine Ridge District School Board, and a teacher who often works at Prince of Wales Public School, I have received **absolutely no communication** whatsoever from BWXT about any emergency preparedness or environmental protection plans. I have spoken to teachers and staff at the school to confirm this. How is this possible given the above quote from BWXT’s own compliance report?

In this day when young students are drilled in emergency plans to protect them from fires within the building (causing them to evacuate into the yard), and from hostile and armed intruders within the building (causing them to hide in darkened classrooms in ‘lock down’), how is it possible that this company has not reached out to their neighbours to communicate what to do in the event of an emergency at BWXT?

The GE industrial site has been an important economic fixture in our city’s history, however it has also left this community with a legacy of illness, pollution, and a deep-seated distrust of the ability and willingness of private industry to put our safety and health first. BWXT, since moving into the site, has done no better in terms of being transparent and taking steps to provide information to the community.

With this letter, I ask that the request submitted by BWXT to renew its license be denied for the reason that this type of industry, with its inherent risks and history of accidents and illness, cannot

guarantee the safety of my family and my community, nor has the company BWXT made sufficient effort to attempt any emergency preparedness education for those who live and work nearby. Should the CNSC decide to renew the license, despite strong opposition from the public, then the license should be limited to 2 years, and it must not include the addition of the fabrication of pellets.

Sincerely,

Lainey Bates
Peterborough, Ontario