



**Written submission from
Katrina Behr**

**Mémoire de
Katrina Behr**

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 24, 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

To whom it may concern:

RE: BWXT Nuclear Energy Canada's application to license FFOL-3620.1/2020

I am writing this intervention regarding the license application of BWXT in Peterborough seeking "the flexibility to conduct pellet production." I am submitting this exclusively in writing.

I am writing to share my perspective as a teacher and the personal experiences I've had while having a close relationship with someone who lives within 500m of the BWXT plant. I would also like to highlight some stories that have been shared with me by members of the community surrounding BWXT, as many of these residents do not have the level of literacy and cultural capital necessary to participate in writing an intervention.

As you are aware, BWXT is located across the street from the elementary school Prince of Wales. BWXT is seeking permission to change their operations in Peterborough to include the production of uranium dioxide fuel pellets. Pelleting would significantly increase the release of uranium in the air (the Toronto plant released over 3000 times more uranium into the air than the Peterborough one according to the BWXT website). This release of uranium amounts to radioactive pollution. The scientific consensus is that there is no safe dose of radiation (The National Academy of Sciences). Additionally, children are extremely vulnerable to radiation. I have been informed that 64 out of 175 people who work at BWXT have cancer, which is alarmingly high. Given that reality, please consider the ways in which the children who attend Prince of Wales and BWXT employees differ. While many of these points are self-evident, the fact that pelletting is even being considered necessitates that they are explicitly iterated, so that they receive reflection:

- Unlike BWXT employees, these children did not choose to put themselves in proximity to radioactive emissions.
- Unlike BWXT employees, these children may not choose to leave the area if they assess that this proximity to radioactive emissions is no longer in their best interest.
- Unlike BWXT employees, these children are not equipped with the same level the knowledge and reasoning skills to make such an assessment
- Unlike BWXT employees, these children do not have access to the same level of resources to self-advocate in the event of an injustice
- Unlike BWXT employees, the vast majority of these children **do not get to leave** the site of radioactive pollution as their homes are also located within the zone of contamination.

In short, these children require the adults around them to make responsible decisions in order to ensure their well being. **Given the above, do you consider adding pelleting to the Peterborough location of BWXT to be a responsible decision?**

I would also like to make you aware that Prince of Wales school is among those which have created a school vegetable garden to teach children about the science of plants, environmental stewardship, and healthy lifestyles (you can see them featured here: <http://agardenineveryschool.ca/celebration/>). In addition to the school garden, an abundance of wild black raspberries grow along the west edge of the school property. As mentioned, the production of uranium pellets releases a greater amount of uranium dust into the surrounding air, water and soil. By allowing the production of pellets at the Peterborough location, BWXT is effectively poisoning food sources for the local community, which already finds itself at a socio-economic disadvantage. **Do you find this just?**

I personally was presented with the opportunity for a job at Prince of Wales, however my reservations about working so closely to a nuclear plant were a major factor in my rejection of the position for one that was less ideal for my circumstances and would result in a longer commute. While I understand that my personal strife is of little consequence, consider that, if other teachers feel the same as myself, **how might this impact the quality of education that the children attending Prince of Wales receive?**

I spoke with a man who's teenage son frequently enjoyed playing in the woods near Prince of Wales for years and has been admitted to the hospital for radiation exposure. Since nuclear plants such as BWXT emit radioactive pollution, **do you find this boy's situation to be a coincidence?**

I spoke with a woman who lives on nearby Albert St. who described how people in Hasmat suits were on her street for days with trucks and pumps and she was unable to get any information from the city or BWXT as to why? Considering that Nuclear plants release uranium into the sewer, **do you find this woman's situation to be a coincidence?**

The following are my recommendations

1. I recommend that pelleting **NOT** be authorized at the Peterborough facility of BWXT.
2. I recommend that the proposed license renewal of 10 years be reduced to 3 years for the Peterborough facility of BWXT.

Sincerely,

Katrina Behr
Peterborough, ON