



**Written submission from
Janet Harris**

**Mémoire de
Janet Harris**

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 24, 2020

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

To Whom It May Concern;

RE: Intervention for BWXT License Renewal (Hearing Ref. 2020 - H - 01)

Please consider this submission as an Intervention to the Canadian Nuclear Safety Commission (CNSC) with regards to the BWXT Nuclear Energy Canada Inc. application for a 10 year license renewal at the 1160 Monaghan Rd, Peterborough Ontario facility.

It is requested that the CNSC deny BWXT its 10 year license renewal and the ability to process nuclear pellets at the downtown Peterborough plant based on past, present and potential risks for human health, the environment and the local economy which directly impact citizens living in the City of Peterborough and surrounding area of the BWXT plant.

As a result of significant concerns raised among organizations including the Canadian Environmental Law Association (CELA)(1), residents of the City of Peterborough (2), and numerous additional references(3) , the following issues deem it imperative that the BWXT licence renewal application be denied until such time that health, environmental and socioeconomic risks are minimized with diligent and continuous effective communication with all stakeholders involved with regards to the licensing operations and nuclear pellet processing at the BWXT Peterborough site .

#1) **Health Risks** – As a resident who has lived within 1 km of the BWXT plant in Peterborough for the past 28 years, I was diagnosed with breast cancer in 2017. Both of my children went to school at Prince of Wales elementary school for 9 years. This school is located directly across the street from the BWXT plant. Significant health concerns from former GE Hitachi employees, school employees and residents living near the BWXT plant have been raised with regards to higher than average rates of cancer, respiratory illness and other health concerns. (4) In addition, air, water and soil quality in and surrounding the BWXT plant have had and potentially can have an effect on human health. Schools have been closed due to uranium exposure as recently as 2019 (5). Why wait until there is an accident? Why not minimize risk before it happens? Is it not unethical to potentially expose vulnerable population groups such as children, pregnant women, the elderly and plant workers to unknown and potentially significant negative health risks?

#2) **Environmental Concerns** – Land, including parking areas and empty lots surrounding the BWXT plant have been reported to be contaminated with toxic wastes from the former GE plant. Ground water and soil contamination are issues of concern. Growing and consuming vegetables in downtown has been questioned in terms of health risks by experts in environmental engineering (6). Emissions of beryllium into the air from BWXT are ongoing and are reported to be increasing with an emissions stack in close proximity to the junior end of a elementary school playground (7). Storage of hydrogen in large tanks as part of the nuclear pelleting process brings concern with regards to the potential explosive impact for the plant and surrounding area. Where is the evidence that an adequate, current environmental assessment has been completed and

communicated with the citizens of the City of Peterborough? Where is the Emergency Preparedness plan in case of an explosion or leak into the plant and surrounding area of potentially toxic chemicals such as beryllium and uranium?

#3) Social-Economic Concerns – If BWXT is allowed to bring the processing of nuclear pellets into the Peterborough plant there are concerns that the social stigma or negative perceptions associated with this processing will decrease property values and affect small business in areas near the plant in the downtown core. Why is there only 1 licence for 2 plants in Peterborough and Toronto with distinct differences in geographic location and history? Are the environmental and health risks not site specific to the area and type of facility processes? What about liability insurance for the citizens of Peterborough in case of an accident affecting human health or the environment? Whose responsibility is it to obtain and maintain liability insurance? Why should people living close to nuclear processing plants feel that they need to own Geiger counters? (8)

As a result of these issues and as a resident of the City of Peterborough, parent and cancer survivor, the following recommendations are listed given the concerns of myself, my family and the surrounding community regarding the potential risks associated with the submission of the BWXT 10 year licence renewal application:

Recommendations:

- 1) **Deny the BWXT licence renewal or at the very least limit the licence renewal to 1 year.**
Morally and ethically, based on significant concerns of past, present and future health, environmental and socio-economic risks a 10 year license renewal to BWXT should not be granted in the City of Peterborough at this time.
- 2) Conduct a thorough **health assessment** of past, present and potential human health risks in the City of Peterborough (eg cancer, respiratory illness) with regards to the former GE plant and present and future BWXT operations.
- 3) Conduct **environmental assessment** of past GE and present and future BWXT operations to begin immediately and for completion within 1 year. Include structural, present and future processing and surrounding area in terms of soil, air and water quality.
- 4) Demand an **Emergency preparedness** plan by BWXT and the City of Peterborough as soon as possible for completion within 6 months.
- 5) **Monitor future business planning by BWXT.** Processing of nuclear pelleting has no business in urban areas due to potential health environmental and socioeconomic risks. **Allow processing of nuclear pellets in rural or isolated areas only – out of urban, populated areas.**
- 6) **Enhance communication strategies** with the public and with residents living within the City of Peterborough and especially for those persons living within a 2km radius of the present BWXT plant. The CNSC and BWXT owe the citizens of Peterborough this strategy at the very minimum.

For the health of our citizens and especially those vulnerable populations – including the children of Peterborough - thank you for considering this intervention and these recommendations. We look forward to additional communication and your decision on this very important issue.

Sincerely;

Janet Harris

Peterborough, ON

- (1) <https://cela.ca/renewables-not-small-modular-nuclear-reactors-are-the-solution-to-climate-change/>
- (2) <https://www.nopellets.ca/petition>
- (3) <https://www.nopellets.ca/resources>
- (4) <https://www.psr.org/blog/resource/webinar-health-risks-of-nuclear-power/>
- (5) <https://www.nbcnews.com/news/us-news/frantic-parents-fear-kids-after-radioactive-contamination-found-ohio-middle-n1005771>
- (6) <https://www.mscdirect.com/betterMRO/safety/everything-you-need-know-about-osa-beryllium-compliance>
www.ncbi.nlm.nih.gov/pmc/articles/PMC2819790/
- (7) <https://www.mscdirect.com/betterMRO/safety/everything-you-need-know-about-osa-beryllium-compliance>
- (8) <https://www.ctvnews.ca/canada/nuclear-power-plant-alert-people-miffed-about-mistaken-notification-1.4763763>