



**Written submission from  
Erin Howley**

**Mémoire de  
Erin Howley**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**BWXT Nuclear Energy Canada Inc.,  
installations de Toronto et Peterborough**

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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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Canadian Nuclear Safety Commission  
280 Slater Street  
PO Box 1046, Station B  
Ottawa, ON K1P 5S9

January 26, 2020

RE: Notice of Public Hearing, Ref 2020-H-01

To Whom it May Concern:

I am a local resident who lives in proximity to the BWXT facility at 1025 Landsdowe Avenue, Toronto. I have reviewed the BWXT application for Renewal of Operating License. I am alarmed to learn that there are radiation doses being released to members of the public. Aside from the lack of public awareness and communication by city and government officials to residents about the release of radiation doses from the plant, I am extremely alarmed that any radiation release is permitted in a high density and high traffic residential neighborhood.

On page 29 of the BWXT application, under section 4.7.4: Challenges, "As radiation doses continue well below the regulatory dose limits, dose reductions become increasingly challenging. Workstation and shielding projects will continue into the next license period as opportunities are identified." This statement is alarming, in that BWXT admits that it will become increasingly difficult to reduce exposure. At the same time, there is no clear strategy in place for how doses will be regulated into the future as these challenges arise. This protocol is not clear, specific, or strategically planned. The allowance of any radiation doses in a neighborhood where residents do not agree to any baseline of industrial exposure is not acceptable. The fact that there is no clear plan in place to address the likely increase of exposure is reprehensible.

Families in the neighbourhood have reported cases of terminal and chronic illnesses. No parent should worry about radiation exposure of their baby or future child when it is impossible leave their own home or neighborhood. No adult or elderly person should have to live with the anxiety of not knowing how the BWXT plant is affecting their health and even life.

No rationale for a 'safe' radiation amount is acceptable, when doctors express grave concern about worker and environmental exposure. Even extremely small amounts of these particles when inhaled or ingested can do major damage to DNA, especially in women, babies and fetuses. Studies are still being done on the impacts of these particles; the effects may not be detected for more than a generation. The story is larger and deeper than any annual or decade-long exposure report of the kind used to give rationale to this renewed license. BWXT cannot make claims on or assure that these kinds of damage won't happen, or are not already accumulating. Even more so when there is no assurance of future risks to the facility. We as residents, who live next to and in proximity to this plant, those of us who are closest and most affected, *do not agree or condone* the renewal of the BWXT operating license. Our statements of extreme concern, anxiety and alarm are real and felt. Given the the facts listed within the operating license application and contextual research, we do not find the continued operation of this facility in our neighborhood to be safe.

Sincerely,

Erin Howley

Toronto ON