



CMD 26-M13.14

Date: 2026-04-17

**Written Submission from
Pete Woolidge**

**Mémoire de
Pete Woolidge**

In the matter of the

À l'égard de la

**Mid-term update from BWXT Nuclear
Energy Canada Inc. on licensed activities
at its Toronto and Peterborough facilities**

**Mise à jour de mi-parcours sur les
activités autorisées de BWXT Nuclear
Energy Canada Inc. à ses installations de
Toronto et de Peterborough**

Commission Meeting

Réunion de la Commission

May 2026

Mai 2026

April 17, 2026

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

Sent by email interventions@cnsccsn.gc.ca

Intervention by Pete Woolidge for the BWXT Licence Renewal (Hearing Ref. 2026 - M - 13 Rev. 1)

To whom it may concern:

Pete Woolidge requests to intervene in the hearing in the above-referenced matter at Peterborough.

By this letter, and pursuant to the CNSC's *Rules of Procedure* ("Rules"), Pete Woolidge requests status to participate as an intervenor in the public hearing and an opportunity to present oral submissions.

Please also find attached our submission to the Canadian Nuclear Safety Commission regarding the licence renewal of the BWXT facilities.

Sincerely,

Pete Woolidge

April 17, 2026

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

Dear Sir or Madam:

RE: BWXT Licence Renewal Application to Request that they be permitted to conduct the process of pelleting.

This letter is to voice my opposition to the allowance of the operation of pelleting at the BWXT plant that is centrally located in Peterborough, Ontario. I believe that allowing such an operation would be highly irresponsible as it puts the entire city at unnecessary risk of catastrophic events. My concerns of security will be addressed in the categories: BWXT's Safety History, BWXT's Security History, Risks of Damage Due to Extreme Weather Events and Risks of Sabotage to the Facility.

I am in opposition to the allowance of pelleting at BWXT in Peterborough - a plant that is closely surrounded by residential neighbourhoods and a mere 25 meters away from an elementary school. This, in my opinion, is highly irresponsible due to its putting Peterborough at risk of catastrophic incidents at the BWXT site caused by weather events or sabotage.

BWXT's Safety History

I found the following incidents and activities listed on the site called wise-uranium.org that were addressed by the US Nuclear Regulatory Commission (NRC).

No less than twenty violations of criticality safety procedures and five safety violations at the BWXT Lynchburg nuclear fuel plant between February, 2004 and March 2019. One of these involved an "unplanned fire".¹

At the same plant on July 15, 2009 there was an accidental discharge of highly enriched uranium. Two hours had passed before the BWXT employees declared the emergency.¹

The NRC cited BWXT at the Lynchburg plant for "inoperable criticality monitors" from April 6 through May 17, 2003.¹ Six detectors had failed.

Babcock and Wilcox (the B and W of BWXT) was sued for design flaws of the failed Three Mile Island Power Plant.

BWXT's Security History

A glaring example of incompetence was well demonstrated at BWXT's Y-12 facility at Oak Ridge, Tennessee. On July 29, 2012 three religious activists (one being 82 year old nun, Sister Megan Rice) broke into the center of this compound and spray-painted their message of peace on the side of a warehouse containing enough weapons-grade uranium to build thousands of weapons. They penetrated the facility's 4 fences using bolt cutters and a flashlight. They then used a sledge hammer to pound the side of the building. It took several hours before they were apprehended by security. This "was supposed to be the most tightly secured uranium processing and storage facility in the country."² The trio managed their feat because sensors and cameras had not been repaired. At that time it was Babcock and Wilcox (of BWXT) who were responsible for maintenance of security equipment at the Y-12 site.

Also, Babcock and Wilcox had reported for a cheaper design for their Highly Enriched Uranium Facility resulting in "a more vulnerable above ground building".³

Risks of Damage due to Storms

Within the last 25 years Peterborough has experienced 2 exceptional floods - harbingers of climate change. In 2022 swaths of Ontario including Peterborough experienced a derecho which caused extensive damage. We've experienced a couple of ice storms in the past five years as well. Extreme weather events are becoming more frequent. This includes tornadoes - especially in Ontario, now the province experiencing the most per year. Tornadoes can tear down a brick facade with ease.

Risks of Sabotage

Hydrogen gas is required in the pelleting process. The tank of hydrogen at BWXT in Toronto contains an immense amount of hydrogen which we know is very explosive. Hundreds of hydrogen incidents have occurred (including at BWXT Toronto in January, 2017) many of which have been devastating. Hanau, Frankfurt, Germany in 1991 had a major incident involving a hydrogen tank rupture. "The explosion resulted in severe damage within a radius of 1 km."⁴

Uranium dioxide powder can be “pyrophoric or oxidize rapidly even at room temperatures when in very fine powder form”.⁵ A pyrophoric substance is one that spontaneously ignites within five minutes of coming into contact with air. There had already been several occurrences of uranium oxide fires at licensed fuel-fabrication facilities when one was reported on February 21, 1992 by the United States Nuclear Regulatory Commission. It read: “The cause of the fire is believed to be the oxidation of the calciner drop powder consisting principally of uranium dioxide (UO₂),”.⁵ And later “In other incidents, dating back to 1977, several fires involving calciner discharge lines and at least one involving a hammermill hood have been reported. In all cases, the oxidizing uranium powder was believed to be the source of ignition, and combustible materials, such as transfer hoses and boots, provided the fuel.”.⁵

Another incident demonstrating uranium powder’s ability to ignite occurred at the Y-12 facility in February of 2003 when a “small explosion breached its glovebox, allowing air to enter and ignite some loose uranium powder.”.⁶ BWXT Y-12 was fined \$82,500 for this.

While “the possibility that civil nuclear-energy facilities might become targets for terrorists has been recognized since long before the attacks on September 11, 2001”⁷ we now have a geopolitical climate at its most dangerous state in decades. As far back as September, 1980 during the Iran-Iraq conflict the Iranian Air Force did an air strike on the Al Tuwaitha nuclear complex in Iraq. The main draw of these “facilities as terrorists targets lies in the potential for creating a release of radioactivity large enough to produce significant casualties and land contamination.”.⁷ “With U.S. and Israeli forces continuing strikes on Iran, federal counterterrorism authorities are warning that the desperate theocracy could launch retaliatory strikes on American soil using sleeper cells, affiliated Iranian terrorists groups, lone wolf sympathizers or targeted cyberattacks.”.⁸

In the interest of the citizens of Peterborough I believe that pelleting should not be located within the city considering the risk of radioactive contamination caused by potential extreme weather and sabotage.

In the words of investigative reporter and author, Eric Schlosser, “our ability to create dangerous things exceeds our ability to control them”.⁹

I am requesting that this licence renewal allowing pelleting in Peterborough not be allowed.

Sincerely,

Pete Woolidge

Bibliography

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How the next US nuclear accident could happen, by Hugh Gusterson, June 30, 2015
4. Safety Considerations on Hydrogen, Karl Verfondern, 2008
5. United States Nuclear Regulatory Commission, Information Notice No. 92-14:
Uranium Oxide Fires at Fuel Cycle Facilities, February 21, 1992
6. Parson P (2004-06-11). BWXT Y-12 Fined for explosion, The Oak Ridger
7. National Academy of Sciences, Engineering and Medicine, Threats to Civil Nuclear-energy
Facilities, by John P; Holden
8. L.A. Times, Iran, threats on U.S. soil: sleeper cells, lone wolves, cyberattacks and eerie
numbers code, by Richard Winston
9. The Guardian, Sat. 21 Sept., 2013 (Interview with Ed Pilkington)