



**CMD 26-M13.40A**

Date: 2026-05-15

## **Supplementary Information**

## **Renseignement supplémentaire**

### **Presentation from Peter Harris**

### **Présentation de Peter Harris**

In the matter of the

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À l'égard de la

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**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**

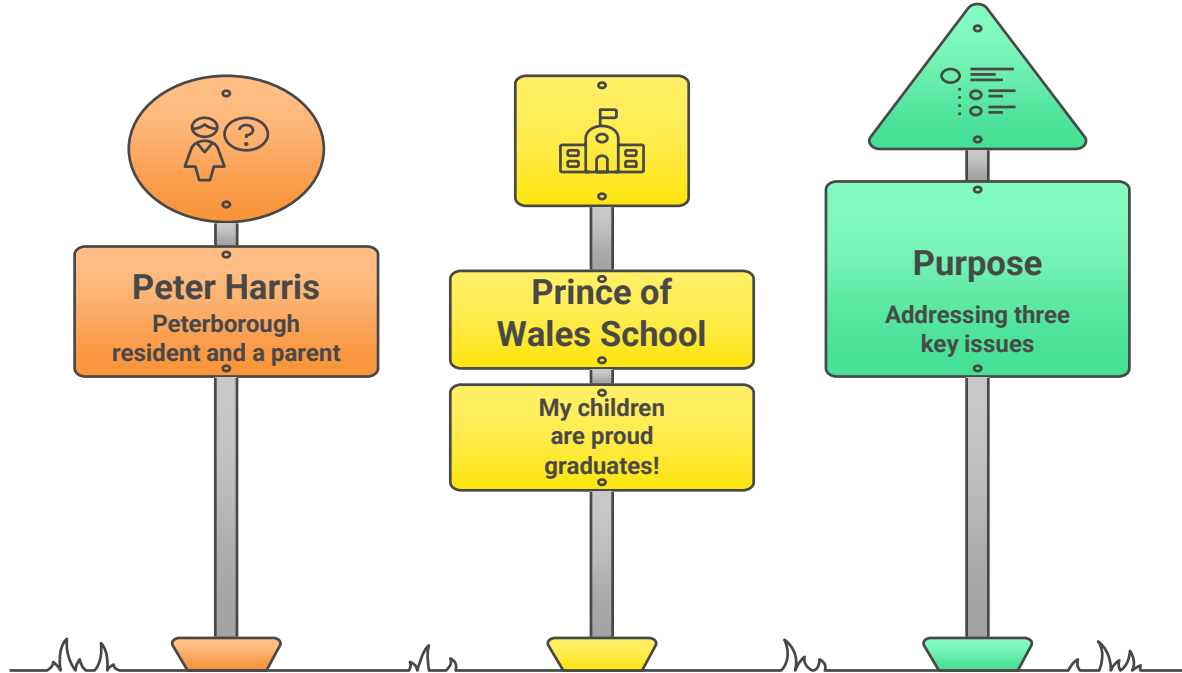
**Commission Meeting**

**Réunion de la Commission**

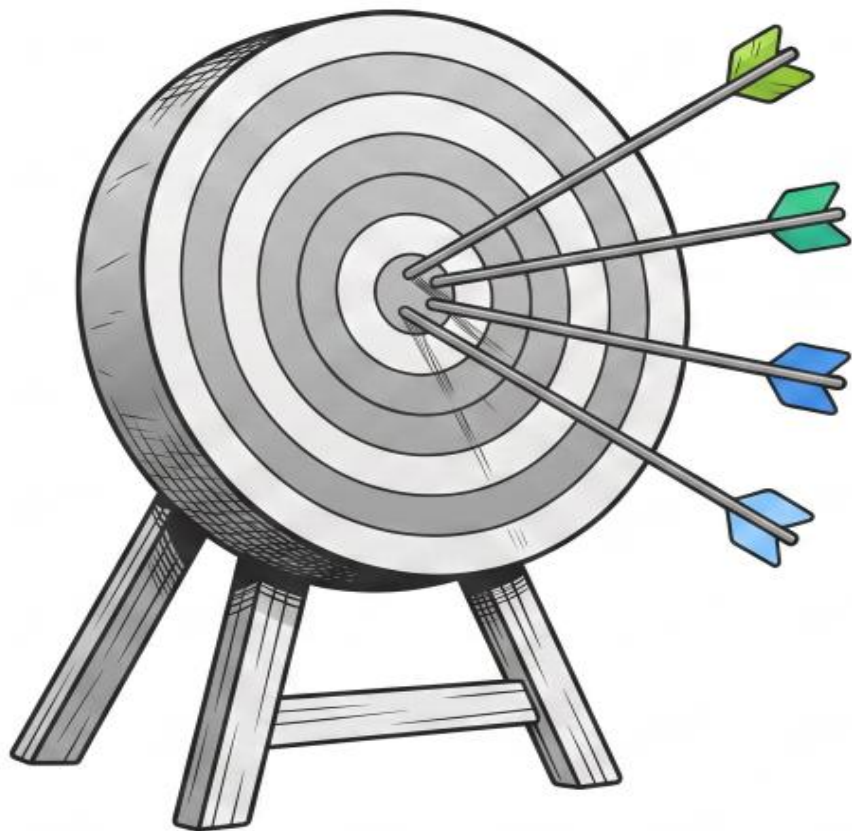
May 2026

Mai 2026

# Why Am I Here?



# Considerations



## Nuclear Safety

The ultimate goal of all safety measures



## Justification vs Reasonableness

Ethical considerations in decision-making



## Beryllium Emissions

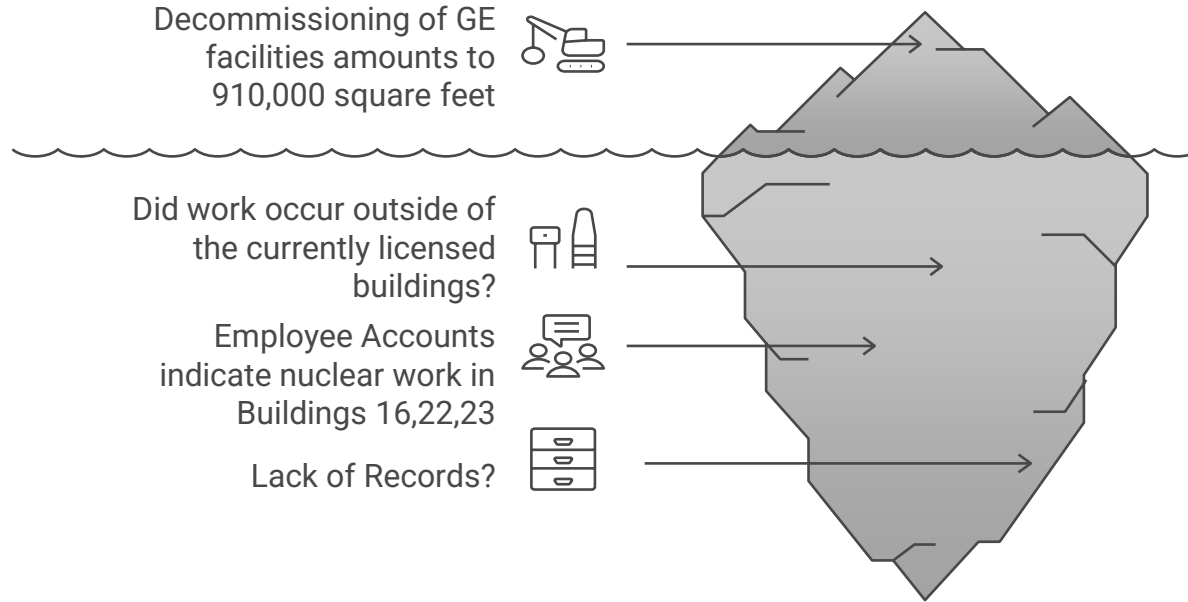
Emissions of beryllium need to be monitored in a manner that reflects the risks and to ensure rapid response when problems are encountered.

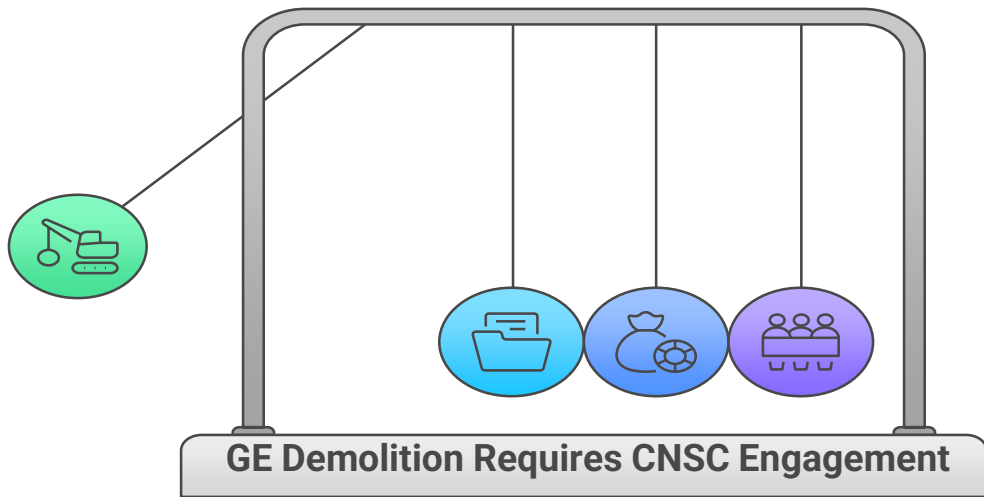


## Decommissioning and Historical Records

Ensuring safe demolition of the GE "campus"

## GE Vernova's Decommissioning - Where were early nuclear materials processed?





**Determine  
Historical  
Activity**

Historical activities  
should be  
documented as  
required by Regdoc  
2.11:2

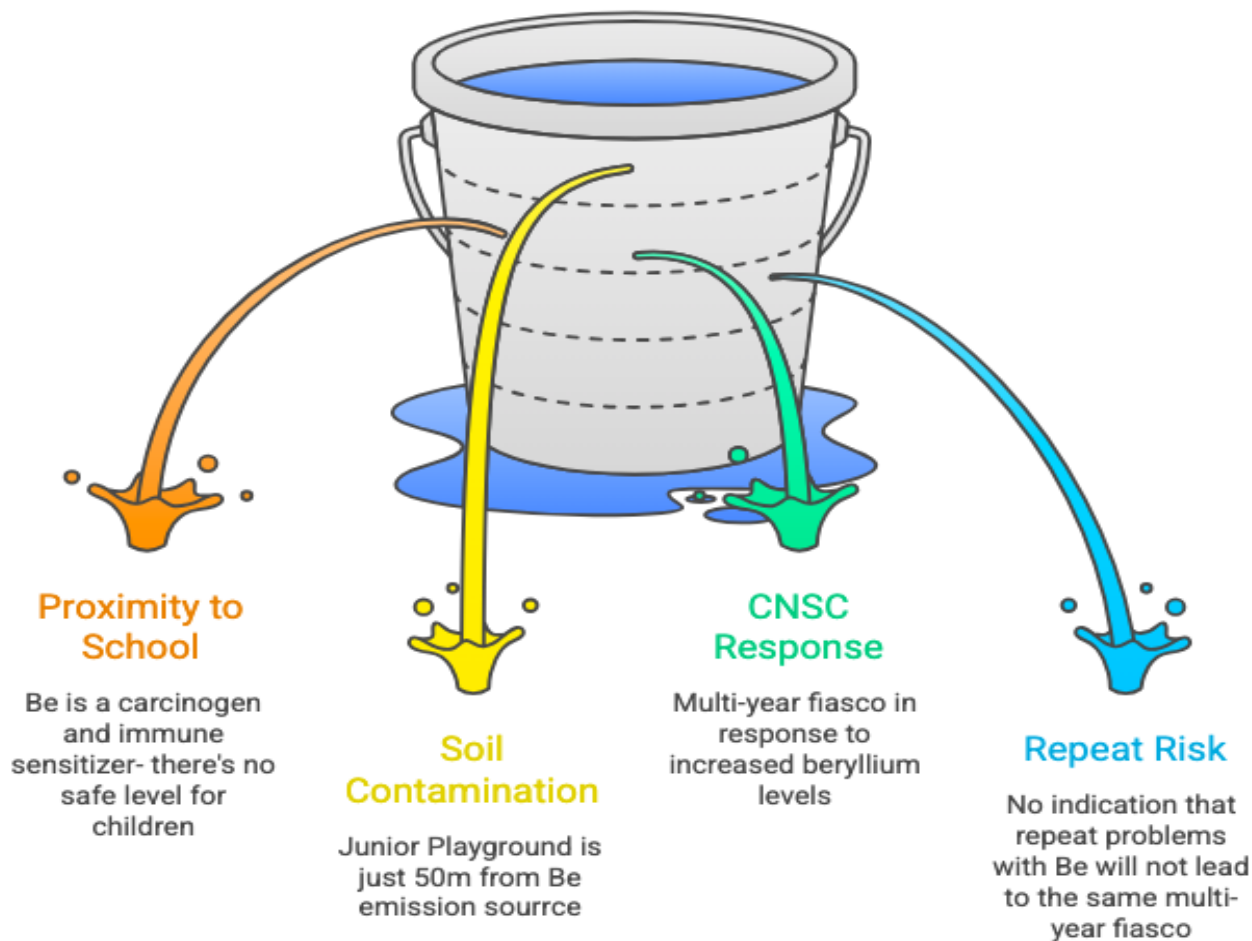
**Financial  
Guarantees**

Explain why  
financial guarantees  
are not  
being employed for  
decommissioning

**Public  
Engagement**

As required by  
Regdoc 2.11:2,  
consult the public

# Beryllium Threat to School Children



# IEMP Monitoring Challenges

## Limited Data

Insufficient data points collected



## Inconsistent Methods

Inconsistent methods and units used



## Unmet Direction

Commission's directive for "robust" monitoring not realized



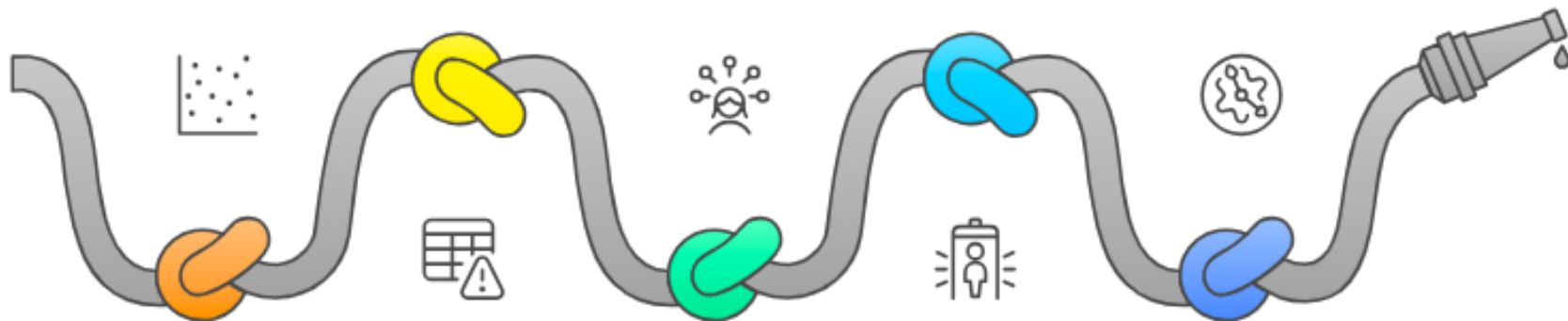
## Retroactive Errors

Errors assigned after concerns

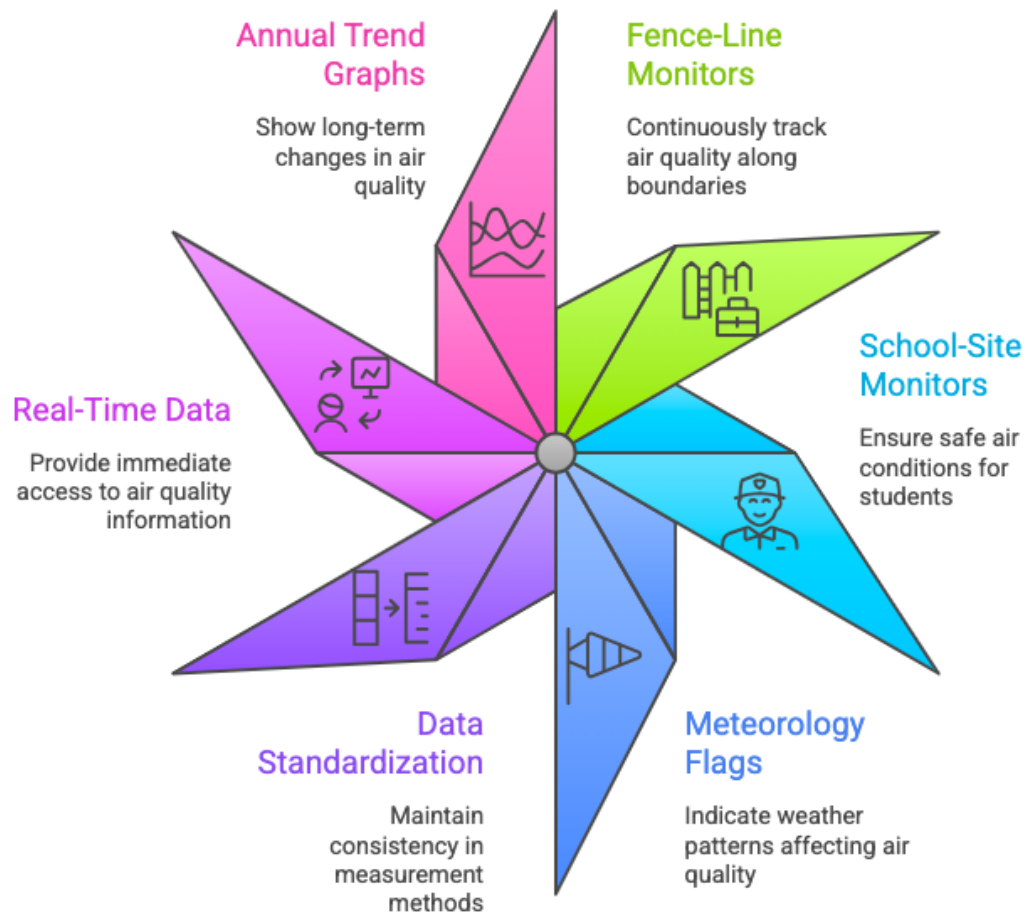


## High Detection Limits

Consultant ND due to high MDL



# Comprehensive Air Monitoring Appropriate for Location





# The CNSC and Justification



## Justification Principle

The core principle that radiation exposure must have a net positive benefit.



## Vulnerability of Children

The heightened biological and social vulnerability of children to radiation.



## International Consensus

The global agreement on the importance of justification in radiation protection.



## CNSC's Internal Opposition

The internal dissent within the CNSC to an unjustified expansion of BWXT's license



## IAEA's Criticism

The IAEA's critique of Canada's weak, non-systemic implementation of justification.

## What is Reasonable?



"While the Court may consider that the wisdom of expanding an industrial operation involving nuclear materials in the immediate vicinity of a primary school is dubious, that is not the question before it to determine." Justice Richard Mosely

## Summary of Recommendations



### Historical Activities

Research and disclose historical nuclear activities, align demolition with REGDOC-2.11.2, and engage the public.

Implement continuous, independent Be monitoring with real-time data. Monitor environmental conditions and align manufacturing processes with environmental conditions.

### Continuous Monitoring



### Justification Test

Require an explicit, recorded justification test and child-focused dose constraints. Lobby to change the NSCA.

Encourage alternative siting to reduce risks.

### Alternative Siting

