



**CMD 26-M13.44**

Date: 2026-04-17

**Written Submission from  
Mark Achbar**

**Mémoire de  
Mark Achbar**

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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

## **Written Submission**

### **Re: Intervention — BWXT Peterborough Midterm Review**

I am writing to submit my intervention for the CNSC's midterm review of the BWXT Peterborough facility license. I will not be attending the May 26 hearing in person or online, but I ask that this written submission be entered into the record.

Six years ago, BWXT — an American multinational heavily involved in the nuclear weapons industry — applied to expand its nuclear license to include the processing of uranium dioxide powder into pellets in downtown Peterborough, just 25m from Prince of Wales Public School. Concerned Peterborough citizens rightfully responded to this application with a record setting number of CNSC interventions to express widespread concern.

In making its decision to allow an expanded Peterborough license, the CNSC ignored what motivated this outpouring of stakeholder concern — that increases in radiation exposure to the vulnerable could not be justified. The decision broke fundamental rules of radiation safety that the CNSC is obliged to follow under international treaty.

Many if not most of the issues that intervenors raised in 2019 have not been adequately addressed by the CNSC. For example:

- Exposing children to increased levels of radiation — no matter the size of the exposure — cannot be justified.
- Unanswered questions about beryllium releases at this facility.
- Questions about multifactorial toxin exposures together with increased radiation exposures from pelleting have been compounded by the proposed demolition of GE's heavily contaminated buildings.

As CNSC member Sandor Demeter wrote in his dissent: "Moving the pelleting operations, adding radiation doses and UO<sub>2</sub> air and effluent emissions in a site which has an adjacent vulnerable population, is not acting in an abundance of precaution."

I agree. I ask the Commission to apply the precautionary principle and the ALARA principle — basic safety obligations embedded in the Nuclear Safety and Control Act — and to revisit the 2020 licensing decision accordingly.

Respectfully,

Mark Achbar