



**Written submission from
Roy Brady**

**Mémoire de
Roy Brady**

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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Filed on January 27, 2020

I am making a written submission and not requesting oral intervention at the hearing.

Shocking for residents of Peterborough, the extension of a nuclear operation in a residential area for BWXT is dangerous, and also very foolhardy. Why! - there is an elementary school, Prince of Wales, across the street where children attend and play regularly.

Children always need to be protected. Even the slight risk of toxin release and small doses of radiation is too great for exposure to children whose bodies and cell development are still in growth stage. Their promising future could be at risk through no fault of their own and without any representation of their interests. Children are residents of the neighbourhood, but also students for at least 185 annual days of their lives. Zoning to allow such a plant, originally for General Electric, was permitted over a century ago (when women could not vote, and health and safety protections were minimal).

Within 2 km of BWXT operations are: 25 000 residents, 8 elementary schools, 2 secondary schools, the community hospital, 6 retirement residences, the toboggan hill behind Prince of Wales Elementary School, a huge mall, several outdoor sports facilities, 38 municipal parks, all of downtown Peterborough. Some of these spots are under one km away.

At the CNSC open house in Peterborough on January 23, a participant inquired about the uneasy location of BWXT in regards to an expansion of a nuclear operation across from an elementary school. The CNSC representative stated that location is not within the jurisdiction of CNSC. It 'is' within the jurisdiction of the Regulator when health and safety of residents are involved.

Nine years ago GE-Hitachi, in the same location, applied to CNSC to add the use of low enriched uranium fuel to their operations. This was scary and brought on angry complaints to City Hall, GE-Hitachi and CNSC. At the hearing in Ottawa, December 2010, concerns were presented by six intervenors, including myself, to the panel. One panel member, Alan Graham, inquired if GE-Hitachi really needed to add the use of low enriched uranium at its plant, given the concerns; whereupon GE-Hitachi withdrew that proposal and stuck with just the license extension. This was a sound decision which should be repeated by BWXT regarding its current application.

For another reason the location of the plant is a serious concern for Peterborough. I expect that you have followed the history of General Electric and the explosion of cancer cases among its employees. The recent documentary "Town of Widows" needs to be viewed by all involved with the application from BWXT. The horrible developments, covered thoroughly by the Toronto Star, have been traumatic for many residents in Peterborough, who do not need further trauma and apprehension.

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CONCLUSION

BWXT has requested the “flexibility” to move all their pelleting manufacturing from Toronto to Peterborough. This is blatantly a request for a Blank Cheque if CNSC agrees to such an uncertainty involving a nuclear site in a residential area where many children live and attend school. A Regulator should ‘protect people’ and not just investors and profits.

CNSC cannot permit an additional nuclear operation at the BWXT plant in Peterborough, given the residential and human factors I have outlined.

Please indicate that you have received this submission.

Roy Brady,

Peterborough ON