



Oral Presentation

Exposé oral

**Written submission from
Janice Keil**

**Mémoire de
Janice Keil**

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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laissée en blanc*

From: Janice Keil
Sent: January 27, 2020 4:51 PM
To: Interventions (CNSC/CCSN)
Cc: maryam.monsef@parl.gc.ca; Dave Smithco; minister.mecp@ontario.ca; jonathan.wilkinson@parl.gc.ca; dtherrien@peterborough.ca; kakapo@peterborough.ca; dpappas@peterborough.ca
Subject: BWXT application for uranium pelleting Peterborough

Note: Request for both a written submission and an oral presentation at the Board hearings in Peterborough, Ontario March 2020

To whom it may concern at the Canadian Nuclear Safety Association:

As a resident of Peterborough and a teacher-health and safety advocate, I am extremely concerned about BWXT's application to do uranium pelleting in this city, the fastest growing municipality in the country according to the most recent Stats Can data. Peterborough wants to welcome young families, seniors, university and college-aged youth among others to join its community and people are coming but what they don't realize is that if this application is approved, they will be moving to one of the most dangerous, unhealthy and unsafe places in this country.

Unlike the BWXT facility in Toronto in the industrial Landsdowne-Dupont area (I was just there three days ago), the Peterborough site is situated very close to the urban downtown core, surrounded by residential areas and most significantly, right across the road from an elementary school, Prince of Wales. In contrast, the Toronto site is kilometres away from any educational facility.

Phone calls to both the Ministry of Education Regional Field Office and the Ministry of Environment last week revealed that BWXT has to meet the provincial standards for the recommended minimum separation distance for a class industrial facility (Policy D-6 Compatibility between Industrial Facilities, Sections 4.11 and 4.3). This policy was last updated March 22, 2019 so thus is enforced by the present provincial government. Of the three classes, the CNSA staff at the Open House in Peterborough January 23, 2020, refused to divulge what class of industrial facility BWXT in the former GE-Hitachi site would fall into. However, according to the four main criteria (production volumes, intensity and scheduling of operations, physical size of plant and the probability level of fugitive emissions), it appears that BWXT would be Class III. According to the Ontario Ministry of Environment policy, a Class III industrial facility **must have a separation distance of 300 m with a 1000 m potential influence area.** The Prince of Wales schoolyard is at most 40 m from the building smokestack on Monaghan Road. 40 m does not even meet the Class II requirements which has as a minimum a setback of 70 meters.

Thus, if one is using the minimum separation distance as a factor in license applications, the BWXT facility should not be able to exist at all. The argument made that this site was grandfathered over from GE when setback requirements were not enforced or non-existent cannot be held as valid reasoning in the consideration of the granting of a new license to do uranium pelleting. **That decision to be determined at the 2020 hearing has to comply with the present provincial standards. BWXT fails to meet those standards.**

The lack of compliance with provincially mandated separation distances does not even take into account the **sensitive land uses**, ie. buildings or associated amenity areas not directly associated with industrial use. In this policy, schools are front and centre to dictate proper setbacks where “humans or the natural environment may be adversely affected by emissions” (section 1.2.1).

The only conclusion that can be drawn from this flagrant abuse of provincial standards is that both BWXT and the City of Peterborough City Council that overwhelmingly voted for this **do not care about the health and safety of our future generations and those living today**. Perhaps this is simply confirmation of what we in Peterborough have been told: the GE site is already heavily contaminated so why does more contamination matter? Many are already severely ill or have died in this city from the toxic legacy of GE. What difference will more illness and deaths mean?

The CNSA Open House in Peterborough January 23, 2020 which I attended was most illuminating in this regard. There were almost as many CNSA staff as Peterborough citizens in the audience and the atmosphere in the room at the Holiday Inn could only be described as one of control and stonewalling on the part of the CNSA. Even before I asked my question, just even putting my hand up standing at the back of the room elicited the intimidating response on the part of one of the city policemen present (Officer Chartier): he immediately came up and stood five feet behind me and just stared at me the entire time. When citizens asked questions the CNSA staff did not want to answer, that possibility of a public discussion was shut down. The subsequent one-on-one I had with one of the inspectors that had visited Peterborough on several occasions brought forth the comment from him that we in Peterborough are “civilized” (nice and quiet) compared to those in Toronto. As he described the level of “hostility” and challenging attitudes demonstrated by those at the latter open house the evening before, the sense given is that Peterborough is, according to the CNSA, an easy push over as we are supposedly uninformed, uneducated and a historically ‘workers’ town.

This patronizing and demeaning attitude shown to many of us in Peterborough who are very well informed with the facts is unacceptable and disgusting. We know that the 2 km radius around the BWXT plant where the uranium dust levels will be highest will encompass the entire downtown area and the apartment building that I live in as well as the Prince of Wales school across the road where the kids deserve to play and learn without fear that they will be most highly exposed to the radioactive dust than anyone else.

This licensing application renewal to bring uranium pelleting to Peterborough must be denied by the CNSA. Otherwise, this city that is growing faster than any other will be the dead zone everyone fears. We in Canada have the opportunity to avoid another Port Hope disaster. It will be up to you at the Canadian Nuclear Safety Association to decide.

Sincerely yours

Janice Keil
Peterborough, Ontario
January 27, 2020