



**Written submission from
Robert Paehlke**

**Mémoire de
Robert Paehlke**

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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Comment to CNSC

I have taught and written about environmental policies including pollution and energy for nearly 50 years, but this comment is mostly a personal plea. I strongly oppose the possibility of siting additional operations, specifically the handling of uranium in pre-pellet form, at the former GE plant between Park and Monaghan near in downtown Peterborough.

I do not oppose nuclear electricity per se (though I do not believe new plants are, economically, the best low carbon option presently). What I object to is siting the facility in the middle of our city within a residential neighborhood in proximity to both elementary schools and our new hospital. The risks associated with this industrial operation would be far lower if it was sited where potential exposures of individuals, especially children, would be far lower. This could be accomplished relatively easily by locating the operation within an already a security zone where radiation measurement is already in place—for example in proximity to Darlington nuclear station or some other such facility.

Yes, putting this operation in such a location might well require erecting a new building, but such a building could be created to the highest possible safety standards in ways that a fifty plus year old industrial building could not. Nuclear electricity will likely be with us for decades more. Darlington is the most recently constructed plant and therefore the one that will be in place the longest.

Whatever that would cost I find it hard to believe that it would be more than would be lost through the depreciation of proximate residences were this operation located at the old GE plant. An even greater cost would be the foregone opportunity to redevelop a great deal of land to medium density residences and other uses. Land this close to the downtown core is valuable economically and in terms of creating a more compact city that would be significantly less carbon intensive.

The personal side of this is that one of my sons attended Prince of Wales, the most proximate elementary school and my other two sons attended another proximate school. All three children are older now and only one of the three lives in Peterborough. But I have two grandchildren here living not very far from the

site in question, one grandchild is two years old and the other is two weeks. They will potentially be exposed both at home and at school and perhaps all their in lives into the future. Children are at higher risk and duration of exposure increases risk. Thousands of other Peterborough children would face the same risks. Why should they?

The risks in this case, even if statistically small in comparison to some other risks they may face from auto accidents to climate change, is real. It is also *utterly unnecessary*. There are other options and they are not unaffordable for a society as large as ours. The cost per person of the nuclear electricity produced could not be more than a fraction of a cent more per month per Ontario household. Why put our children and grandchildren at *any* greater risk for that difference?

Peterborough's greatest appeal is that it is a city with natural and cultural amenities where living is safer than many others. Why would we put that appeal and that comfort at risk unnecessarily?

Robert Paehlke