



**Oral Presentation**

**Exposé oral**

**Written submission from  
Sarah Vandenberg, Sabrina Hale,  
Jennifer Ross and Jessica Arsenault**

**Mémoire de  
Sarah Vandenberg, Sabrina Hale,  
Jennifer Ross et Jessica Arsenault**

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**

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Application for the renewal of the licence for  
Toronto and Peterborough facilities

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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*

**To : CNSC**

**Re:** 10 year licence request by BWXT to process uranium into fuel pellets in the city of Peterborough.

**On behalf of:**

Sarah Vandenberg, mother of two children attending neighbouring schools, BFAH, BEd, OCT  
Sabrina Hale, mother of two children attending neighbouring schools, BFA, BEd, OCT  
and Jennifer Ross, mother of two children attending neighbouring schools, BSc, BEd

**As teachers and parents, we request the licence not be granted.**

We uphold nature connection as a high value and priority for our children, and we believe the people, air, soil and water need to be protected from the toxic substances used in uranium pellet production. In school, our children are taught to revere and respect nature, and themselves. We hope you will keep our neighbourhood safe enough so that the children can continue to play in Jackson Creek and eat the food we plant and grow in the soil at The Mount Community Centre, 1500m from the Peterborough location of BWXT. One of our children also goes to Prince of Wales School, only 170m from the BWXT location.

**Rationale:**

We urge you to **NOT** to grant a licence to BWXT to process uranium for pelleting, a toxic, radioactive element, in our city of Peterborough.

**Concerns about Health and Safety Risks and Risk Management**

- Accidents happen! There are absolutely *no* guarantees of accidents *not* happening. Do not risk the health of our children by processing of nuclear materials in a residential area so close to their schools. Any risk of this nature is comprehensively unacceptable.
- This "licence to process" cannot guarantee zero leakage. There is *always* a risk of radioactive leakage. There are no guarantees of totally eliminating all leakage during processing. Minimizing radio-active dust leakage is not possible within a city, especially with the particularly vulnerable children at Prince of Wales and Hardwood Nature Schools, located respectively 170m and 1500m away from BXWT.
- Please do not layer the toxicity that already exists in the soil at the former GE plant and area with new toxic materials. The city block location being considered, and partly occupied by BWXT, already has a historical problem of toxicity that has NOT been resolved. Decisions made in the past that have caused present problems should not be an excuse to abandon the hope of healthy soil in our neighbourhood!
- We are concerned about the inherent and unavoidable risk in transporting radioactive materials to and from the facility, down roads our children, aged 3-7, travel to their schools. Transporting toxic chemicals by rail, a much safer option, is also risky, as many operational and human error accidents still occur: take for example, the Lac Magentic catastrophe.
- There is an explosive risk associated with the quantity of hydrogen requiring storage in the industrial facility location. There is always risk associated with storing explosives, and no guarantee an explosion or mishap could be contained! After the accident, **due to**

human error, of the Toronto Sunrise propane filling station located in Downsview, it became immediately apparent that such a facility should no longer be allowed to exist in a densely populated city.

- How is the amount of insurance required by BWXT assessed? How can residents trust and be sure that BWXT insurance coverage is adequate for the array of accidents and transgressions that could potentially occur in dealing with toxic chemicals so close to children? How much insurance would actually cover the magnitude of the variety of disasters that could occur now and in the future? Is it even viable to run a business with the realistic and appropriate insurance in a residential neighbourhood? What if we, the people of Peterborough, neighbours and visitors of the land around BWXT, don't agree about the compensation levels or acceptable levels of insurable risk? We believe the risks are too great to be insured properly.

### **Concerns about Expansion Plans**

- There is mention of moving all operations of pelleting by BWXT from Toronto to Peterborough after the licence is granted. This is a future licence waiting to be granted, in connection with the present license, so expansion of pelleting can be realized. So, more toxicity is part of the foreseen plan. The business plan submitted by BWXT should be scrutinized thoroughly, and we think CNSC should carefully review, discuss and decide upon expansion goals at this stage of the planning process in light of the intention to expand. How much is too much processing in a residential neighbourhood? What precedents are set based on other uranium pellet processing plants, for protecting the health of BWXT's neighbours in a residential, densely populated neighbourhood. What amount of processing is the target and what is the acceptable threshold that can be supported in a neighbourhood so close to so many residences and schools? What if parents find the risk of having their children at the local school too great but can't afford to move, aren't allowed to enrol at a different public school, or can't drive their child to another school farther away? Allowing this permit could result in the closure of the local public school or force parents into making a gamble with their children's future health. By even considering this permit, CNSC is asking parents to consider the potential risks to their children's health, and it is inconsiderate and stressful to families. We believe it would be unconscionable for CNSC to provide the license renewal to BWXT.
- Property market values in our city are rising, perhaps due to GTA population spillover, highway 407 completion, the Lift Locks, our national heritage site, growth in municipal tax revenues, quality of life together and the beauty of our city. These tangible benefits of our vibrant city should not be undermined by allowing the proposed nuclear fuel processing plant licence. People of Peterborough are most concerned by the granting of this licence or any other related licences for toxic chemical processing in our city, beside our schools and children!
- We are already living with the effects of the nuclear accidents that have already occurred all around our precious planet! These accidents have caused much grieving and untold suffering for the many permanently affected families! Locally, nuclear processing has crippled the town of Port Hope for decades and the costly major cleanup will likely take another decade, maybe more. There are still issues involved regarding the safety of processing nuclear materials, making it a constant danger or threat to every living thing in its vicinity! Nuclear processing is just too dangerous for a city to consider permitting

within its boundaries. We have the second largest country, so why process a deadly chemical within any vibrant Canadian city?

## **Summary of Our Position:**

### **1. Nuclear Processing Will Have Unacceptable, Negative Health Consequences for BWXT Neighbours.**

The processing of radioactive materials within city limits is a totally unacceptable health risk, and should be disallowed due to the blatant immediate and long-term health risks. We are particularly concerned about uranium dust and other emissions in the air since the 2014 CNSC air sample taken at Prince of Wales School, was at least 13 times the background uranium concentration (BWXT Compliance Reports).

### **2. There is No Reasonable Risks for Children in Proximity to Explosive and Radioactive Substances.**

There are no acceptable safety measures and regulations that will eliminate dangers posed by other chemicals used in the process, such as hydrogen. Hydrogen used in processing uranium should *not* be stored in quantity in proximity to schools.

### **3. Mandatory Public Access to Information about Toxic Substances, Monitored by a Third-Party, Should Be Given to Neighbours BWXT.**

We believe that independent, unbiased, third-party monitoring must be done to record and maintain data about all emissions and substances, in any amount, that are brought in, used, modified and which exit the facility in any way. We need timely access to those results, any that may relate to health risks, whether levels meet CSNC standards, or not, so we can make educated decisions for our families.

## **Questions:**

1. How will the uranium pellet production be monitored to ensure maximum safety and accountability?
2. How much liability insurance will be considered adequate for BWXT to hold in case of an accident or transgression?
3. What independent, unbiased third parties will be monitoring and assessing the safety levels of chemicals used in the process? Will members of the public have access to this information? How?
4. What is the decommission plan for this work?
5. What factors would lead to a denial of this licence request?
6. What other uranium processing plants in the world are located within such proximity to schools? In our research, the only one we have found is recent, and in Toronto. Since the safety of the children in this school cannot be guaranteed, please reconsider granting a licence to BWXT to process uranium for pelleting.

## **Requests:**

We humbly request, through our Access to Information right, that all the pertinent and detailed safety-testing results of BWXT's operation be shared immediately, continually and in perpetuity with us so that we may share it with our neighbours so they can make educated decisions for the health of their families. We also request that BWXT's current, proposed and projected operations are properly monitored, addressed, and reviewed by third parties before granting any licence to process uranium for pelleting in our city.

We request denial of a ten year licence to BWXT to make fuel pellets of processed uranium 170m from the location Prince of Wales Public School, and 1500m from the location of Rowan Tree Preschool and Hardwood / Rowan Tree Nature Kindergarten, or at any public or private

gathering space or residence of any child. We do not feel that processing uranium, and the inevitable contamination and risk associated with this activity is acceptable in a residential area or in such immediate proximity to the vulnerable children in neighbouring schools and homes. Airborne uranium particles can cause lung cancer when inhaled. It is irresponsible to have a pelleting facility across the road from an elementary school.

We ask that you value the land, water, air, and all living beings under, near and around BWXT as a whole entity, not beyond help, worth protection and deserving of health.

We know that making a decision about the location of this plant may not be within the historical scope of your decision-making at CNSC. We respectfully suggest that the people at CNSC should include location and proximity to schools and vulnerable populations when issuing permits to businesses wanting to use radioactive and explosive materials.

We urge you to please take up the honour and responsibility of ensuring that our children will learn in a safe neighbourhood. Kids love to play in the dirt. Please don't let BWXT contaminate their sandboxes.

Thank you for requesting feedback from the people of the city of Peterborough.

We would appreciate knowing that you have received our Letter of Intervention.

Respectfully,

Sarah Vandenberg BFAH BEd. OCT  
High School Teacher at I.E. Weldon Secondary School  
Parent of one child currently attending 1500m away from BWXT site, Hardwood / Rowan Tree Nature Kindergarten, and of two children attending 1500m away from BWXT site, Hardwood / Rowan Tree Nature Kindergarten, as of September 2020.

Sabrina Hale BFA BEd. OCT  
Lead Kindergarten Teacher at Hardwood / Rowan Tree Nature Kindergarten  
Parent of one child attending 1500m away from BWXT site, Rowan Tree Preschool and Hardwood / Rowan Tree Nature Kindergarten and one child attending 170m away from BWXT site, Prince of Wales Public School

Jennifer Ross BSc. BEd.  
Assistant Kindergarten Teacher at Hardwood / Rowan Tree Nature Kindergarten  
Parent of two children attending 1500m away from BWXT site, Hardwood / Rowan Tree Nature Kindergarten

Jessica Arsenault BFA, M.A  
Parent of one child currently attending 1500m away from BWXT site, Hardwood Nature Kindergarten. Parent of one child attending 1500m away from BWXT site next September (2020) at Rowan Tree Preschool

Address of Rowan Tree Children's School and Hardwood / Rowan Tree Nature Kindergarten  
1545 Monaghan Road, Mount Community Centre,  
Peterborough ON K9J 5N3