



Oral Presentation

Exposé oral

**Written submission from
Lana Kouchnir**

**Mémoire de
Lana Kouchnir**

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 by Email on January 27, 2020

Below is my written intervention to BWXT Toronto's application for a 10-year licensing renewal.

Note that I would like to make an oral presentation at the March 2-3, 2020 hearing.

Dear Canadian Nuclear Safety Commission,

In over two years of living within 2km of the plant, I only learned of the plant one week ago via a community member. I'm extremely concerned for my health and the health of my community.

That a uranium processing plant does not belong in a densely-populated residential neighbourhood is an obvious truth.

As an accomplice to the billion-dollar nuclear industry, the CNSC is highly skilled at concealing obvious truths.

The CNSC claims that the BWXT Toronto uranium plant—a plant that processes 53% of all the uranium used in Canada's nuclear reactors—is not a danger to public health.

The CNSC's permitted emission levels are absurdly high. The CNSC permits 9 metric tonnes of uranium to be dumped into the sewer annually. A release of 760 grams of uranium into the air is permitted each year.

Dr. Gordon Edwards of the Canadian Coalition for Nuclear Responsibility has shared that: "Each gram of uranium that escapes BWXT's filters in Toronto is made up of approximately 7.8 trillion particles." It has been calculated by the Uranium Medical Research Centre that a single 2.5 micron dust grain releases a radiation dose 200 times the legal dose limit for a Canadian citizen. The inhalation of a single particle is hazardous and can cause cancer and other serious illness. In his intervention speech at the 2013 CNSC hearing regarding the Lansdowne uranium plant, Dr. James Deutsch (MD, PhD, FRHC.(C), Faculty of Medicine, University of Toronto) shared the following:

"The term 'normal background radiation' obscures the fact that the newly created man-made radiation and reactors is in the form of new elements, many of which exert their toxic effect once they are incorporated into the tissues organs and the organism.

The race to produce fuel has left immense piles of uranium tailings. We humans evolved with most of the uranium in the ground safely away from our DNA. Uranium emits alpha particles that are relatively harmless outside the body; The industry loves to tell this one-sided part of the story. There is another story: If inhaled or ingested, these alpha particles can do major damage to DNA molecules -- especially in children and fetuses. There is still much to learn about the medical aspects of exposure to external and internal radiation. It's clear that not only cancer can result from alpha radiation --often after years or decades-- but also birth defects, chromosome damage, inheritable diseases, and a general increase in disease susceptibility."

If transparency and safety is of concern to the CNSC, why hasn't the CNSC provided clear answers to the following questions:

- 1) What steps has the CNSC taken to ensure an adequate public information program? The existence of the BWXT nuclear plant is largely unknown to the surrounding community.
- 2) The uranium plant is within a 1.5 km distance of five public elementary schools. How have the schools been involved in the public information program?
- 3) What is the detailed emergency plan in the event of an accident?
- 4) What are the specific safety precautions and steps involved in the transport of raw uranium materials through dense city traffic?
- 5) What specific safety precautions are applied to the above-ground 9000 gallon tank of highly-flammable liquid hydrogen that the uranium facility houses next to an active rail line?

The CNSC's history is marked by a prioritization of the billion-dollar nuclear industry over public health and safety. As a Ukrainian immigrant, I have observed the striking parallels in the vacuous, obfuscated claims of safety by the nuclear industries in Canada and Ukraine. I am painfully familiar with the stories of Ukrainian elders who storytell the ongoing impacts of the Chernobyl nuclear explosion. This hearing represents a historical choice point that future generations will ask us to storytell. Future generations will ask: What did you do to end the radiation impacting the densely-populated surrounding neighbourhoods? This hearing is an opportunity to shape in the present-time a future answer that centers integrity.

Expect that there will be growing opposition from activists, community members, schools, scholars, researchers, and families in the rapidly-growing neighbourhoods surrounding the BWXT Toronto uranium plant.

Expect that the CNSC's efforts to conceal BWXT's dangerous operations will be further revealed.

Expect that the BWXT Toronto uranium plant will be shut down.

Sincerely,

Lana Kouchnir

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Toronto, Ontario