



**Written submission from
Drew Ginter**

**Mémoire de
Drew Ginter**

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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CARN (a group of citizens concerned about what is happening on the old GE site) is opposing the BWXT application for uranium pellet processing. Their opposition has been characterized by some as a NIMBI movement. It should in fact be looked at for what it is: a student and public safety issue.

The Canadian Nuclear Safety Commission's assertion that the *licensed* release of 760 kg/year water used in uranium production into Peterborough sewers is safe and acceptable (there is of course no history of any issues with water contamination from previous operations at the site), and the licenced release 550 g of uranium /year into the air- next to AN ELEMENTARY SCHOOL seems specious. These figures might be reasonable in a non-populated industrial area. However, the BWXT plant is right in the middle of dense urban housing, and less than 25m away from the playground of Prince of Wales Public School. Any reasonable person would turn down a request to open a nuclear processing facility next to a public school. BWXT is disingenuously using the industrial zoning, which is an archaic holdover from less enlightened times when public safety was not a pressing concern.

We must also consider the more IMMEDIATE dangers of transporting and using fluorine, hydrofluoric acid, and compressed, highly explosive hydrogen gas through, and in a residential neighbourhood and immediately adjacent to A SCHOOL. These are substances that should never be permitted to be used in a school zone.

All three of the aforementioned substances are dangerous and regulated materials. It is highly unlikely that any facility would be granted a NEW licence to work with these chemicals in a residential area. BWXT is benefiting from working in a legacy site that existed in, and contaminated, residential neighbourhoods before the public knew better and before stringent safety guidelines (written to balance industry needs with public safety) existed.

I would respectfully ask that BWXT license renewal be rejected. Barring this, I emphatically ask that you please reject their application to manufacture uranium pellets immediately adjacent to a public school.

Sincerely,

Drew Ginter