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Oral Presentation

Exposé oral

**Written submission from
Steve Daniels**

**Mémoire de
Steve Daniels**

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 on January 26, 2020 by Steve Daniels

I am opposed to pelleting at the BWXT Peterborough site. I ask the CNSC to deny BWXT's request to begin production of uranium dioxide pellets in Peterborough.

I attended the BWXT information session held at Peterborough's Evinrude Centre on October 8th, 2019. It was glossy. The conversations I had that day with BWXT employees were not.

The evening was structured around convincing residents that pelleting would be a risk-free industrial process that BWXT doesn't really want to bring to town. The justification for needing to include pelleting in the application, one repeated by several employees was that the licence period is 10-years long. Signage at the event (photo included) indicated the following:

"While there is currently no plan to change existing state of operations, including the flexibility to allow BWXT NEC's Peterborough facility to conduct pelting will help to ensure that BWXT NEC has the ability to adapt as needed to changing business needs over the decade-long licence period."

The implication in this statement is that licences last 10-years. And given this regulatory constrain imposed on the company, BWXT needs flexibility. As stated, this position was reinforced by employees.

At the same event, CNSC's Senior Project Officer Julian Amalraj informed members of the public that licence length is actually requested by the company. He stated the length of licence is not imposed by the CNSC, and that a company can ask for any licence length.

This conflating of legal requirements and corporate wants by BWXT is typical of their miscommunication.

These communication tactics when used by BWXT at their information session strive to remove my ability to protect my children. They strive to remove my agency and my ability to say no.

The truth is simple. BWXT wants to bring uranium pelleting processes to Peterborough.

As evidenced by their own compliance reports, pelleting is more harmful to workers, releases more emissions into the environment and is more likely to endanger the residential neighbourhood in which the Peterborough site is embedded. Uranium, liquid hydrogen and beryllium have no place beside homes.

BWXT compliance reports go on to suggest that one would have to be in constant contact with the site for it to be a health concern. Well, some of live such contact. The Peterborough BWXT site is bordered by homes on two sides and an elementary school on the third. Children at that school regularly play in a sandbox that is closer to BWXT than it is to the swing sets. Some of those kids walk home along the BWXT fence lines and go to sleep in BWXT's shadow.

BWXT's annual compliance reports also use data and language meant to placate. They offer charts designed to suggest no harm. Tables report numbers that appear well below thresholds. But IEMP numbers tell a different story. BWXT claims near zero emissions; yet beryllium accumulates. In our gardens, on our school grounds, playgrounds and in parks it accumulates. At every site measured in Peterborough, since BWXT's arrival, beryllium levels have moved closer to the legal threshold. In some sites — like at that school — more than doubling.

If pelleting comes to town there is no doubt this will be the case for Uranium as well.

BWXT you are not a good neighbour. You are being disingenuous when you claim you do not want to bring pelleting to Peterborough. You are seeking a loophole. You want a backdoor that allows you to damage this community without oversight or meaningful dialog.

By claiming no intention to pellet while asking for permission to do so, BWXT is using this application process and CNSC oversight to avoid talking about the risks and impacts of pelleting on our community.

BWXT if you don't want to pellet, why are you asking for permission?

Given that the "need for flexibility" over the lifetime of the licence was stated by BWXT as driving their request to bring pelleting to Peterborough,

And given that this "need" is a actually just a desired business solution to a problem they have artificially created through their own licence request,

And given that BWXT claims to not want to pellet in our community anyway;

I ask the Commission to deny BWXT's request to include pelleting in Peterborough as a part of their licence renewal.

BWXT
Nuclear Energy Canada Inc.

LICENCE RENEWAL

On Nov. 12, 2018, BWXT Nuclear Energy Canada (BWXT NEC) submitted an application to the Canadian Nuclear Safety Commission (CNSC) to renew its Class IB Nuclear Fuel Facility Operating Licence for a period of 10 years. The current licence, issued on January 1, 2011, is valid until December 31, 2020.

The current licence authorizes BWXT NEC to perform activities at two facilities: The Toronto facility located at 1025 Lansdowne Ave. and the Peterborough facility at 1160 Monaghan Rd. The Toronto facility is authorized to produce natural and depleted uranium dioxide pellets while the Peterborough facility is authorized to produce and test fuel bundles using natural and depleted uranium dioxide pellets. The Peterborough facility is additionally authorized to receive, repair, modify and return contaminated equipment from off-site nuclear facilities.

BWXT NEC is seeking one change to its licence with regard to pellet manufacturing operations. BWXT NEC is seeking the flexibility during the proposed next 10-year licence period to permit

While there is currently no plan to change the existing state of operations, including the flexibility to allow BWXT NEC's Peterborough facility to conduct pelleting will help to ensure that BWXT NEC has the ability to adapt as needed to changing business needs over the decade-long licence period.

Key Dates
January 27, 2020 Public Intervention Submission Deadline

March 3-5, 2020 BWXT NEC Public Hearing at York Halls, Holiday Inn Toronto Yorkdale Videoconferencing will be available in Peterborough, ON (location TBA)

Public Participation
Members of the public, Indigenous groups and stakeholders who have an interest, expertise or information that may be useful to the Commission in reaching its decision are invited to comment on BWXT NEC's application and can do so by following the CNSC's intervenor process. Interventions can be made either via a written submission or a written submission accompanied by an oral presentation at the hearing.

Requests to intervene must be filed with the Commission Secretariat by January 27, 2020, either online, by email, by fax or mail.