



**Written submission from  
Laurie Westaway**

**Mémoire de  
Laurie Westaway**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,  
Toronto and Peterborough Facilities**

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**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

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*

January 16, 2020

Senior Tribunal Officer, Secretariat  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

*Sent by email [cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)*

**RE:** Intervention by Laurie Westaway for the BWXT Licence Renewal (Hearing Ref. 2020 - H - 01)

Laurie Westaway requests to intervene in the hearing in the above-referenced matter at Peterborough.

To whom it may concern:

Currently, I have one daughter attending Prince of Wales public school (in grade 7) located within 20 metres of the BWXT nuclear processing facility and my family of four live within the 1.5-kilometre area of the BWXT property.

### **Communication**

In the transcripts of the January and September 2010 hearings, the following statements were made;

“Peter Mason “And I would also point out on the photograph, just to your left and bottom of the photograph, the Prince of Wales Elementary School which is just across the road from our facility and we have an excellent relationship with the Parent/Teachers Association there, keeping them regularly informed of what we’re doing and that type of thing.””

From 2015 until 2019, I was a regular participant and held formal positions on the Prince of Wales parent council (Coordinator of the Arts program and Treasurer). During that time, and based on the request of parent council, I recall that BWXT presented on two occasions. Due to time constraints, these presentations were limited to providing parent council members with a brief overview of the output of the activities at the facility and clear statements of its safety. No risks were ever identified or outlined. BWXT clearly stated that the facility was strictly controlled and met all health, safety, and environmental requirements.

Although BWXT has indicated that communications to the community have met the terms of the license, I fear that this has not been adequately demonstrated by BWXT. It is prudent for the corporation to show due diligence in this area. Distribution of newsletters, website presence, presentations to small gatherings, public hearings, and invitations to community barbecues (on rainy days on long weekends in the summer) does not adequately show that the public is aware of the activities of the facility nor the risks associated with ongoing and expansion of operations.

Gerald Crawford “Staff note that there is a low level of public interest in either facility. This has been the case during the current licensing period.”

Communications with the community (called the “Avenues”) the residential heritage area located within 1.5 kilometres of the facility has been limited. I have lived on Pearl Avenue for 10 years and have only received one newsletter from BWXT regarding the facility. Other information about the facility has come from community members and neighbourhood email distribution lists.

To this end, I would suggest that awareness of the facilities activities, and therefore the risks associated, is extremely limited. Therefore, I respectfully request that CNSC defer granting of this licence until such a time that BWXT can demonstrate (i.e. “proof” by, for example, survey results) an appropriate level of awareness within the community of its operations and the risks associated.

### **Beryllium (Be)**

Beryllium has been named by CERN as the “most dangerous of industrial chemicals”. Emission limits have been steadily progressing downwards. It has been suggested by some scientists (Beryllium exposure and chronic beryllium disease; Infante, Peter F; Newman, Lee S, The Lancet 02-07-2004) that even the current miniscule limit of .03µg/m<sup>3</sup> is too high.

As the transcripts of hearings suggest, the CNSC recognizes the significance of Beryllium and its potential dangers. However, I am very disappointed that I have never read any concerns on the part of CNSC that reflect the proximity of the beryllium point source to the most vulnerable children at Prince of Wales. The BWXT stack is within 30m of the kindergarten yard. This is a place where kids breathe and play/eat soil for hours of every weekday.

Also, my understanding is that testing for exposure is limited to questionable soil analysis in locations where the children do not play. But what about epidemiological studies of the children in attendance of Prince of Wales? The toxicity of Be is poorly understood for adults, with limits being estimated for humans based on effects on animals, but there are virtually no epidemiological studies that show the effects of Be on children.

In these circumstances, it is prudent of CNSC to follow the **precautionary principle** which states that if “...the potential harm of a new product or process whose ultimate effects are

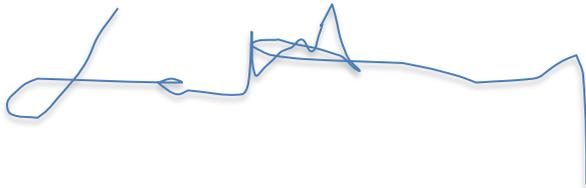
disputed or unknown...” that “pausing and reviewing” is the best strategy when “extensive scientific knowledge is lacking”.

## Summary

In summary, I highly recommend that CNSC:

1. Require BWXT to show due diligence with respect to communications within the community by clearly demonstrated results of “awareness” – not just attendance numbers and the number of flyers distributed.
2. In recognition of the dangers of Beryllium (Be) emissions, request BWXT’s licence be deferred or limited to 2 or 3 years, not 10. That the license requires the existing stack be relocated to a site on the property that is much further removed from our most vulnerable children. That the precautionary principle be utilized until such a time that scientific evidence on the matter of Be exposure can demonstrate the health and safety of children attending Prince of Wales public school.

Sincerely,



Laurie Westaway

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████████████████████, Peterborough, ON ██████████

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