



**Written submission from
Claire Symington**

**Mémoire de
Claire Symington**

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

*This page was intentionally
left blank*

*Cette page a été intentionnellement
laissée en blanc*

January 25, 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

Dear Sir or Madam:

RE: BWXT Nuclear Energy Canada's application to license FFOL-3620.1/2020

I am writing this intervention regarding the license application of BWXT in Peterborough seeking "the flexibility to conduct pellet production."

I am submitting my intervention as a concerned parent of a child who attends Prince of Wales Public School on Monaghan Road in Peterborough which is in close proximity to the BWXT facility.

It has come to my attention that BWXT is seeking an amendment in their license renewal that would allow them to process uranium pellets in addition to producing nuclear fuel bundles and repairing radioactive equipment which they currently do at the Peterborough site on Monaghan Road. I am strongly opposed to this amendment.

It is my understanding that this new pelleting process will involve the handling of large quantities of fine uranium powder thereby significantly increasing the emissions of uranium dioxide beyond what are currently released just from the fuel bundling. According to the BWXT website, in 2017 and 2018 the air emissions at the Toronto facility where the pelleting is currently done were 3000 times higher than they were in Peterborough. It is unconscionable that BWXT would allow this increase in toxic pollutants to be emitted from its smokestack directly across the street from a public school where children play outside only meters away! Uranium dust can be easily inhaled or ingested which is far more dangerous than other types of radiation such as x-rays and children are particularly vulnerable to the effects from this type of exposure.

I have learned that BWXT will have to monitor its emissions by taking soil samples from the school property and from the surrounding residential neighbourhood. In addition air samples from the boundary of the facility will be taken. I was informed that at the Toronto facility some of these samples were alarmingly higher than natural background levels. If levels such as these were to be discovered near or on the school property, I would like to know what the protocol will be for informing and protecting the school community. To date I feel that BWXT has a very poor

track record of being transparent about their activities and have not communicated openly about their intentions to pursue this amendment.

The prospect of accidents occurring so close to a school and residential neighbourhood also greatly concern me. The flammability of powdered uranium dioxide, an on site sintering furnace and the use of large quantities of explosive hydrogen add a much greater element of risk than what is required for the current operations at BWXT. There is also the very real possibility of flooding which could cause radioactive contamination to our local waterways.

It is important for me as a parent to stand up for the rights of my child and all other children to feel secure and protected in their school environment. To jeopardize the health and safety of these students as well as the community at large is an unacceptable risk. The consequences of being exposed to elevated levels of radiation and other toxic emissions from BWXT could be dire to people and the environment and would only add to the terrible legacy of contamination and illness created by GE operations on this site in the past.

BWXT's proposed amendment is a dangerous and irresponsible venture and shows careless disregard for the welfare of the students and staff at Prince of Wales and the residents of Peterborough as a whole. If BWXT were granted permission by the CNSC to conduct pelleting production I would no longer feel comfortable sending my child to school every day knowing that they are at an increased risk of being exposed to harmful emissions.

Sincerely,

Claire Symington