



**Written submission from the  
Power Workers' Union**

**Mémoire du  
Power Workers' Union**

In the Matter of the

À l'égard d'

**Ontario Power Generation Inc.**

---

**Ontario Power Generation Inc.**

---

Application for a licence to construct one  
BWRX-300 reactor at the Darlington New  
Nuclear Project Site (DNNP)

Demande visant à construire 1 réacteur  
BWRX-300 sur le site du projet de nouvelle  
centrale nucléaire de Darlington (PNCND)

**Commission Public Hearing  
Part-2**

**Audience publique de la Commission  
Partie-2**

**January 8, 2024**

**8 janvier 2024**



October 29, 2024

Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater St.  
PO Box 1046 Stn B  
Ottawa ON K1P 5S9

Re: CNSC Intervention - Darlington New Nuclear Project

The Power Workers' Union (PWU) supports the application from Ontario Power Generation Inc. (OPG) for a licence to construct a reactor facility for its Darlington New Nuclear Project (DNNP) on the site of the Darlington Nuclear Generating Station in Clarington, Ontario. Specifically, the PWU supports OPG's selection of the 300 megawatt General Electric Hitachi BWRX-300 reactor for deployment at the DNNP site.

Please find attached our written submission to the CNSC Intervention for the Darlington New Nuclear Project.

Sincerely,

Jeff Parnell  
President  
Power Workers' Union  
244 Eglinton Ave. E.  
Toronto, ON M4P 1K2

CANADIAN UNION  
OF PUBLIC EMPLOYEES,  
LOCAL 1000, C.I.C.

244 EGLINTON AVE. E.  
TORONTO, ONTARIO  
M4P 1K2

TEL.: (416) 481-4491  
FAX: (416) 481-7115

PRESIDENT  
Jeff Parnell

VICE PRESIDENTS  
Andrew Clunis  
Mike Hambly  
Tom Chessell  
James Middleton



## **PWU Submission to Canadian Nuclear Safety Commission Regarding the Ontario Power Generation Inc. Application to Construct one BWRX-300 Reactor at the Darlington New Nuclear Project Site**

The Power Workers' Union (PWU) supports the application from Ontario Power Generation Inc. (OPG) for a licence to construct a reactor facility for its Darlington New Nuclear Project (DNNP) on the site of the Darlington Nuclear Generating Station in Clarington, Ontario. Specifically, the PWU supports OPG's selection of the 300 megawatt General Electric Hitachi BWRX-300 reactor for deployment at the DNNP site.

### **The Power Workers' Union ("PWU")**

The PWU has been the bargaining agent for the majority of employees of OPG and its predecessor Ontario Hydro for almost 80 years. The workers at the new DNNP, like the approximately 1,300 workers already employed at the existing Darlington Nuclear Generating Station site will be represented by the PWU. The PWU also represents almost 5,000 additional nuclear workers at the Nuclear Generating Stations at Bruce Power and at the Pickering Nuclear Generating Station.

The employees represented by the PWU at the Darlington site work in all facets of the facility, including operations, administration, maintenance, security, projects and modifications, and first line supervisors. PWU members represent the "front line" of the day-to-day operations of the facility. The vast majority of PWU represented employees at the Darlington site live with their families in the immediate surrounding community.

### **Participation of the PWU in the Nuclear Regulatory Process**

The PWU appreciates the opportunity to address the CNSC in its important task of considering the application from OPG for a licence to construct a reactor facility for its DNNP on the site of the Darlington Nuclear Generating Station in Clarington, Ontario. The safety of the community and the workers it represents is the foremost concern of the PWU. The PWU welcomes the CNSC in its legislative mandate regarding these environmental issues. In the exercise of this mandate the CNSC provides an important level of oversight which is fundamental

to the maintenance of a safe and healthy workplace and community for our members.

### **Environmental Risks are Risks to Worker Safety and Health**

The PWU at Darlington have a longstanding culture of questioning attitude and conservative decision making. This culture is informed by lessons learned and operational experience from not only the nuclear industry, but others such as flight and rail, to name a few. The PWU will ensure that the same level of rigor is enjoyed by the DNNP.

Directly or indirectly, any issue in relation to potential adverse environmental impact from the facility will also cause a potential adverse impact on the safety and health of PWU represented workers at Darlington. Whether arising from the design, condition, or operation of equipment, or from work policies, processes or practices, any deficiency which creates the potential of a significant adverse environmental impact will be felt first by PWU members.

It is because of this convergence of safety interests between the industry's employees and the general public that the PWU believes that whatever it can do to improve worker safety and health will almost certainly improve public safety, health, and the environment generally. This is why we feel it is appropriate in this presentation to approach safety from the workers' perspective. It is what the PWU knows best, and where it can add the most value to the CNSC's deliberations. The health and safety of our members on the job has been the one issue above all others that has dominated the PWU's consciousness throughout our almost 60 years of nuclear history. By the time nuclear generation began in the mid-1960s, the union already had a deeply embedded health and safety culture that was able to guide it through the forest of new and unfamiliar occupational health hazards. One of the union's beacons is the principle that workplaces must be made as healthy and safe as possible.

We have been very aggressive on safety issues from the very beginning of Ontario's nuclear program because of the direct impact on our members. It continues to be part of the PWU's culture as a union and it has not diminished over time.

Consistent with this approach is the PWU's involvement in various regulatory oversight activities. We have always taken the position that safety and health issues must be satisfied first. Only then can any examination of the merits of potential alternatives be undertaken.

## **Nuclear Safety Today**

The PWU is very familiar with the design and operation of the existing Darlington and Pickering Generating Stations. The facilities we work in are technologically very sophisticated and the existing workforce are very capable, committed and extremely well trained. CNSC staff see on a regular basis how open, self-critical and exacting the nuclear operating culture is at Darlington. They deal regularly with senior workers who are among the most knowledgeable in their disciplines in the world.

Through our research, education, collective bargaining and activism in this area, the PWU has contributed very significantly to those measurable improvements made in nuclear safety over the past decades. In conjunction with OPG, the PWU has in place a comprehensive scheme whereby safety and health issues are monitored, evaluated and managed. These provisions are enforced through workplace policies, collective agreement provisions, license requirements, and legislative and regulatory requirements.

Training is the starting point of nuclear safety. Nuclear station workers use their training and experience to identify and deal with operational safety concerns. From the PWU's perspective, there are a number of key elements to the establishment and maintenance of a safe and healthy workplace.

### **a. Training:**

It is the PWU's view that the present nuclear operations and maintenance training regimes are coherent, comprehensive and effective. The key points include:

- i. The training required to work at a nuclear facility is very extensive and the programs are very systematic. All procedures are prepared and independently reviewed before they are put into operation. All the work processes are controlled. Re-qualification programs ensure skills maintenance and upgrading to meet changing conditions;
- ii. All workers are required to learn and demonstrate knowledge of the hazards of radiation exposure as an integral part of employment initiation and subsequent training. They are taught to monitor and minimize their own exposure and that of their fellow workers before being allowed on the job or to supervise others;

- iii. It takes at least seven years of training and experience to become an Authorized Nuclear Operator in charge of running a reactor;
- iv. There are typically several reviews underway concurrently that measure performance, procedures and personnel;
- v. The CNSC carries out audits of training programs and sets written and simulator based examinations of key operating staff.
- vi. Training is conducted and evaluated by those who know best - former plant operation and maintenance personnel.

Nuclear worker training programs at OPG are extensive and systematic. Worker performance is continuously monitored and frequently tested not only by Darlington management but also by the CNSC itself. Nevertheless, the PWU is always searching, in conjunction with the employer, for ways to improve employee training.

#### **b. Safety on the Job**

The role and makeup of the various Joint Health and Safety Committees (JHSCs) operating at Darlington evolves accordingly as projects reach stages or milestones of construction, refurbishment and turnover. Under the Occupational Health and Safety Act (*The Act*), the DNNP will be designated as a construction project and not industrial maintenance with OPG maintaining the role of Constructor as defined in The Act. After its completion the DNNP will be designated as an industrial site.

##### **i. Health & Safety Committee Structure at Darlington**

Currently, PWU members are provided the opportunity for meaningful input into the OPG Health and Safety Managed System daily through the Safe Work Planning processes established and maintained at OPG. Trained supervisors alongside trained workers review job plans before work commences. Together, the workgroup discusses the plan and ensures effective control measures that will prevent harm from all workplace hazards are in place before beginning all assigned work tasks. Furthermore, the plan is reviewed, and adjustments are made throughout the completion of these tasks.

Monthly workplace inspections are performed by worker members of the JHSCs. These worker members are certified by the Ontario Ministry of Labour, Immigration, Training and Skills Development (*MLITSD*). The

JHSC acts as an independent entity to objectively inspect and identify hazards in the workplace. They serve as a vital set of objective, “eyes and ears” in the field, striving to make Darlington a safer place to work. Workplace hazards that are discovered via these inspections are documented in the Station Condition Records (SCR) database. JHSC members also recommend corrective actions that would eliminate or severely mitigate these identified hazards. Once the hazard and their recommended controls are documented, it is the accountability of the management/supervisor responsible for the area inspected to systematically remove and/or otherwise control the identified hazards.

The PWU has 6 certified Joint Health and Safety Committee members and 1 certified JHSC Co-Chair on the existing Darlington Operations Joint Health and Safety Committee. Each certified member represents their designated workgroup members. The PWU represented positions at the Darlington GS JHSC are Operators, Training Specialists, Mechanical Maintainers, Civil Maintainers, Emergency Response Team, Control Maintenance, Chemical Technicians, Security, Radiation Technicians, Field Engineering and Clerical. This ensures the expertise from the different skills are readily available on the Committees.

Recently, the PWU agreed with OPG to move to a new classification and learning model for workplace events that occur. Currently, while we transition and to ensure meaningful worker involvement is maintained until everyone is trained appropriately, events are evaluated through both the previous Maximum Reasonable Potential for Harm (*MRPH*) model and the new Edison Electric Institutes’ (*EI*) Safety, Classification and Learning model. Regardless of classification models, we continue to have trained worker investigators from PWU, Society of United Professionals (*SUP*) and OPG Management form an investigation team to establish the root cause(s) and make recommendations, ensuring we learn from each occurrence. We make systemic changes to processes and build capacity to succeed because if we fail, we fail safely.

Beyond the required H&S committees legislated by The Act, the PWU has additional worker represented oversight committees within our PWU-OPG Collective Agreement.

This structure, combined with the empowerment of workers through the SCR mechanism and the right to refuse and stop unsafe work results in a net that captures all safety issues.

The PWU and OPG have agreed that a JHSC will be established for Small Modular Reactors (SMR) at the Darlington site and that the existing Corporate Work Protection Code will be used. This ensures that the existing and successful model of worker involvement and safety will continue at the new DNNP.

**ii. Station Condition Report (SCR)**

Any worker can call up an SCR form at a station computer terminal and submit a report of his or her concern. SCRs are typically submitted if a concern has not been satisfactorily resolved in a worker's discussion with supervision, but could be submitted even before such discussion. SCRs that are not resolved to the worker's satisfaction ultimately end up on the agenda of the Joint Health and Safety Committee.

**iii. The Right to Refuse**

Employees can refuse to do work they feel is unsafe and have done so. Most such refusals are resolved at the first stage. Failure to resolve the worker's concern at the first stage triggers a formal inspection and complete documentation.

**iv. The Right to Stop Unsafe Work**

In 1991, the PWU negotiated an authority to stop work policy with Ontario Hydro giving JHSC members the right to stop work if there is reason to believe that the work is unsafe. These rights have been continued in the PWU's agreements with OPG.

**c. Ongoing Improvements in Safety**

The PWU believes the essential safety infrastructure is in place and works well. Employee training is good and the tools workers have to deal with concerns are there. However, this is not a process with a beginning, middle and end. It is an ongoing and ever-present process. Some recent initiatives highlight this commitment to continuous improvement in the management of safety and health issues in the workplace.



**i. Structure and Location of OPG Senior Management**

One very important feature is the simple fact that the Senior Management at Darlington live and work locally. The proximity and accessibility of senior management personnel to the site has resulted in speedier resolution of issues, including safety issues, which arise between the union and management. This rapid resolution has permitted issues to be resolved more informally and before the escalation of the problem. It has resulted in a significant improvement in the overall relationship between the union and local management that existed under the previous management.

**ii. PWU Training**

The PWU is directly involved in many different aspects of health and safety training at and for the Darlington facility. Joint Health and Safety Committee member training is provided by PWU appointed instructors, paid for by OPG. Some of the training modules are provided by the PWU. In addition, the PWU provides health and safety training to its stewards and chief stewards at the Darlington facility. Finally, the PWU provides PWU staff support to the PWU JHSC Committee representatives and to Chief Stewards.

**d. Summary**

The same mechanisms and commitments in place at the existing OPG operated nuclear stations will remain and be duplicated in the DNNP. The PWU is confident that these mechanisms will ensure that DNNP is maintained and operated in a manner that protects the safety and health of the people who work there and the community. Moreover, these mechanisms permit the workers and their representatives to be proactive in ensuring that safety and health issues are addressed in a timely and appropriate manner. Most importantly, from the perspective of this proceeding, the same mechanisms that provide for the safety and health of employees on a day-to-day basis will ensure that the DNNP will not cause significant adverse effects on the local and broader environment.

**PWU Labour Relations**

The PWU and OPG have developed a mature and effective working relationship of almost eighty years.

PWU Representatives at all levels have ongoing meetings with OPG on a variety of topics and are engaged in the decision-making process at their workplaces to positively impact the working lives of their members. The PWU Chief Stewards are involved in Senior Level Joint Union Management Meetings (JUMMs) and Chief Stewards and Stewards are involved in a number of Department Level JUMMs. PWU members can, and do, comment on any business related activity via the Station Condition Report (SCR) process, at regular Safety Meetings and in a number of face to face forums. PWU Members are well trained and feel very comfortable asking question and raising concerns.

The PWU Executive Board Member representing Darlington and the Darlington Chief Stewards meet with OPG's senior leadership for Darlington and Darlington Refurbishment. As the new nuclear project progresses it will also be covered in these meetings.

The PWU Sector Vice President – Nuclear and the PWU Executive Board Members representing Darlington and Pickering meet with the OPG Chief Nuclear Officer and OPG-N's senior leadership.

The PWU President and Sector Vice Presidents meet with the OPG President and OPG's senior leadership regularly.

### **PWU Supports the OPG Application**

The PWU supports the Application, both in terms of the process by which it was prepared, and the substance of its analysis and conclusions.

In summary, the PWU agree with the CNSC Staff recommendations and findings. OPG's licence application contains sufficient information to demonstrate that OPG meets all the requirements of the Nuclear Safety and Control Act and the associated Regulations and demonstrates that OPG is qualified to carry on the activities to be licensed; and will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.

Specifically, as evidenced throughout OPG's application and supporting documents, the PWU supports the OPG assertion and the CNSC Staff Conclusion that consistent with the scope of the application:

- Nuclear safety will be assured such that the public, personnel and the environment are protected
- The DNNP site is suitable for the construction of a new BWRX-300 nuclear reactor;
- A management system is in place to effectively conduct the proposed licensed activities through the licence period; and
- Staff are qualified and competent to carry on the proposed licensed activities.

## **Conclusion**

It is natural that people have concerns about the safety of nuclear operations in Ontario, particularly those who live near nuclear sites. The importance of nuclear safety and its impact on the environment transcends all other considerations.

It is a fact that Ontario's nuclear safety record is outstanding. No member of the public has ever been harmed during the entire history of Ontario's nuclear operations. PWU members' training, commitment to safety and the PWU's culture helps ensure that the safety of workers and the community is now and always will be our paramount concern.

For the reasons expressed above, that the PWU submits that the CNSC should accept OPG's application and grant the licence to construct the new BWRX-300 at the DNNP under the *Nuclear Safety and Control Act*.