



Oral Presentation

Exposé oral

**Submission from the
Canadian Nuclear Workers Council**

**Mémoire du Conseil Canadien des
Travailleurs du Nucléaire**

In the Matter of

À l'égard de

**Ontario Power Generation Inc.,
Pickering Nuclear Generating Station**

**Ontario Power Generation Inc.,
centrale nucléaire de Pickering**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Pickering Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Pickering

Commission Public Hearing – Part 2

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

June 2018

Juin 2018



CANADIAN
NUCLEAR
WORKERS' COUNCIL

SUBMISSION TO THE

CANADIAN NUCLEAR SAFETY COMMISSION

FOR

**OPG PICKERING, OPERATING LICENSE RENEWAL FOR
PICKERING A & B NUCLEAR POWER STATIONS**

MAY 7, 2018

Members of the Commission:

The Canadian Nuclear Workers Council (CNWC) is an organization that is comprised of Unions that represent workers in Canada's Nuclear Industry. **The CNWC is the collective voice of the Unions in Canada's Nuclear Industries.**

The CNWC member Unions at the Pickering NPP site are:

- Power Workers Union (PWU)
- Society of United Professionals (SUP)
- Ontario Building and Construction Trades Council of Ontario (OBCTCO)

The local labour council, the Durham Region Labour Council (DRLC) is also a member of the CNWC.

The PWU & SUP represent the operational day to day regular staff at Pickering NPP. These two unions represent approximately 3500 workers at the site which is over 90% of the regular workforce.

The OBCTCO is a council of unions of the Construction and Building Trades Unions. These unions are on site for projects and outages. The number of workers will vary on a day to day basis. At the time of writing there were approximately 127 workers on site from the OBCTCO. This number will rise to several thousand during outages.

Our member Unions have also provided submissions in support of the relicense of the facility. The CNWC will attempt to not duplicate these submissions.

The CNWC has in consultation with our member Unions reviewed the Submissions from OPG and the CNSC Staff related to the request for the license renewal of the facility for a 10 year period.

The CNWC will comment on the following areas of the reports.

- Worker Conventional Safety
- Radiation safety
- Environment
- Public Perceptions
- Ageing Plant
- Term of License
- Conclusions

WORKER SAFETY - Conventional

The Nuclear Industry in Canada is a highly unionized sector. Unions place the health and safety of their members at the top of their agenda. As the CNWC has stated in many previous submissions to the CNSC a unionized worksite is much safer than a non-unionized workplace.

Workplace Health & Safety is legislated by provincial and federal statutes. It is very common in nuclear facilities' that the unions negotiate many provisions for health & safety which well exceed the minimum stated in legislation. This is the case at OPG Pickering A&B.

There is a very extensive worker health & safety program at the OPG Pickering Site which involves the onsite unions. These provisions are covered extensively in the submission from the Power Workers Union & the Society of United Professionals so we will not repeat them here.

The OBCTCO has a Health & Safety Trades Committee which is separate from the operations Joint Health and Safety Committees (JHSC). The OBCTO Union workers as indicated above come and go so they do work at other job sites. These workers will indicate that worker safety is a very high priority at OPG Nuclear Facilities and it is one of the safest worksites that they work at.

RADIATION SAFETY

The Unions on site have input into Radiation Safety concerns via the local JHSC or through the Joint Committee on Radiation Protection (JCRP). Over the years the workplace unions have worked with OPG to improve and reduce worker radiation exposures. This, plus improvements in technology have resulted in much improved exposures to workers.

The CNWC supports the CNSC Staff's conclusion, "CNSC staff are also satisfied with OPG's efforts in applying the ALARA principle and conclude that OPG's overall performance for this SCA is satisfactory".

ENVIRONMENT

Workers and their Unions are naturally concerned about the environment. Many of the station staff live nearby with their families; this demonstrates their confidence in the environmental & safety of the facility.

The Station continues to produce clean environmentally friendly power to the Ontario Electricity Grid.

Workers can raise any environmental concerns they may have with the employer and/or their unions.

PUBLIC PERCEPTION

OPG has and is doing a good job on public outreach.

The Pickering facility has been in existence for over 45+ years. A large community has developed in the vicinity of this site. This fact in itself confirms that the public is satisfied with the safety of the NPP.

During 2017 the CNWC took the lead on an on-line petition in support of the life extension of Pickering NPP. This exercise was to show support for the facility to the Ontario Ministry of Energy's (MOE) Long Term Energy Plan (LTEP). This petition contained over 10,000 signatures in support and was presented to the MOE.

The CNWC has coordinated several tours of the Pickering Station over the years for Union leader groups, politicians, etc. Some of these people had some skepticism about the facility prior to their visit but left with a sense of satisfaction that the plant was very clean and safety was a high priority.

The CNWC is provided with a good cross section of the public views in regard to the Pickering facility by our member unions and specifically by our member organization – Durham and District Labour Council and other nearby Labour Councils. At the day 2 hearing the Commission will hear the views of two members from these organizations.

There will always be a minority of people that are opposed to nuclear facilities. The CNWC as a Labour group recognizes the right to dissent. It is our opinion that the opposing groups in the vicinity of the Pickering site are only a small minority and most of the opposition comes from groups external to the area.

AGEING PLANT

Some concerns in regard to Pickering NPP being an ageing plant have been raised by, what we suggest are organizations external to the local community. The main concern being the fear that an older plant facing end of life will not be maintained to a high degree, that the risk of equipment failures will increase, and that safety may be compromised.

The CNWC does not have this concern. Power Plants are designed for a number of years of operation. There are many factors which contribute to the number of years a plant can be safely operated. With good maintenance, good operating practices, and other factors these facilities can be operated safely for more years than their theoretical design life. New technologies also contribute to identifying issues that require attention. This coupled with the fact that the Pickering facility is maintained and operated by very highly trained,

experienced, and dedicated workers. If there were any threats to the safe operation of these units immediate action would be taken by these workers

Further, the presence of CNSC Staff on site who monitor the operation of the facility assures the public that the facility will be operated safely.

The CNWC is in full support of the CNSC's Staff recommendation to "Authorize OPG to operate the Pickering NGS Units 5-8 fuel channels up to a maximum of 295,000 EFPH for the lead unit.

TERM OF LICENSE

There have been some concerns raised in regards of the Operating License being for a 10 year period. In the past the CNWC had concerns with the license periods being continually increased.

The CNWC is now supportive of the 10-year license due to the fact that the CNWC's annual Staff report on the NPP provides an opportunity for the public to raise any concerns that they may have with the operating of these facilities.

Conclusions

The CNWC is in full support of the renewal of the Operating License for Pickering A & B being renewed until 2028.

Respectfully submitted

**David Shier
National Director**