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**Written submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du
Conseil canadien des
travailleurs du nucléaire**

**Regulatory Oversight Report for
Canadian Nuclear Power Generating
Sites in Canada: 2019 and Update on
OPG's Refurbishment Project at the
Darlington Nuclear Generating
Station**

**Rapport de surveillance
réglementaire des sites de centrales
nucléaires au Canada : 2019 et mise
à jour du projet de réfection d'OPG
pour la centrale nucléaire de
Darlington**

Commission Meeting

Réunion de la Commission

December 9, 2020

Le 9 décembre 2020

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Canadian Nuclear Workers' Council

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November 16, 2020

Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
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Members of the Canadian Nuclear Safety Commission

RE: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2019 and Darlington Refurbishment Update

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's annual Regulatory Oversight Report for Nuclear Power Generating Sites in Canada for 2019, Reference CMD 20-M24. Please include this letter for the December 8-10, 2020 meeting of the Commission.

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry for more than 27 years. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

A number of CNWC Member Unions represent Workers at the Nuclear Power Generating Sites covered by this report, including; the Society of United Professionals (SUP), the International Brotherhood of Electrical Workers (IBEW), the Power Workers' Union (PWU), and the Provincial Building & Construction Trades Council of Ontario.

The District Labour Councils around all of Canada's Nuclear Generating Sites are also Members of the CNWC.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard by decision makers,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's Nuclear Industries, and
- enhance public knowledge about the many benefits of Canada's Nuclear Industry.

The Canadian Nuclear Workers' Council is comprised of Locals of the following organizations: District Labour Councils (Grey/Bruce, Durham, Northumberland, Lindsay and Saint John) * International Association of Firefighters * International Association of Machinists & Aerospace Workers * International Brotherhood of Electrical Workers * United Steel Workers * Power Workers' Union * Professional Institute of the Public Service of Canada * Public Service Alliance of Canada * Provincial Building and Construction Trades Council of Ontario (Ont. Building Trades) * Society of United Professionals * Society of Professional Engineers and Associates * UNIFOR * International Federation of Professional & Technical Engineers

For all CNWC Member Unions the Health and Safety of our Members is paramount. We work collaboratively with our employers to ensure this is always in mind. We believe that workplace health and safety, public safety and the protection of our environment are intricately linked. When our workplaces are safe it's better for the environment and safe workplaces result in safer communities. Nuclear Workers live, work and play in our nuclear host communities along with our friends and families. We take our responsibilities seriously. Nothing is more important.

The CNWC Board of Directors talk regularly and representatives from our Member Unions get together annually for conferences at different locations across our industry. We use our conferences as an opportunity learn more about Canada's Nuclear Industry, discuss current issues and learn from one another about our experiences. This has allowed us to tour all of Canada's Nuclear Generating Sites.

The CNWC is a regular intervenor at CNSC public hearings and meetings. We comment on CNSC Regulatory Oversight Reports and comment on the evolution of CNSC Regulatory Documents.

The CNWC has reviewed the 2019 Regulatory Oversight Report for Canadian Nuclear Generating Sites. We fully support the findings of CNSC Staff and their conclusion that all of Canada's NPPs and the Waste Management Facilities (WMFs) on their sites were operated safely in 2019.

Ontario Power Generation (OPG) – Darlington, OPG – Pickering, Bruce Power and New Brunswick Power – Point Lepreau all made adequate provisions for the health, safety and security of workers, the public and the environment.

CNSC Staff concluded that licensees complied with all applicable requirements and met expectations for all safety and control areas (SCAs). Their conclusions were based on compliance verification activities at each facility. These conclusions were further supported by safety performance measures. Radiation doses were below the regulatory limits, no radiological releases to the environment exceeded regulatory limits and the frequency and severity of conventional safety incidents were low. We also note that OPG successfully returned Darlington Unit 2 to service after completing refurbishment. This was done with the utmost attention to the safety of workers, the public and the environment.

The workplace health and safety standards at Canada's Nuclear Generating Sites are second to none. Employers and Unions at the NPPs and WMFs work together to ensure this. Studies have shown that unionized workplaces have higher standards of health and safety than non-unionized workplaces. Unions ensure their Members are comfortable raising concerns, they have internal health and safety expertise, they have well trained Representatives and well trained Members. There are many examples of Unions negotiating provisions that enhance health and safety. This all serves to help provide an additional level of oversight for the safe operation of these facilities.

An additional strength of the industry is all Licensees share their operating experience to ensure continuous improvement.

We would like to take this opportunity to thank the Commission, CNSC Staff and all Intervenors in this public meeting. The public hearings, public meetings and the continuous oversight of the CNSC and CNSC Staff all serve to make our workplaces and communities safer. Thank-you.

The CNWC is very supportive of the annual regulatory oversight reports. We would be pleased to participate in any future discussion on improving this process. If you have any questions for the CNWC please let us know.

Respectfully submitted,

Bob Walker
National Director
Canadian Nuclear Workers' Council