



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

**Mémoire du Syndicat des travailleurs et
travailleuses du secteur énergétique**

In the Matter of

À l'égard de

**Application for a temporary exemption
from sections 23.1.2(2) and 23.2.1 of
REGDOC-2.2.3, Personnel Certification,
Volume III: Certification of Persons
Working at Nuclear Power Plants**

**Demande visant l'exemption temporaire de
l'application des sections 23.1.2(2) et 23.2.1 du
document REGDOC-2.2.3, Accréditation du
personnel, tome III : Accréditation des
personnes qui travaillent dans des centrales
nucléaires**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

July 2021

Juillet 2021

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File 22639

April 27, 2021

VIA EMAIL: cnsccinfo.ccsn@canada.ca

Canadian Nuclear Safety Commission
280 Slater Street
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Ottawa, ON K1P 5S9

Dear Sir/Madam:

Re: CNSC Hearing Ref 2021-H-103

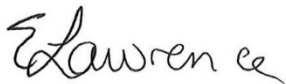
I am external counsel to the Power Workers' Union ("PWU"). The PWU has reviewed the materials filed in respect of the hearing to consider an application from Bruce Power for a temporary exemption from sections 23.1.2(2) and 23.2.1 of REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants (Ref 2021-H-103).

The temporary exemptions seek to address the situation of certifications of reactor operators previously certified at OPG and hired into the initial training program at Bruce Power, by providing an alternative approach to the certification of these operators. These operators include PWU members.

The PWU supports the recommendation of CNSC staff that Bruce Power's application for the temporary exemptions is reasonable and will have a neutral impact on the safe operation of Bruce Power.

The PWU may make additional submissions if the CNSC holds a public consultation process to amend REGDOC-2.2.3 Volume III.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



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c. Chris Dassios, PWU General Counsel