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

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

**Regulatory Oversight Report for
Uranium Mines, Mills, Historic,
and Decommissioned Sites in
Canada: 2020**

**Rapport de surveillance
réglementaire des mines et usines
de concentration d'uranium et des
sites historiques et déclassés au
Canada : 2020**

Commission Meeting

Réunion de la Commission

December 15, 2021

Le 15 décembre 2021



Canadian Nuclear Workers' Council

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November 15, 2021

Canadian Nuclear Safety Commission
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Members of the Canadian Nuclear Safety Commission (CNSC)

Regulatory Oversight Report for Uranium Mines, Mills, Historic, and Decommissioned Sites in Canada: 2020

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's Regulatory Oversight Report for Uranium Mines, Mills, Historic, and Decommissioned Sites in Canada for 2020, reference CMD 21-M34. Please include this letter for the Commission's public meeting scheduled for December 15-16, 2021.

The CNWC is a regular participant in CNSC proceedings.

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry since 1993. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication facilities, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

Specific to this submission, two CNWC Member Unions represent Workers at Uranium Mines and Mills covered by this report. Members of the United Steel Workers (USW) are employed by Cameco and Members of UNIFOR are employed by Orano.

The published 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

We strive to go beyond those goals and help our Member Unions and their employers keep ahead of evolving standards and share experiences. The continued health and safety of our Members is paramount. When our workplaces are safe it's better for the environment and safe workplaces result in safer communities. Nuclear Workers take their responsibility to protect the health and safety of people and the environment seriously. Nothing is more important.

Through the pandemic the CNWC Board of Directors maintained regular communications. Our conference was cancelled for 2020 and 2021 but CNWC Members have stayed connected. We plan to resume our in-person conferences in 2022. The conferences have proven to be an effective means of learning more about Canada's nuclear industry and provided opportunities to tour Canada's nuclear facilities including a couple tours of operating uranium mines and mills (UMM) in Northern Saskatchewan. The CNWC also intervened in the recent CNSC hearing on Cameco's application to renew the licence for their Cigar Lake Operation.

The CNWC reviewed CNSC Staff's Regulatory Oversight Report for Uranium Mines, Mills, Historic, and Decommissioned Sites in Canada for 2020, reference CMD 21-M34. We fully support the assessment and findings of CNSC Staff and their conclusions that all of Canada's Operating UMMs continued to operate safely in 2020. We note that for 2020 all Operating UMMs once again received a rating of "Satisfactory" in all 14 Safety and Control Areas (SCA).

Cameco and Orano have both made adequate provisions for the health, safety and security of workers, the public and the environment. CNSC Staff confirmed that radiation protection measures were effective and radiation doses were kept as low as reasonably achievable (ALARA), environmental protection programs were effective, and conventional health and safety programs continued to protect workers.

We would like to take this opportunity to thank the Commission, CNSC Staff and all Intervenors in this public meeting. This public process helps keep our workplaces and communities safe. Thank-you.

If you have any questions for the CNWC please let me know.

Respectfully submitted,

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