



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

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

In the Matter of

À l'égard de

**Bruce Power Inc.  
Bruce Nuclear Generating Stations A and B**

**Bruce Power Inc.  
Centrales nucléaires de Bruce-A et B**

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**Application to amend the power reactor  
operating licence for the Bruce Nuclear  
Generating Stations (NGS) A and B**

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**Demande visant à modifier son permis  
d'exploitation d'un réacteur de puissance pour  
les centrales nucléaires de Bruce-A et B**

Hearing in writing based on written  
submissions

Audience par écrit fondée sur des mémoires

**April 2023**

**Avril 2023**



## Canadian Nuclear Workers' Council

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April 17, 2023

Members of the Commission

c/o Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater St PO Box 1046 Stn B  
Ottawa, Ontario  
K1P 5S9  
[Interventions@cnsccsn.gc.ca](mailto:Interventions@cnsccsn.gc.ca)

**Reference 2023-H103**

**Bruce Power's Application to amend Power Reactor Operating Licence PROL 18.02/2028.**

Dear President Velshi and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the April 2023 hearing in writing regarding Bruce Power's Application to amend the PROL for Bruce Nuclear Generating Stations (NGS) A and B, PROL 18.02/2028, to remove Licence Condition (LC) 15.3 and consolidate all requirements for fitness for service applicable to pressure tubes under LC 6.1.

### **The Canadian Nuclear Workers' Council**

The CNWC was formed in 1993 as an association of Unions representing Workers across Canada's nuclear industry. CNWC Affiliates encompass uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, engineering, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning. This includes the Unions with Members employed at Bruce Power.

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 industry,
- enhance public knowledge about the benefits of Canada's nuclear industry, and
- share and learn from our experiences.

The CNWC is a regular participant in the regulatory process for Canada's nuclear industry.

#### Specific to this submission.

The CNWC monitored the matter very closely following the discovery of elevated Heq in some pressure tubes at Bruce A Unit 3 and Bruce B Unit 6. In our opinion the CNSC took the appropriate regulatory actions and has ensured the issue was thoroughly monitored and analysed.

In preparation for this submission we reviewed the relevant information found on the CNSC website and reviewed the Commission Member Documents (CMD) for this hearing, CMD 23-H103 submitted by CNSC Staff and CMD 23-H103.1 submitted by Bruce Power.

#### **Bruce Power's Application**

We support Bruce Power's application to amend PROL 18.02/2028 to remove LC 15.3 and consolidate fitness for service requirements applicable to pressure tubes under LC 6.1 Fitness for Service. This request reflects improved understanding of pressure tube behaviour. Note: In addition, we support of CNSC Staff's recommendation to add a new licence condition, LC 6.2.

Bruce Power has continuously demonstrated their commitment to the safe operation of Bruce A and Bruce B and the fitness for service of plant components. We are confident that will continue.

#### **CNSC Staff's Assessment on Bruce Power's application**

The CNWC is in full support of CNSC Staff's assessment of the application. We believe they reached the appropriate findings, conclusions and recommendations as set out in CMD: 23-H103, specifically:

- Remove LC 15.3. This updates the PROL to reflect recent Commission decisions and advancements in understanding related to pressure tube behaviour.
- Include a new LC 6.2, under the Fitness for Service SCA, which requires Bruce Power to implement and maintain an enhanced fitness for service program for fuel channels in extended operation.
- CNSC staff will continue to monitor Bruce Power's performance in respect of pressure tube fitness for service, through compliance verification activities.
- CNSC staff will continue to update the Commission on pressure tube fitness for service through Commission meeting items, the annual regulatory oversight report and other reporting mechanisms, as appropriate.

## Concluding Remarks

Canada has developed a nuclear industry we can all be proud of. The manner in which this issue has been addressed is another example of the commitment to safe operations that is part of the culture of the nuclear industry and the regulator.

In conclusion, the CNWC is in full support of CNSC Staff's recommendations.

Thank you for the opportunity to submit our thoughts on the proposed licence amendment.

I would once again like to use our submission as an opportunity to thank the Members of the Commission, CNSC Staff and all Intervenors. Strong regulatory oversight serves to protect the environment and maintain the high level of health and safety in our workplaces and our communities.

*RL Walker*

Bob Walker  
National Director  
Canadian Nuclear Workers' Council

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