



Date: 2023-08-02

File / dossier : 6.02.04

Edocs pdf : 7100767

**Written submission from the  
Provincial Building and  
Construction Trades Council  
of Ontario**

**Mémoire du  
Provincial Building and  
Construction Trades Council  
of Ontario**

**Bruce Power**

---

**Bruce Power Mid-Term Update of  
Licensed Activities**

**Bruce Power**

---

**Rapport de mi-parcours au sujet  
des activités autorisées de Bruce  
Power**

Commission Meeting

Réunion de la Commission

**September 20 and 21, 2023**

**Le 20 et 21 septembre 2023**



---

75 INTERNATIONAL BLVD., UNIT 401 - TORONTO, ON M9W 6L9 - TELEPHONE: (416) 679-8887 - FAX: (416) 679-8882

---

August 2, 2023

To: Canadian Nuclear Safety Commission (CNSC)  
280 Slater St.  
P.O. Box 1046 Stn. B  
Ottawa, ON – K1P 5S9  
[interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

Re: **Bruce Power's mid-term update (2023)**

To Whom It May Concern,

On behalf of the Provincial Building and Construction Trades Council of Ontario, I welcome the opportunity to share this written submission with the Canadian Nuclear Safety Commission (CNSC) regarding Bruce Power's mid-term update on licensed activities at the Bruce Power nuclear site. In 2018, our Council had the privilege of making oral presentations to the CNSC in Kincardine, Ontario, when Bruce Power was seeking to renew its operating license. Much progress has been made since that time, and we look forward to achieving new milestones together.

Our Council is an organization representing 15 construction craft unions with a total province-wide membership of 150,000 skilled trades workers who are employed in every bargaining sector of Ontario's construction industry, including the Electrical Power Systems sector where Bruce Power is a major owner/employer. We believe in constructive and ongoing dialogue and engagement with the owner, site contractors, workers, regulators, and the broader community with a view to assessing the economic, social, health and safety, and environmental impacts of Bruce Power's operations which is why we are pleased to be making this submission.

Electricity produced at the Bruce Power nuclear generating site accounts for approximately 30 percent of Ontario's energy mix, supplying a considerable share of safe, reliable and carbon-free energy that powers homes and businesses across our province. The eight CANDU units on-site sustain over 4,200 workers across a spectrum of professional skill-sets that include construction and maintenance expertise supplied by the construction craft trades that our Council represents.

Bruce Power's broader economic footprint in the community supports over 22,000 direct and indirect jobs, contributing \$4 billion annually to the economy in Ontario which we consider to be Canada's nuclear heartland. It is noteworthy that 90% of Bruce Power's capital and resource costs are spent inside Ontario, supporting businesses and families across an extensive domestic supply chain.

The Building Trades are actively involved in Bruce Power's Major Component Replacement (MCR) activities on six of the eight reactor units involving the removal and replacement of large nuclear components such as steam generators, vault pipework and other corollary systems such as steam turbines, cooling systems, electrical grids and instrumentation. The high-level of quality training and skills required to safely and successfully replace these major components demands great precision, dedication, and professionalism by experienced Journeypersons who specialize in their craft.

Ongoing Major Component Replacement work at Bruce Power also presents a fantastic opportunity for registered Apprentices to earn precious hours of on-the-job training and experience as they pursue a path towards earning their Certificates of Qualification (CofQs), becoming certified Journeypersons in their own right. In that sense, Bruce Power is a fabulous breeding ground for producing the next generation of exceptionally trained construction workers able to proudly apply their talents across a variety of jobs in the nuclear sector and beyond.

The Building Trades training model is predicated on a *safety first* philosophy which has been embraced by Bruce Power as well as our on-site contractor partners. In the trades, delivering training and mentorship through registered apprenticeship programs is intimately tied to safety performance and this is especially true in the nuclear sector. Preventing workplace injuries and fatalities is a commitment that is shared by the Building Trades, site contractors, and Bruce Power. We fully support the "As Low As Reasonably Achievable (ALARA)" principle when it comes to limiting radiation exposures, and we are absolutely committed to maintaining clear processes and lines of communication which allow workers to immediately report any unsafe practices without any fear of reprisals.

Furthermore, we believe that fair and balanced labour relations are at the heart of maintaining trust between the employer and employees. In that sense, the working relationships that have been established among members of Bruce Power's Joint Health and Safety Committee pursuant to Ontario's *Occupational Health and Safety Act* are a great source of workplace stability and mutual trust which has allowed for the Major Component Replacement work to unfold safely, efficiently, and without any major disruptions.

During the COVID-19 pandemic, when construction workers were declared to be 'essential' by the provincial government, immediate steps were taken to implement proactive safety protocols at the Bruce Power nuclear site. These measures were established through dialogue and consultation and they included physical distancing, staggered work schedules, and the wearing of added Personal Protective Equipment (PPE) which helped keep employees safe while continuing to perform critical work at the facility. Proactively, Bruce Power donated over 50,000 litres of hand sanitizer which the Provincial Building Trades Council helped distribute to all Local Building Trades Councils across Ontario, as well as to training centres and construction jobsites to help keep trainees and workers safe from the spread of the Coronavirus.

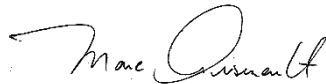
With regard to tackling climate change and advancing environmental stewardship, Bruce Power's aspirational goal of achieving net-zero Greenhouse Gas (GHG) emissions from its site operations by 2027, vying to become the first nuclear operator in North America to do so, is a target which our Council fully supports and applauds. This goal demonstrates an approach that

leads by example, which will hopefully spur other actors to embark on similar initiatives to support Canada's 'Net Zero by 2050' strategy.

Taken together, the productive partnerships between the Building Trades unions, site contractors and Bruce Power as an owner, have kept the nuclear facility on-track to continue its Major Component Replacement (MCR) work through the next several years, and we look forward to continued collaboration among the parties involved with a view to benefiting the people of Ontario by supplying them with clean, reliable, and low-cost electricity to help propel our economy forward.

If any members of the Canadian Nuclear Safety Commission or its staff wish to contact us for further comment or to address any questions that you may have, please feel free to reach us at (416) 679-8887 or at [marc@ontariobuildingtrades.com](mailto:marc@ontariobuildingtrades.com). Once again, we thank the Commission for allowing us to share our written feedback concerning Bruce Power's mid-term update, and we look forward to continued dialogue.

Respectfully submitted and with kindest regards,



Marc Arsenault,  
Business Manager and Secretary-Treasurer  
Provincial Building & Construction  
Trades Council of Ontario