



Date: 2023-08-03

File / dossier : 6.02.04

Edocs pdf : 7100780

**Written submission from  
Power Workers' Union**

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

**Bruce Power**

---

**Bruce Power**

---

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

**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

# Paliare Roland

Daniel Rosenbluth  
Paliare Roland Rosenberg Rothstein LLP  
155 Wellington St. West, 35<sup>th</sup> Floor  
Toronto, ON M5V 3H1

daniel.rosenbluth@paliareroland.com  
T. 416.646.6307 / F. 416.646.4301

File # 21488

August 3, 2023

**VIA EMAIL**

Senior Tribunal Officer, Registry  
Canadian Nuclear Safety Commission  
280 Slater St  
PO Box 1046 Stn B  
Ottawa ON K1P 5S9  
[interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

Dear Senior Tribunal Officer, Registry:

**Re: Request to intervene – Bruce Power mid-term update on licensed activities at the Bruce Nuclear Site – Ref. 2023-M-27**

I am counsel to the Power Workers' Union ("PWU"). I write to request that PWU be granted intervener status at the Canadian Nuclear Safety Commission ("CNSC") public meeting on September 20-21, 2023 in respect of the Bruce Power Mid-Term Update of Licensed Activities (the "Public Meeting").

The PWU requests to intervene by way of this written submission.

## **1. The PWU**

PWU members are employed throughout Ontario's electricity sector including at the Bruce A and Bruce B Nuclear Generating Stations ("BNGS"). The PWU has been the bargaining agent for the majority of employees at the BNGS since Bruce Power was formed 20 years ago and Ontario Power Generation (OPG)/Ontario Hydro before that. The majority of PWU-represented employees at Bruce Power live with their families in the surrounding communities.

The employees represented by the PWU at Bruce Power work in all facets of the facility, including operations, maintenance, emergency response, security, radiation protection, planning, administration, projects and modifications, and first line supervision. PWU members are the nuclear professionals on the "front line" of the day-to-day operations.

The PWU has been an active participant in the regulatory oversight process for nuclear facilities in the province of Ontario for decades. The PWU regularly participates in CNSC public hearings and

# Paliare Roland

meetings for all of Ontario's nuclear generating sites as well as Canadian Nuclear Laboratories ("CNL") facilities. This includes participation in Bruce Power's recent application to the CNSC to amend its Power Reactor Operating Licence ("PROL") to permit the production of Lutetium-177.

## **2. *The BNGS***

The BNGS is located in Kincardine, Ontario. Currently, the site has eight CANDU reactors in operation with a total capacity of more than 6,300 MW. Bruce Power generates enough electricity to reliably supply more than 30% of Ontario's electricity demands.

Bruce Power's Major Component Replacement (MCR) Program is well underway and will enable the current units to continue supplying that electricity well into the 2060s.

## **3. *CNSC Staff's assessment of Bruce Power's activities during the licence period***

The PWU supports the assessment of CNSC Staff as set out in CMD 23-M27. Specifically:

- a) CNSC Staff found that Bruce Power's safety performance has remained stable, and that Bruce Power has conducted licenced activities in accordance with regulatory requirements;
- b) CNSC Staff concluded that Bruce Power's engagement and communication efforts with the Saugeen Ojibway Nation, Georgian Bay Métis Nation of Ontario, and the Historic Saugeen Métis peoples have met staff's expectations; and
- c) CNSC Staff found that Bruce Power has continued to protect the health and safety of the public and the environment near the BNGS.

## **4. *Additional PWU submissions***

The PWU is proud of its role at Bruce Power and the strong record on safety that has been achieved at BNGS.

As catalogued in detail in Bruce Power's submission in CMD 23-M27.1, Bruce Power has a demonstrated track record of excellence in all applicable regulatory performance measures in relation to occupational health and safety.

This excellent track record on health and safety is due in part to the leadership of PWU at Bruce Power, which has led to the development of mature safety mechanisms in collaboration with workers and the operator, all under the purview and regulation of the CNSC.

For example, Bruce Power has a Joint Health and Safety Committees ("JHSC") operating in its

# Paliare Roland

workplace as the main bilateral group responsible for health and safety issues. PWU representatives, supported by local PWU leadership and staff, are key members of the JHSC, which has developed robust processes for investigating safety incidents. The JHSC has been in place at all times during the licence period and is expected to remain in place throughout the remaining term of Bruce Power's PROL.

Bruce Power features other health and safety committees in the workplaces such as the Outage Dose Reduction Committee, which is described in more detail in CMD 23-M27.1.

The PWU believes that the nuclear generation of electricity plays a crucial role in the path to a net zero economy in Canada and in particular Ontario. The PWU is proud to play an active role in that journey across Ontario, including in collaboration with Bruce Power at the BGNS.

In sum, the PWU is in full support of Bruce Power's ongoing activities at the BGNS and believes that Bruce Power has been responsibly implementing its PROL during the first half of the licence period.

We would like to take this opportunity to thank the Commission and CNSC staff. Your continuing oversight is fundamental to the maintenance of a safe and healthy workplace and community for our members.

Yours very truly,  
Paliare Roland Rosenberg Rothstein LLP



Daniel Rosenbluth  
DR:DR