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Oral presentation

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

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

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



Canadian Nuclear Workers' Council

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August 03, 2023

Members of the Commission

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Reference 2023-M27

Bruce Power Mid-Term Update of Licensed Activities at the Bruce Nuclear Site.

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 Public Meeting scheduled for September 20-21, 2023 regarding the Bruce Power Mid-Term Update of Licensed Activities at the Bruce Nuclear Site.

We also request an opportunity to make an oral submission at the public meeting.

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as an association of Unions with Members employed in 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.

Specific to this submission, CNWC Affiliates include the Power Workers' Union, the Society of United Professionals and a number of Unions that are members of the Provincial Building and Construction Trades Council of Ontario.

In addition, Regional Labour Councils in a number of nuclear host communities are CNWC Affiliates, including the Grey Bruce Labour Council.

Some CNWC Affiliates have also provided submissions for this public meeting.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard,
- 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 engages in a number of activities to further these goals such as our newsletter and website <https://cnwc-cctn.ca/>. We also hold an annual conference for CNWC Affiliates at locations that are rotated amongst the various communities hosting Canada's nuclear facilities. We have held conferences in the vicinity of Bruce Power and had opportunities to tour the Bruce Site. Most recently, we held our 2018 conference in Kincardine. CNWC conferences provide a great opportunity for Affiliates to tour the broad spectrum of Canada's nuclear facilities and learn more about our nuclear industry. It's fair to say, everyone that has an opportunity to tour the Bruce Nuclear Site is impressed.

Safeguarding the continued health and safety of Workers is a priority for all CNWC Affiliates. This has led to consistently high standards of occupational health and safety and environmental stewardship in Canada's nuclear industry. Safer workplaces give rise to safer communities. There is nothing more important than this for the CNWC, CNWC Affiliates and their Members.

The CNWC is a regular participant in this regulatory process. We participated in the 2018 public hearings on the renewal of Bruce Power's Power Reactor Operating Licence (CMDs 15-H2.111 and 15-H2.111A) and we've maintained our involvement with updates in the interim.

In preparation for this submission we reviewed the Commission Member Documents (CMD) found on the CNSC website, CMD 23-M27 submitted by CNSC Staff and CMD 23-M27.1 submitted by Bruce Power.

Bruce Power

Throughout the first 5 years of the current 10-year licence period (October 1, 2018 to September 30, 2028), Bruce Power has complied with the conditions of their licence and continuously demonstrated good safety performance. CMD 23-M27.1 provides a great overview of all the activities at the Bruce Nuclear Site over the last 5 years. It's hard not to be impressed by it. Bruce Power and their employees are clearly committed to protecting the health and safety of people and the environment. We are in complete concurrence with Bruce Power's submission and would like to note a few highlights: strong operational performance, demonstrating pressure tube integrity, development of the isotope production system, and demonstrating the effectiveness of their emergency response program.

CNSC Staff's Assessment on Bruce Power

We are in full support of CNSC Staff's assessment of Bruce Power's overall performance over the first 5 years of its current 10-year licence period as well as the licencing updates and activities set out in CMD 23-M27. Specifically: CNSC oversight confirmed that Bruce Power's safety performance remained stable, Bruce Power conducted licensed activities in accordance with regulatory requirements and Bruce Power continued to protect the health and safety of the public and the environment near the Bruce Site. We would also like to note the numerous activities undertaken by CNSC Staff related to regulatory oversight, compliance verification and engagement. This work is very much appreciated.

Concluding Remarks

Bruce Power has a proven history as a responsible Nuclear Operator. In our submissions to the CNSC in 2018, the CNWC was in complete support of renewing Bruce Power's Power Reactor Operating Licence (PROL) for a 10-year term with a mid-term update to be provided by Bruce Power at a public meeting. We continue to support that position and fully anticipate the same high level of performance for the remainder of the term of their PROL.

This is outside the CNSC's mandate but we would like to highlight how important clean and reliable nuclear energy is for Canada's clean energy transition. As noted by Bruce Power in their submission, they provide 30% of Ontario's electricity. They also employ about 4,200 people and support businesses across Ontario. A lot of work has been done by Bruce Power to increase the local presence of the nuclear supply chain and increase local employment opportunities. We would like to applaud Bruce Power for their continuous efforts to inform and engage the community as well as for their leadership in advancing the production and use of medical isotopes in Canada. Bruce Power has demonstrated what a good corporate citizen and community partner can look like. The result has been a high level of community support for Bruce Power.

A 10-year PROL with a mid-term update from the licensee as well as annual regulatory oversight reports from CNSC Staff work well together to provide a very high level of confidence and engagement. We applaud this approach.

Thank-you to the Commission, CNSC Staff and everyone participating in this process. A transparent public process and strong regulatory oversight help maintain the high level of health and safety in our workplaces and our communities.

Respectfully submitted,

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