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

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

Canadian Nuclear Laboratories

Mid-Term Update of Licensed
Activities for the Chalk River
Laboratories Site and Regulatory
Oversight Report for Canadian Nuclear
Laboratories Sites: 2022

Laboratoires Nucléaires Canadiens

Rapport de mi-parcours au sujet des
activités autorisées sur le site des
Laboratoires de Chalk River et Rapport de
surveillance réglementaire des sites des
Laboratoires Nucléaires Canadiens : 2022

Commission Meeting

Réunion de la Commission

November 1-2, 2023

1-2 novembre 2023



Canadian Nuclear Workers' Council

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October 02, 2023

Members of the Commission

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Reference 2023-M 30

CNSC Staff Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2022 and Mid-Term Update from Canadian Nuclear Laboratories for the Chalk River Laboratories 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 November 1, 2023 regarding CNSC Staff's Regulatory Oversight Report (ROR) for Canadian Nuclear Laboratories Sites: 2022 and the Mid-Term Update on Licensed Activities at the Chalk River Laboratories (CRL) Site from Canadian Nuclear Laboratories (CNL).

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 represent Workers across Canada's nuclear industry, including: uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning. In addition, Regional Labour Councils in a number of nuclear host communities are CNWC Affiliates.

CNWC Affiliates include Unions at CNL: locals of the United Steel Workers (USW), the Chalk River Professional Employees Group (CRPEG) represented by the Professional Institute of the Public Service of Canada (PIPSC), the Power Workers Union (PWU), the

International Brotherhood of Electrical Workers (IBEW), the International Association of Fire Fighters (IAFF) and Unions affiliated with the Provincial Building and Construction Trades Council of Ontario.

To help ensure the perspectives of our Affiliates are heard we prepare policy papers and a regular newsletter, post relevant information on our website <https://cnwc-cctn.ca/>, hold annual conferences at various communities hosting Canada's nuclear facilities, and participate in the regulatory process.

The standards of occupational health and safety and environmental stewardship in Canada's nuclear facilities are very high. Safeguarding the continued health and safety of Workers is the highest priority for all CNWC Affiliates. We know that safer workplaces give rise to safer communities. There is nothing more important.

The CNWC has been regularly monitoring the progress at all of CNL's sites with information provided by both CNL and the CNSC. In preparation for this submission we also reviewed the Commission Member Documents (CMD) found on the CNSC website, CMD 23-M30 (Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2022) submitted by CNSC Staff and CMD 23-M30.1 (Mid-Term Update of Licensed Activities for the Chalk River Laboratories Site) submitted by CNL.

We are in full support the submissions from both CNSC Staff and CNL. We support CNL's ongoing activities at all CNL Sites including the CRL Site. We have confidence that CNL will continue to operate the CRL Site responsibly for the remainder of the 10-year CRL Nuclear Research and Test Establishment Operating Licence.

Concluding Remarks

As you may have read in previous CNWC submissions, we believe a 10-year Licence 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 continue to 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,

RL Walker

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