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

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

**Regulatory Oversight Report for  
Uranium and Nuclear Substance  
Processing Facilities in Canada: 2022**

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**Rapport de surveillance réglementaire  
des installations de traitement de  
l'uranium et des substances nucléaires  
au Canada : 2022**

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Commission Meeting

Réunion de la Commission

December 13-14, 2023

13-14 décembre 2023



## Canadian Nuclear Workers' Council

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October 30, 2023

Members of the Commission

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### **CNSC Staff's Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2022 Reference 2023-M 35**

Dear President Berube 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 December 13/14, 2023 regarding CNSC Staff's Regulatory Oversight Report (ROR) for Uranium and Nuclear Substance Processing Facilities in Canada: 2022, reference CMD 23-M 35.

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

The CNWC was formed in 1993 as an association of Unions with Members employed in Canada's nuclear industry. Unions affiliated with the CNWC 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, District Labour Councils in a number of nuclear host communities are CNWC Affiliates.

Specific to this submission CNWC Affiliated Unions represent Workers at the Uranium Processing Facilities: Cameco Fuel Manufacturing, Cameco Port Hope Conversion Facility and BWXT Nuclear Energy Canada (NEC). Workers at Cameco Fuel Manufacturing in Port Hope and Cobourg and the Cameco Port Hope Conversion Facility are represented by locals of the United Steel Workers (USW) and Workers at BWXT NEC in Toronto and Peterborough are represented by locals of UNIFOR and the International Federation of

Professional and Technical Engineers (IFPTE). Additionally, the Lindsay and District Labour Council and the Northumberland Labour Council are CNWC Affiliates.

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> and social media, hold annual conferences at the various communities hosting Canada's nuclear facilities, and participate in the regulatory process. Our 2023 conference was held at the Darlington Nuclear Information Centre on October 16-18 and was well attended.

The standards of occupational health and safety and environmental stewardship in Canada's nuclear industry are consistently very high and safeguarding those high standards is paramount for all CNWC Affiliates. When our workplaces are safe it's better for the environment and we know that safer workplaces give rise to safer communities. Nuclear Workers live, work and play in our nuclear host communities along with our families and friends. This is important for all of us.

In preparation for this submission we reviewed Commission Member Document, CMD 23-M 35 (Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2022) submitted by CNSC Staff.

We are in full support of CNSC Staff's assessment and their conclusion that Uranium and Nuclear Substance Processing Facilities (UNSPF) in Canada continue to operate safely. In 2022 the performance ratings for all UNSPFs in all 14 SCAs were rated as "satisfactory". Radiation protection programs, environmental protection programs and conventional health and safety programs were all effective.

### **Concluding Remarks**

We believe that Cameco and BWXT continue to make adequate provisions for the health, safety and security of workers, the public and the environment.

We value the CNSC Staff's Annual Regulatory Oversight Reports. They help maintain confidence and engagement.

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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