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

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

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Regulatory Oversight Report for  
Canadian Nuclear Power Generating  
Sites: 2022 and Mid-term update for  
Ontario Power Generation's Pickering  
Nuclear Generating Station

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Rapport de surveillance réglementaire  
des sites de centrales nucléaires au  
Canada : 2022 et Rapport de mi-parcours  
d'Ontario Power Generation pour la  
centrale nucléaire de Pickering

Commission Meeting

Réunion de la Commission

**December 13 and 14, 2023**

**13 et 14 décembre 2023**



## Canadian Nuclear Workers' Council

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October 30, 2023

Members of the Commission

c/o Tribunal Officer, Commission Registry  
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### **CNSC Staff's Regulatory Oversight Report for Canadian Nuclear Generating Sites for 2022      Reference 2023-M 36**

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 Canadian Nuclear Generating Sites for 2022, reference CMD 23-M 36.

#### **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 all of Canada's Nuclear Generating Sites. This encompasses the Nuclear Power Plants (NPP) and the Waste Management Facilities (WMF) on their sites. Workers at N.B. Power's Point Lepreau Nuclear Generating Station (NGS) are represented by the International Brotherhood of Electrical Workers, IBEW Local 37. Workers at OPG's Pickering NGS, OPG's Darlington NGS and Bruce Power are represented by the Power Workers' Union, the Society of United

Professionals and Member Unions of the Provincial Building and Construction Trades Council of Ontario. Additionally, the Durham Region Labour Council, the Grey-Bruce Labour Council and the Saint John District 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 very well attended.

The standards of occupational health and safety and environmental stewardship at Canada's NPPs are second to none and safeguarding those high standards is paramount. Canada's nuclear workers are very well trained and have the confidence to ask questions. 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 CNSC Staff's Regulatory Oversight Report for Canadian Nuclear Generating Sites for 2022, CMD 23-M 36.

We are in full support of CNSC Staff's assessment and their conclusion that Canada's nuclear power plants (NPPs) and the waste management facilities (WMFs) on their sites continued to operate safely during 2022. Radiation protection programs, environmental protection programs and conventional health and safety programs were all effective.

### **Concluding Remarks**

We believe that N.B. Power, OPG and Bruce Power continued to operate safely in 2022 and made 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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**Reference 2023-M36**

### **OPG Mid-Term Update for the Pickering Nuclear Generating Station**

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 Ontario Power Generation's (OPG) Mid-Term Update for the Pickering Nuclear Generating Station (NGS).

### **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.

At the Pickering Nuclear Generating Station 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, the Durham Region Labour Council is affiliated with the CNWC.

To help ensure the perspectives of our Affiliates are heard the CNWC prepares policy papers and a regular newsletter, post relevant information on our website <https://cnwc-cctn.ca> and social media, and hold annual conferences at the various communities hosting Canada's nuclear facilities. The 2023 CNWC conference was held at the Darlington Nuclear Information Centre which presented an opportunity to tour the Darlington Station, the Simulator, the Waste Management Facility and the Refurbishment Mock-up facility. CNWC conferences provide a great opportunity for Affiliates from across Canada's nuclear industry to learn more about the broader industry they're all part of.

Safeguarding the health and safety of Workers is paramount for all CNWC Affiliates. This has led to consistently high standards of occupational health and safety and environmental stewardship across Canada's nuclear industry. Canada's nuclear workers are very well trained and have the confidence to ask questions or raise concerns. 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 their families and friends. Nothing is more important to any of us than operating to the highest standards.

The CNWC is a regular participant in this regulatory process. We participated in the 2018 public hearings on the renewal of the Pickering Nuclear Power Plant's (NPP) Power Reactor Operating Licence (PROL) and we've continued to monitor activities at the Pickering NPP in the interim.

In preparation for this submission we reviewed OPG's Pickering Nuclear Generating Station: Mid-Term Update as found on OPG's website and CMD 23-M36 Appendix H submitted by CNSC Staff.

### **OPG - Pickering**

Throughout the first 5 years of the current 10-year licence period (August 31, 2018 to August 31, 2028), OPG has complied with the conditions of their licence and continuously demonstrated good operational and safety performance. OPG's Mid-Term Update provides a great overview of the activities at Pickering over the last 5 years. The Pickering NGS is demonstrating its strongest performance ever. This includes its highest yearly production output and its best equipment reliability ratings. Pickering's strong operational and safety performance has been recognized by industry peers. OPG and the people working at Pickering are clearly committed to the highest operational standards and protecting the health and safety of people and the environment. We are in complete concurrence with OPG's submission.

## **CNSC Staff's Assessment of Pickering**

We fully support CNSC Staff's assessment of Pickering's overall performance during the first 5 years of its current 10 year licence as well as the updates noted in CMD 23-M 36 Appendix H. We also support CNSC Staff's conclusions that OPG has continuously operated the Pickering NGS in accordance with regulatory requirements, maintained satisfactory performance across all safety and control areas (SCAs), with the exception of findings in the Security SCA, and continue to protect the health and safety of the public and the environment.

We thank CNSC Staff for their numerous oversight and engagement activities. Your work is appreciated.

## **Concluding Remarks**

OPG has a long history of responsible nuclear operations. In our submissions to the CNSC in 2018, the CNWC was in support of renewing Pickering's Power Reactor Operating Licence (PROL) for a 10-year term with a mid-term update to be provided by OPG 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.

Pickering generates the clean and reliable electricity that Canada needs and supports high-quality local employment. We plan to fully participate in any discussions on the future of the Pickering NGS.

A 10-year PROL with a mid-term update from the licensee and 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,

Bob Walker  
National Director  
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