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**Written submission from
Wolastogey Nation**

**Mémoire de la nation
Wolastogey**

**Regulatory Oversight Report
for Canadian Nuclear Power
Generating Sites for 2023**

**Rapport de surveillance
réglementaire des sites
nucléaires pour 2023**

Commission Meeting

Réunion de la Commission

February 25, 2025

Le 25 février 2025

October 16, 2024

Ms. Louise Levert

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission

Re: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2023

Dear Ms. Levert and members of the Commission:

The Wolastoqey Nation in New Brunswick (“**WNNB**”) provides technical assistance, advice and support to New Brunswick’s six Wolastoqey (Maliseet) communities on matters pertaining to their Aboriginal and Treaty Rights and Title. We work to protect the lands and waters upon which these rights are based, and promote the practice of Wolastoqey rights, language, and culture. The WNNB is not the rightsholder or the body to which the Duty to Consult is owed. However, where directed to do so, we will prepare responses on behalf of our member communities.

The WNNB undertook a review of the Canadian Nuclear Safety Commission’s (“**CNSC**”) *Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2023*. Our review focused specifically on the components of the report pertaining to the Point Lepreau Nuclear Generating Station (“**PLNGS**”) in New Brunswick. New Brunswick Power (“**NBP**”) operates PLNGS on unceded, unsurrendered land and water along the Fundy Coast in southwest New Brunswick and is subject to an Aboriginal Title Claim filed by the Wolastoqey Nation on December 1, 2020.

Overall, CNSC staff feel that NBP is meeting its regulatory requirements regarding the PLNGS, however, it is apparent that there are several areas where NBP could improve its performance. Although these areas are often rated as “low” or “negligible” safety significance by the CNSC, we are concerned that small issues will become large issues over time if they are allowed to propagate. Therefore, we provide comments and recommendations where we feel that NBP can reach a higher standard of safety at PLNGS.

Our comments related to the 2023 Regulatory Oversight Report are detailed below. Please be advised that the WNNB will not be making an oral presentation to the Commission on this report.

2.7.2 Human Performance Management

Although PLNGS performance was deemed satisfactory by CNSC, we observed that a contractor was allowed to perform work without the proper training and some workers in safety-sensitive positions exceeded their hours of work limits. The reason for such negligence was not given in the report.

WNNB would like the report to highlight and expand on what was done to prevent such incidents from reoccurring.

2.7.8 Conventional Health and Safety

WNNB observed that workers’ conventional safety for Accident Frequency (AF) at PLNGS was higher than the industry average. Although there were no fatalities, lost-time injuries or disabling injuries recorded,

the AF increased from the 2022 numbers. A total of 5 medically treated injuries (e.g., body twist, slipping and finger injuries) were recorded in LPNG.

WNNB would like to see some measures put in place to help mitigate this trend and significantly bring down these numbers.

F3: Safety System Test Performance

It was observed that PLNG had the highest number of uncompleted Special Safety System test. PLNG's number (2) was double that of BNGS B (1) and those were the only NPPs that experienced uncompleted Safety System test.

PLNGS performance in this area should be monitored more closely.

Closing

Thank you for the opportunity to provide comment on the 2023 Regulatory Oversight Report for Nuclear Power Generating Sites. We look forward to receiving feedback from the CNSC and NB Power on our comments, and further opportunities to discuss safety at the Point Lepreau Nuclear Generating Station.

Woliwon / Wəliwən,

Andrew Uraih

Wolastoqey Nation in New Brunswick

Energy Lead

cc: Louise Levert, Senior Tribunal Officer, Commission Registry, CNSC

Laura DeCoste, Policy Officer, Indigenous and Stakeholder Relations Division, CNSC

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