

SUBMISSIONS OF THE POWER WORKERS' UNION TO THE CANADIAN NUCLEAR SAFETY COMMISSION

REGARDING DISCUSSION PAPER 16-05, Human Performance

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Chris Dassios - General

Counsel

Bob Walker - VP, Sector 1

Power Workers' Union

244 Eglinton Ave. East

Toronto ON M4P 1K2

T: 416-322-2444

F: 416-322-2436

E: dassiosc@pwu.ca bwalker@pwu.ca

Emily Lawrence

External Counsel

Paliare Roland Rosenberg Rothstein LLP

155 Wellington Street West, 35th fl.

Toronto, ON M5V 3H1

T: 416-646-7475

F: 416-646-4301

E: Emily.Lawrence@paliareroland.com

SUBMISSIONS OF THE POWER WORKERS' UNION ON THE DISCUSSION PAPER 16-05, *Human Performance* February 15, 2017

A. Overview

- 1. The Power Workers' Union ("PWU") has reviewed the Discussion Paper 16-05 addressing human performance and human performance programs developed by the Canadian Nuclear Safety Commission (the "Commission")
- 2. The PWU is a trade union which represents over 15,000 workers employed in Ontario's power sector, most of whom are employed in the nuclear power industry. Its members work throughout Ontario and make up a large majority of employees in the nuclear power industry, including certified staff and other employees at Ontario's nuclear power plants, Darlington Nuclear Generating Station, Pickering Nuclear Generating Stations A and B, and Bruce Power Generating Stations A and B. PWU members also form the majority of workers employed at Ontario's other electrical generating facilities, as well as transmission and local distribution companies.
- 3. PWU members include employees of licensees who work on safety-related systems or perform safety-related tasks with the potential for immediate and direct effect on safety. As an external stakeholder who represents employees in nuclear facilities, the PWU has an important role to play in ensuring that Ontario's nuclear facilities are safe and secure. The PWU has and will continue to work with licensee employers to develop and implement effective policies regarding human performance.
- 4. The Discussion Paper provides a broad overview for defining human performance and analysing components of human performance programs. The PWU has no comments at this time on the Discussion Paper, given its overview nature.
- 5. The PWU anticipates that it will have comments on future regulatory documents regarding human performance as the Commission develops and publishes them, and reserves its rights to do so. The PWU requests that it be kept apprised of future developments on this Discussion Paper and any regulatory documents which flow from it.