

## INTERNATIONAL BROTHERHOOD OF BOILERMAKERS LOCAL 128

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CNSC-CCSN
5955118

Doc# N° de document

ADMIN 2019JUL 1710:47

Mr. B. Torrie

July 15, 2019

Director General, Regulatory Policy Directorate Canadian Nuclear Safety Commission P.O. Box 1046 280 Slater Street Ottawa, ON K1P 5S9

Dear Mr. Torrie,

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REFERRED TO REFERE A	Torrie, B

## Re: Proposed Amendments to the Radiation Protection Regulations

I submit this letter in order to present our concerns regarding the proposed amendments to the Radiation Protection Regulations published in the Canada Gazette. Prior to these changes being adopted, further discussion with all parties involved is required to understand the full impact of the proposed changes concerning lens of the eye dose limits and how the associated dose is calculated and assigned.

First and foremost, I must make emphatically clear that my number one concern is the health and safety of every Boilermaker in the field. If the proposed amendments are shown to protect my member's health and safety, I am in full support. If, on the other hand, the amendments are presented from a merely administrative perspective, we must take a closer look at the impact this will have on our work force and their ability to remain employed within the energy sector.

To my knowledge there was no consultation with skilled trade unions, specifically Boilermakers L128. I respectfully request we remedy this going forward and encourage in-depth discussions involving all those who wish to participate from within the Unions, company/contractors and owner/operators.

Please contact me if you have any questions regarding this submission.

Thank you,

STIRLING MUNN

President &

Energy Sector Representative BOILERMAKERS LOCAL 128

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