

# PALIARE ROLAND

BARRISTERS

May 3, 2016

## VIA EMAIL

Canadian Nuclear Safety Commission  
Headquarters  
280 Slater Street  
P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

Dear Commission Staff:

### Re: **Feedback on Submissions Made in respect of Reg Doc 2.2.4**

We act for the Power Workers' Union ("PWU"). The PWU recently made lengthy submissions in respect of the draft Regulatory Document 2.2.4.

The PWU has now reviewed the submissions of other stakeholders received by the Commission in the consultation process. While we do not intend to reiterate the PWU's past submissions, we note that the submissions make clear that numerous industry stakeholders (including licensee/employers, unions, the Canadian Human Rights Commission) have raised significant concerns about the scope and breath of the Regulatory Document, and about its implementation and its legality.

The Commission's proposals are deeply flawed. The consultation process reveals that the proposals lack support from any credible industry participant, and that no industry participant has identified the existence of a problem with drug and alcohol use in nuclear facilities to which the Regulatory Document is intended to address. On the other hand, licensees have identified significant cost consequences for licensees that would result from the Commissions' proposals. It is inappropriate to burden electricity consumers with additional energy costs arising from this flawed and unnecessary proposal.

The PWU submits that portions of the draft Regulatory Document relating to random drug and alcohol testing and increased psychological testing should be rejected and discarded. Should the Commission persist in its assessment of these aspects of the draft Regulatory Document, the PWU submits that the Commission should consider further evaluation, stakeholders meetings, and legal review before finalizing the Regulatory Document.

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File 20209

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(1934 - 2006)

We look forward to receiving an update from the Commission on this matter.

Yours very truly,

**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**

*for: Emily Lawrence*

Emily Lawrence

c. C. Dassios, PWU

Doc 1803889 v1