



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

**ON REGULATORY DOCUMENT 2.9.1: Environmental Protection:
Environmental Assessments**

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**SUBMISSIONS OF THE POWER WORKERS' UNION
ON REGULATORY DOCUMENT 2.9.1: Environmental Protection: Environmental
Assessments**

A. Overview

1. The Power Workers' Union ("PWU") has prepared these submissions in respect to the draft Regulatory Document 2.3.1: *Environmental Protection: Environmental Assessments* (the "Draft Regulatory Document"), developed by the Canadian Nuclear Safety Commission (the "CNSC" or the "Commission") regarding the proposed requirements for the environmental assessment process.
2. The PWU supports the CNSC's initiative for a comprehensive framework for best practices and guidelines for the environmental assessments ("EAs"), and in particular for its commitment to a transparent process in which stakeholders are encouraged to participate.

B. The PWU

3. 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.
4. PWU members work in all facets of Ontario's nuclear generating facilities, including operations, administration, maintenance, security, projects and modifications, and first line supervisors. Members of the PWU and their families live in communities near Ontario's nuclear power plants, and are committed to ensuring that new nuclear projects are safe.

5. As an external stakeholder who represents employees in nuclear reactors, the PWU has an important role to play in ensuring that nuclear projects are undertaken in a manner that protects the environment, the public and its members.

6. The PWU has been an active participant in the regulatory oversight of nuclear safety issues. Over the last two decades, PWU has made numerous submissions/presentations to various bodies, including:

- a. a Joint Review Panel on the OPG Darlington Nuclear Power Plant Project;
- b. a Joint Review Panel on the Deep Geologic Repository Project;
- c. to the Canadian Nuclear Safety Commission (“CNSC”) regarding
 - i. the Operating Licence renewals for Pickering A, B and Darlington NGS;
 - ii. the refurbishment of Pickering B; and
 - iii. the Operating Licence renewals for Bruce Power A and B;
 - iv. the restart of Units 3 and 4 at Bruce A;
 - v. the environmental assessment of the Pickering A restart; and
 - vi. numerous draft regulatory documents;
- d. the federal Environmental Assessment Review Panel regarding nuclear fuel waste;
- e. the Atomic Energy Control Board with respect to accountability in nuclear performance;
- f. the Atomic Energy Control Board and CNSC with respect to various relicensing applications at the Bruce, Darlington and Darlington nuclear facilities; and
- g. the Ontario Legislature Select committee on Ontario Hydro Nuclear affairs.

C. The PWU’s Position on the Regulatory Document

7. The PWU’s submissions focus on the importance of public participation in the EA process. The PWU’s position is that the public and stakeholders should be given opportunities to participate in the EA process during the technical review of an

applicant's EA-related documentation and to review and comment on the EA Conclusion. This is particularly so for stakeholders who have a specific and direct interest in the outcome of such EAs.

8. The PWU notes that Appendix B to the Draft Regulatory Document sets out the criteria used to assess the level of public participation. The PWU does not have comments on the criteria used, but takes the view that the Commission should opt for more public participation and not less, in most cases.

9. Moreover, the PWU supports the use of open houses, workshops and roundtable discussions as part of a robust EA consultation process.

10. The PWU also supports the continued use of the Commission funding program to facilitate public involvement in the EA process.

11. As a technical matter, the PWU requests that the Commission consider making materials for EAs more easily available on its website.

12. The PWU thanks the Commission for the opportunity to make submissions on this Draft Regulatory Document.