



**Written submission from the
International Brotherhood of
Boilermakers**

**Mémoire de
International Brotherhood of
Boilermakers**

In the Matter of

À l'égard de

**Bruce Power Inc. – Bruce A and B
Nuclear Generating Station**

**Bruce Power Inc. - Centrale nucléaire de
Bruce A et Bruce B**

Request for a ten-year renewal of its Nuclear
Power Reactor Operating Licence for the
Bruce A and B Nuclear Generating Station

Demande de renouvellement, pour une période
de dix ans, de son permis d'exploitation d'un
réacteur nucléaire de puissance à la centrale
nucléaire de Bruce A et Bruce B

Commission Public Hearing – Part 2

**Audience publique de la Commission –
Partie 2**

May 28-31, 2018

28-31 mai 2018



INTERNATIONAL BROTHERHOOD OF BOILERMAKERS

Joseph Maloney, M.S.C., International Vice President

boilermaker.ca

March 6, 2018

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

To whomever it may concern:

**Intervention re. Ref. 2018-H-02, Bruce Power Inc.,
Application to renew Nuclear Power Reactor Operating License,
Bruce Nuclear Generating Stations A and B**

We wish to request to intervene in the above-mentioned Application in support of the renewal of Bruce Power's Reactor Operating License as cited above. Our intervention will be by way of this written submission.

The names and contact information of the requestors are as follows:

Joseph Maloney, M.S.C.
International Vice-President
International Brotherhood of Boilermakers
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The IBB and Bruce Power

Members of the International Brotherhood of Boilermakers (IBB) have been working at Stations A and B since construction started in 1970. Our members have performed key roles in the construction, maintenance and refurbishment of the Stations. Our role includes, but is not limited to:

- Pressure welding. Our members weld key components in reactors, transmission and storage vessels that handle steam under high pressure.
- Rigging. Our members rig massive plant components, such as cooling towers, turbines and reactors, for movement in preparation to either install or remove them.
- Fitting. Boilermakers are responsible for installing these components, often to tolerances of thousandths of an inch.
- Steam generation. Boilermakers construct, maintain, refurbish and repair the reactor and turbine components that generate the power produced by the Stations.

In 2017, Boilermakers worked an estimated total of more than 430,000 hours at Stations A and B, injecting more than \$20 million into the economies of the surrounding communities in the form of wages.

The IBB works closely with Bruce Power Inc., its contractors and its employees on both refurbishment and day-to-day maintenance. Our working relationship has grown and deepened over almost 50 years. Our members have vast experience in working on Stations A and B and our experience with Bruce Power Inc. has shown us that the company is dedicated to safety, supporting the surrounding community and the protecting the environment.

Thanks to the commitments of Bruce Power and our own union to workplace safety, there has never been an accident causing major injury or loss of life at the project, and workplace injuries of any kind are rare. Bruce Power's responsible and respectful approach to the safety of our members has been a major contributor to the excellent working relationship we have enjoyed with the company over the years.

The IBB strongly supports the company's Application for license renewal as a result of our experience and its performance in delivering more than a third of Ontario's electrical production (2015). The facility has an outstanding record of safe and reliable operations: in 1981, Bruce A 1 was ranked the top reactor in the world with a 97% availability factor; in 1982, Unit 3 set a then world record of 494 days of continuous operation; and as of 1984, Bruce A was the most reliable multi-unit station in the world. While mechanical and software malfunctions have periodically taken some units out of service, the facility as a whole has maintained its record as one of the world's safest and most reliable.

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Community engagement

Throughout its history, Bruce Power Inc. has been committed to engaging with the community. As the region's biggest employer, with nearly 4,000 employees, Bruce Power has been an excellent corporate citizen. Its relationship with our union, and with other unions on the site, has been built on mutual respect and trust.

In addition, the company has encouraged community involvement in the regulatory process and supports the surrounding communities through education, training, healthcare and other initiatives. For example, every year, Bruce Power provides \$25,000 in Grade 8 and high school commencement awards, \$5,000 in scholarships to encourage students to pursue education in the building trades, \$20,000 to indigenous scholarships and \$6,000 to the Youth Indigenous Scholarship Fund. As part of its healthcare initiatives, Bruce Power has helped raise more than \$3 million to fund programs operated by Grey Bruce Health Services and to raise money for local hospitals. In 2017, the company donated \$350,000 to health and wellness initiatives alone.

In terms of the environment, Bruce Power shares thorough information with the community, including but not limited to the results of regular Environmental Risk Assessment and Predictive Effects Assessment reports. All monitoring activity has shown that the nuclear plant has had a very low environmental impact and there are no predicted radiological or non-radiological risks to human and ecological health.

In addition to Bruce Power's community initiatives, the IBB also engages with nearby communities and First Nations. We encourage First Nations youth to consider a career in the skilled trades, and are working on developing a system that will encourage members of the Saugeen Ojibway Nation to enter our apprenticeship system. We support hiring qualified local journeypersons and apprentices, and support programs to get more women and youths involved in our trade.

The CNSC process

We support the rigorous and comprehensive review process through which the CNSC will decide the outcome of Bruce Power's Application to renew its operating license.

While the CNSC's Rules of Procedure require 60 days' notice of a public hearing, the CNSC provided more than six months' notice of the first hearing on Bruce Power's Application; this for an established project, the parameters of which have long been understood and accepted by both the Commission and the public.

In addition, the CNSC has pledged to extend the review process if a significant concern is raised by the community for which more consideration is required.

Through its well-publicized Participant Funding Program, the CNSC offers interested parties in the community significant opportunities to research and bring to light specific concerns related to any Application.

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The IBB commends the thoroughness of the CNSC's review process and is confident that every interested party has had adequate time and opportunity to present their case.

Conclusion

For all of the above reasons, the IBB strongly supports Bruce Power Inc.'s Application for a ten-year renewal of its operating license. All of which is submitted with respect.

Sincerely,



Joseph Maloney, M.S.C.
International Vice President for Canada
International Brotherhood of Boilermakers



John Petronski
Business Manager/Secretary-Treasurer
Boilermakers Local 128