Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

CMD 18-H4.61

File / dossier: 6.01.07
Date: 2018-04-16
Edocs: 5509531

Oral Presentation

Submission from the Society of United Professionals

In the Matter of

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

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

Commission Public Hearing – Part 2

May 28-31, 2018

Exposé oral

Mémoire de Society of United Professionals

À l'égard de

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

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

Audience publique de la Commission – Partie 2

28-31 mai 2018

Canada

SOCIETY of UNITED PROFESSIONALS

Submission To The

Canadian Nuclear Safety Commission

For

Bruce Power Inc., Operating License Renewal For Bruce A & B Nuclear Power Stations

April 16, 2018

Executive Summary

The Society of United Professionals ("the Society") seeks to intervene at the Canadian Nuclear Safety Commission's ("CNSC") public hearing in respect of Bruce Power's application to renew its Power Reactor Operating License - PROL 18.00/2020. The current Bruce A and B Power Reactor Operating Licence, expires on May 31, 2020.

The Society believes that Bruce Power has made adequate provision for the protection of the environment, health and safety of persons and maintenance of national security and measures required under section 24(4)(b) of the Nuclear Safety and Control Act. The Society is in a position of concurrence with the conclusions of CNSCs CMD 18–H4 dated February 12, 2018 namely to:

(1) Renew its Power Reactor Operating License (PROL) for Bruce A and B for a period of 10 years;

(2) Consolidate its three licences (consolidated use of nuclear substances, for laboratories and radiation devices, industrial radiography, for non-destructive testing and irradiator facility, for instrument calibration) into the PROL and;

(3) Operate Bruce A and B up to 300,000 Effective Full Power Hours.

Introduction

The Society of United Professionals (formerly known as The Society of Energy Professionals) represents more than 8,300 employees working for 14 employers in the energy and legal industry in Ontario. Some of our employers include AMEC-Nuclear Safety Solutions, Brookfield, Bruce Power, Electrical Safety Authority, Hydro One, Independent Electricity System Operator, Inergi, Kinectrics, New Horizon System Solutions, Nuclear Waste Management Organization, Ontario Power Generation, Ontario Energy Board, Toronto Hydro and Legal Aid Ontario. Approximately 4,400 Society members are employed in our nuclear divisions with Bruce Power having approximately 1,200 members.

Our members are employed as first-line managers and supervisors, Control Room Shift Supervisors, Simulator Trainer / Examiners, professional engineers, scientists, information systems professionals, economists, auditors and accountants, lawyers as well as many other professional, administrative, and associated occupations. We are problem solvers, experts, and innovators. Our principles are the beliefs that guide our decisions and are the backbone of all of our actions and communications. As a union, we stand behind our members' professionalism, integrity, and commitment to excellence in all areas, particularly workplace safety, public health and environmental sustainability.

Our members bring a strong independent voice that is part of the broader labour movement and civil society, where we leverage our expertise and resources to create meaningful change in our workplaces and our communities.

Our independence is bolstered by membership in Canadian Labour Congress, Ontario Federation of Labour, and various labour councils, the Canadian Nuclear Workers Council, and the International Federation of Professional and Technical Engineers. Just as importantly, our leadership have forged regular, direct communication with CNSC Staff at each Nuclear Facility

At Bruce Power our members provide technical expertise in areas of conventional health and safety, radiation safety, emergency preparedness and environmental protection. Society represented safety sensitive occupations include ergonomists, safety specialists, industrial hygienists, safety officers, health physicists, emergency managers, environmental scientists and environmental engineers.

Approximately 90% of our membership hold post-secondary degrees and diplomas, with 70% of our members having degrees at the Bachelor's, Master's or Ph.D. levels. Society members are knowledge workers who take great pride in exercising their civic, social and professional

responsibilities. Recently, our expertise was acknowledged in the Ontario's 2017 Long Term Energy Plan wherein it was stated by the government of Ontario:

> *For more than four decades, Ontario's electricity sector labour unions have been key partners in Ontario's nuclear industry. Today, Power Workers' Union and Society of Energy Professionals [as we were known then] together represent more than 23,000 employees in Ontario's electricity system, including our nuclear plants and supply chain companies. OPG and Bruce Power will continue to rely on their skills and expertise to refurbish our nuclear fleet and ensure safe operation for decades to come.*

In accordance with section 19 of the CNSCs Rules of Procedure the Society appreciates the opportunity to comment on Bruce Power's application to renew its Power Reactor Operating License. This is apropos as the Society has intervened in each and every CNSC license hearing at Bruce Power, Darlington Nuclear and Pickering Nuclear. We have also been intervenors for the proposed Deep Geological Repository by Ontario Power Generation and comment on proposed CNSC regulations as required. In short we feel compelled to intervene as we regard ourselves as a holder of the public trust and as significant stakeholders in Ontario's nuclear stations.

It is in this spirit that the Society wishes to comment in the areas of: Nuclear Safety, Labour Relations, Emergency Preparedness, Conventional and Radiological Safety, Environmental Protection, Employee Involvement and Engagement and Diversity and Inclusion as we support Bruce Power's request and the CNSCs staff recommendation to: (1) renew its Power Reactor Operating License (PROL) for Bruce A and B for a period of 10 years: (2) consolidate its three licences (consolidated use of nuclear substances, for laboratories and radiation devices, industrial radiography, for non-destructive testing and irradiator facility, for instrument calibration) into the PROL; and (3) Operate Bruce A and B up to 300,000 Effective Full Power Hours.

Nuclear Safety

We have conducted internal inquiries with many of the members who have worked on key elements of the Periodic Safety Review (PSR) and the Probabilistic Safety Assessment (PSA) and members stand behind the accuracy and integrity of the review and assessments.

The PSR is an assessment of the current state of a nuclear plant compared with 64 modern codes and standards. Arising from the assessment are reasonable and practicable safety enhancements which will enable the plant to operate safely over the next licensing period (per REGDOC-2.3.3). We are confident in the rigour with which the PSR has been done over the three year period as a great many of our members have contributed to the work done on the Safety Analysis and the arising safety improvements. There were approximately 191 safety improvements documented in the Integrated Implementation Plan (IIP) which will be executed at Bruce A and Bruce B with defined completion dates. Also, our members have expressed satisfaction in the rigour with which Bruce Power's conducted its PSA. This tool demonstrates that a safe design basis is maintained at all times notwithstanding the impact of internal and external events on its

operation. The PSA is of vital importance as it is a risk-informed verification tool used during plant maintenance and outage work which ensures the safety of our employees while at work.

Furthermore, the Society accepts CNSCs staff recommendation to operate fuel channels up to a maximum of 300,000 Effective Full Power Hours. This is premised on Bruce Power having adequate Life Cycle Management Plans (to manage aging components), inspection results, Control Room policies and procedures to monitor leaks from pressure tubes, industry operating experience that demonstrate fitness for service of Fuel Channels, the development fracture toughness models sufficient for safe operation of pressure tubes, and the imposition of regulatory hold points by the CNSC.

We have confidence in the evidence presented by the licensee and are further assured that CNSC staff will report on the status of all commitments made to the Commission through Regulatory Oversight Report for Nuclear Power Plants.

Labour Relations

Finding the right balance between hiring permanent staff and contractors continues to be a source of tension between the Society and Bruce Power. If the optimum balance is not found our members run the risk of having their nuclear expertise and the workplace nuclear safety culture eroded. In light of the proposed Major Component Replacement (MCR) project the number of contractors and augmented staff being assigned to core engineering tasks is a topic of concern and is regularly broached with site management. The Society asserts that hiring sufficient numbers of permanent staff is critical as it ensures a consistent high standard of work being performed at the nuclear plant to maintain station system health, the station's design basis and fostering a strong nuclear safety culture. Permanent employees hired by Bruce Power are ostensibly committed to long term success of the Bruce Power site as their livelihood and professional reputation is directly linked to the on-going future of Bruce Power's operations.

Equally as important is the issue of retaining institutional knowledge attached to the performance of various roles in a manner which fosters a healthy safety culture. This manifests itself by promoting a commitment to safety, continuous learning that is responsive to risk and the complexity of our industry and strict adherence to governance that defines and manages safety goals and performance objectives. In this regard, the Society will continue its collaboration with Bruce Power to ensure knowledge transfer takes place from senior employees to junior employees. Retiring workers hold a vast repository of information garnered from years of working at Bruce Power. Capturing important lessons learned over the past 30 years of station operation will be invaluable as Bruce Power's moves into its Asset Management activities, Life-Extension Program and Major Component Replacement Project for Units 3-8 over the next two decades.

The Society remains resolute that a sufficient number of adequately trained permanent employees in possession of the requisite knowledge and skills are necessary to operate the plant safely and reliably. The Society understands that Bruce Power is committed to increasing the numbers of certified staff which will conceivably provide flexibility to its workforce and avoid

issues related to: minimum shift complement hours-of-work contraventions, worker fatigue, worker safety and human performance events due to errors in performing work. Accordingly, the Society is committed to working with the management of Bruce Power to formulating effective staffing plans as we are concerned about the hours-of-work non-compliances throughout the current licence period.

Lastly, while the Society agrees that there are merits to issuing a 10 year license including: an acceptable period of time between PSRs, regulatory certainty, worker attraction, worker retention, stability of community we believe that it is in the public's interest for the Society to meet with the CNSC's Director of the Bruce Regulatory Program Division (a position currently held by Mr. Luc Sigouin) on a quarterly basis to discuss emergent issues related to the safe and reliable operation of the station.

Emergency Preparedness

In October 2016, Bruce Power conducted a full scale severe accident exercise which simulated a major nuclear incident at Bruce Power. The goal of the exercise was to demonstrate Bruce Power's capability to deal with severe accidents effectively and was dubbed *"Huron Resolve".* This endeavour brought together almost 500 people from more than 30 organizations, including all levels of government, Bruce Power, and Non-Governmental Organizations. Our members who were involved in the exercise inform that as a result of the exercise, they are confident that agencies who participated can better collaborate and communicate. Moreover, the lessons learned will assist Bruce Power with its mandate of continuously improving its emergency preparedness programs and procedures.

Since the inception of the emergency preparedness program at Bruce Power, our members have been involved and witnessed the significant evolution made by the employer in educating and coordinating emergency preparedness in the community. As a result, public confidence remains strong with Bruce Power's operational, reputational and community involvement. One of our members stated:

> *I am now in my 30th year at the Bruce Power Site having spent the first 13 years in maintenance, primarily at Bruce A and the remaining 17 years with Emergency Protective Services (EPS) in the fire protection organization and 15 of those years as a SERM (Shift Emergency Response Manager) in a Society represented position. I built a new home 22 years ago on 50 acres located within 4 kilometers of the Site's main gate and currently have a public alert radio and KI pills stationed in my home. I am also a volunteer fire fighter in the local municipality with 23 years of service and 29 years as a member of a local Lions International club providing needed community service. I serve as a "Fire Advisor" in the company's EMC (Emergency Management Centre) and have had varying degrees of involvement in emergency mitigation plans and programs including the two large scale exercises; "Huron Challenge" and "Huron Resolve". I am more than satisfied with programs and efforts to implement such, within the community as a resident, a local responder, a community volunteer and as member of the company's response organization. Lessons learned from the large corporate exercises have been*

incorporated into the planning of the third initiative to be implemented in the fall of this year.

Arising from the Fukushima Accident in 2011, Bruce Power has enhanced its emergency preparedness program by putting in place Emergency Mitigating Equipment, Plume Dispersion Modeling for multi-unit failure and implemented an Emergency Data Transmission system (where data is stored off-site). These measures give our members, their families and neighbours in the adjoining three counties the confidence that Bruce Power will be able to respond effectively to accidents and emergency situations.

Furthermore, our members advise that in the unlikely case of an emergency they and their families know what actions to take as Bruce Power (in cooperation with a number of municipal, provincial and federal partners) have launched an educational emergency website: www.bepreparedgreybrucehuron.com aimed at informing residents on what to do in different types of emergencies – nuclear, fire, flood, winter storm, tornado, and power outages. It provides information on building a survival kit, KI pill distribution (households and businesses within the 10 km radius have been supplied and pick up locations established within the 50 km secondary zone) and sheltering instructions. The Society is pleased to see that school boards have also been supplied with KI pills along with applicable literature on the subject. Added to the public alerts provided to residents within 10 km of the nuclear station, on April 6, 2018 members of the community now enjoy the benefit of being alerted to a public emergency on their cellular devices similar to those received on televisions or radios. For these reasons, the Society has added comfort that the safety of our members, their families and neighbours is being taken seriously.

Bruce A and B met applicable CNSC requirements and performance objectives, and each station received a "satisfactory" rating during all years of the licence period for emergency preparedness.

Conventional Safety and Radiological Safety

Our members and our union are uniquely embedded in the workplace and act as an additional safeguard of the public trust at Bruce Power and indeed, in all of Ontario's nuclear operations. Consequently there is no one who can claim to have a higher stake in the safe and environmentally responsible construction and operation of our nuclear stations than our members and their families. Research shows that nuclear, conventional and radiological goals are enhanced by the presence of unions in the workplace. Our members have more safety training, are able to foresee and proactively manage workplace hazards, are more forthcoming in reporting low level safety incidents thereby precluding more serious injuries and have fewer injuries requiring less time away from work.

Our members have not only chosen to work at Bruce Power but live in Bruce County with their families who drink the same water and breathe the same air as all local residents. Therefore, the

workplace is an extension of their lives and they are among the first in harm's way, which means our members maintain the highest standards of safe operation, occupational health and safety.

Our occupational positions, training and experience, and our independent role on the tripartite committees have enabled us to insist without compromise on adherence to the most stringent of standards – legislative and otherwise. Our independence allows us to disagree with proposed solutions if we do not feel comfortable with them or they are not in keeping with independent research done by our representatives or experts at the Society. The Society nominees to joint teams can only be appointed by authorized Society representatives which maintains our independence. Appointments are made by either the Local Vice-President, or the Society Local Executive Committee. Our fierce and independent voice in all pillars of health and safety is manifested by our involvement on the Joint Policy Committee on Health and Safety (JPC), Worker Protection Improvement Committee (WPIC), Worker Protection Oversight Committee, (WPOC), Joint Working Committee on Health and Safety (JWC), Joint Health and Safety Committees (JHSCs) and *Joint* Committee on Radiation Protection (JCRP). A description and efficacy of these committees are outlined below:

Joint Policy Committee (JPC) on Health and Safety: This committee is at the top of the internal responsibility system at Bruce Power and meets quarterly. The decision makers on JPC are the Bruce Power CEO and President Mike Rencheck, Society of United Professionals President Scott Travers, and Power Workers Union President Mel Hyatt. JPC provides oversight over all safety committees at Bruce Power and any issues that cannot be resolved at lower level committees can be escalated to the JPC for resolution. As an illustration of the efficacy of this Committee, in the last year an issue regarding circuit breaker health and refurbishment was escalated to JPC after the lower level Joint Health and Safety Committee and Joint Working Committee were unable to resolve the issue. Since referral to the JPC that issue has been prioritized with increased resources and is on track for resolution in a timely and planned manner.

Worker Protection: The Society has involvement with worker protection on several levels. There is a tripartite worker protection improvement committee (WPIC) and also a separate tri-partite work protection oversight committee (WPOC) that has approval authority for any worker protection program changes. Worker protection is a complex and important safety program. The current system requires workers of diverse work backgrounds such as operations, maintenance and management to prepare, review and agree to any changes, giving a robust defense-in-depth approach to changes and improvements to the evolution of the worker protection program.

Joint Working Committee on Health and Safety (JWC): This tripartite committee has decision making members from the Society of United Professionals (Local Vice President), Power Workers Union (Sector Representative) and Management (Department Manager Safety). This diverse background of decision makers has a broad range of experience both as workers and managers and this diversity means that the committee can consider safety issues from many perspectives. The JWC provides oversight over the six individual JHSCs at Bruce Power. A healthy safety culture requires constant and

persistent drive to improve health and safety. Having worker involvement on safety committees at all levels of Bruce Power allows the workers to help drive improvement in health and safety. To put it simply, when it comes to health and safety "great" is never good enough and worker involvement in driving safety improvements and resolving safety issues consistently leads to a better safety culture and safer workplaces.

Joint Health and Safety Committee (JHSC): A JHSC is required to be established under Section 9 of the Occupational Health and Safety Act (OSHA) for workplaces with 20 or more workers. Members are trained and certified in accordance with legal and workplace requirements. Members on JHSC know that they can bring forward safety issues and ideas for safety improvements to the management of Bruce Power or support issues brought forward by the PWU with absolutely no fear of retribution and/or retaliation. Our role also encompasses investigations into workplace incidents and accidents where the root cause of such events are conducted. If need be, unsafe work can be halted by any JHSC member. It is the experience of our members who sit on these Committees, that Bruce Power values the contributions made by Worker Members with regard to workplace inspections and suggested safety improvements. In this regard, the Society looks forward to ongoing collaboration for the term of this proposed license and beyond.

Joint Committee on Radiation Protection (JCRP): Society members on this Committee draw on their many years of rich experience as well as their radiation protection qualifications and can opine on the efficacy of the JCRP. From a safety perspective, our members confirm that there is an aggressive target for procedural revisions to accommodate the Major Component Replacement project currently being practiced. As procedure revisions are completed, they have had an opportunity to review, question and make recommendations on the affected procedures. On a quarterly basis, the JCRP receives updates on new initiatives across site, which includes: outage updates from both stations and site services in regard to dosimetry and dose, process innovations and equipment upgrades. Our members have personally signed off as an impacted party reviewer on the revised radiation procedures and have been provided ample opportunity to comment on and to question radiation protection practices. The quarterly meetings allow for routine opportunity to monitor and participate in radiation safety improvements from a Society perspective, helping to ensure that commitments are met in a timely fashion. Our members are confident that current practices contribute towards Bruce Power's continued safe operation from a radiological perspective. Initiatives such as the "VAST program" which monitors the stations' online automated radiation background monitoring which identifies safe travel routes within the powerhouse. This initiative is demonstrative of the company's commitments in working collaboratively with the union to affect improvements in radiation safety for all workers.

The Conventional Health and Safety and Control ratings at Bruce A and B met applicable CNSC requirements and performance objectives. Bruce Power received a "fully satisfactory" rating for Bruce A and B since 2009. However, in 2016, the Bruce B rating was downgraded to a "satisfactory" rating. Although it was disappointing to see that there was a downgrade for Bruce

B during the last licensing period, the accident frequency at Bruce Power remain low compared to Canadian industry and comparable to Canadian nuclear industry average. Bruce Power also launched the *"You Can Count on Me"* campaign which makes use of improved hazard identification tools, enhanced tracking, and additional training related to leadership, observation, and coaching to further improve its rating. On this note, we are confident that the efforts of our Society members, along with members of the Power Workers Union and the management of Bruce Power will continue to ensure that important metrics meet or exceed the minimum limit mandated by the CNSC.

Over the current licensing period no worker or member of the public received radiological doses in excess of the regulatory limits and all radiological releases were below regulatory limits. Bruce A and Bruce B improved to a "fully satisfactory" rating in 2016.atisfactory for radiation protection.

Environmental Protection

The Society is pleased that since 2015 Bruce Power's environmental performance has continuously improved in part due to its adherence to ISO 14001 Environmental Management System program. Bruce A and Bruce B received ratings of "Satisfactory" during all years of the licensing period. Our employees attest to the robust conventional and radiological effluent monitoring program which Bruce Power designed in order to meet regulatory requirements as prescribed under its PROL issued by the CNSC, Ontario Regulation 215/95 (Effluent Monitoring and Effluent Limits - Electric Power Generation Sector) and associated environmental compliance approvals.

We are satisfied that Bruce Power executes a comprehensive Environmental Monitoring Program which includes biological surveys ensuring sensitive ecological components are considered and that there is no adverse environmental impacts associated with site operations. All plausible environmental impacts are documented in an Environmental Risk Assessment which gets submitted and approved in association with the PROL issued by the CNSC. Most importantly, all site operations are conducted under the Bruce Power's Environmental Policy which is reviewed annually and signed by the CEO. Accordingly, Society employees regularly assist in generating reports as part of the Environmental Monitoring Program. Data is generated from sampling which is performed on area water, precipitation, aquatic samples (including fish, sediment and sand), terrestrial samples (including animal products, vegetation and soils), external gamma radiation in air, and tritium and Carbon-14 in air, both from on-and off-site locations.

The Society was pleased to learn that the Environmental Risk Assessment and the Predictive Risk Assessment (arising from the MCR) concluded that the potential risks from physical stressors and radiological and non-radiological releases to the atmospheric, terrestrial, hydrogeological, aquatic and human environment are low to negligible. Lastly, and perhaps most importantly, electricity generation by the Bruce Power avoids large greenhouse gas emissions

that would otherwise be necessary. In 2016 Ontario produced more than 60 per cent of its electricity from nuclear power of which Bruce Power was a major player. The 2017 Ontario's Long Term Energy Plan stated:

> *The most cost-effective option for producing the baseload generation the province needs while releasing no GHG emissions is to refurbish Ontario's nuclear generating stations. Ontario is moving forward with the plans laid out in the 2013 LTEP to refurbish a total of ten nuclear units between 2016 and 2033 – four units at Darlington and six units at Bruce.*

Many of our members not only work but live in the immediate surroundings of the nuclear station and as a result, have a vested interest in protecting their families and environment from any ill effects arising from operation of the plant. These members also boat, surf, fish and spend time on the many local beaches with their families, all of which are activities enshrined into their lifestyle. With this vested interest in mind, our members will be quick to identify concerns 'outside of the gate' and will have little hesitation in bringing this to the attention of the leadership at Bruce Power. When necessary, full assistance is rendered by our members during compliance inspections / investigations carried out by the CNSC and various regulators. Should our members witness and need to disclose less than optimum protection of the environment they can do so with little difficulty to the responsible regulator should other mechanisms fail to resolve the issue.

Employee Involvement and Engagement

There has been a palpable improvement in plant performance during the last licensing period in part due to the contribution, commitment and engagement of our members to all facets of plant operation. Our Operations Front Line Managers (FLMs) are focused on human performance improvements such adhering to internal process and procedures and following World Association of Nuclear Operator process models which are benchmarked against industry best practices. Maintenance FLMs are Society members who focus on improvements in equipment overhaul and repairs. Our Operations and Maintenance Engineers work assiduously to increase the quality of parts, play a vital role in resolving equipment issues in a timely manner and forensically examine failed equipment in an effort to find the root cause of events.

During the execution of their duties, if one of our members is dissatisfied with the technical analysis being performed a procedure called *'Resolution of differing Professional Opinions'* exist to resolve technical differing opinions. Essentially, a member who has a concern with a technical nuclear safety and / or regulatory compliance issue can identify that concern to their supervisor and if discussions are not able to resolve the issue a Station Condition Record (SCR) can be filed. The SCR process allows for the adverse condition to be adequately documented, its cause determined, corrective action to be implemented, and is a tool which prevents the recurrence or reduce the risk of recurrence of a similar adverse condition. By doing so, lessons learned can be incorporated into best practices which drives improvements and ensures the ongoing safety of the workers, plant equipment, the public and the environment under normal and accident conditions.

Due in part to the contribution of our members the CNSC found that Operating Performance of Bruce A and B exceeded regulatory requirements and expectations. Furthermore, Bruce Power met applicable CNSC requirements and performance objectives, and each station received a "fully satisfactory" rating during all years of the licence period except for Bruce A in 2014 which received a "satisfactory" rating.

Diversity and Inclusion

As a union we pride ourselves on having a diverse membership where individuals can leverage all facets of their uniqueness when they report to work. We are of the belief that diversity in the workforce is a strength that unlocks innovation by creating an environment where individuals are encouraged to table novel ideas and ultimately contributes to a healthy, robust nuclear safety culture.

The value placed on Diversity is borne out under Article 3.3.6 of The Society's Constitution and By-Laws and The Society's Diversity Policy (Policy Number: Int-Equity-2016-Nov-14-SC-R02-Diversity). As stated in the policy: The Society [acts] as an advocate and representative on behalf of its members and an active participant in the broader struggle on behalf of all people for dignity, respect and a just and inclusive society. We insist that this value be enshrined into business practices of our employers as we regard these as fundamental facets of leadership competency.

At Bruce Power our members sit on the Equity and Diversity tripartite committee which is comprised of Society, PWU and Bruce Power's Management staff members. Each group that has membership on this committee is equally represented and each has an independent voice. The Committee collaboratively make recommendations, and supports Bruce Power in achieving the goals defined in its Employment Equity Action Plan and promotes employment equity across the organization. Through this medium, our members:

- Consult with management on key diversity and inclusion initiatives, promotes awareness of existing legislation, policies and procedures;
- Import knowledge of best practices in labour movement, implementing and / or supporting initiatives / messages related to diversity, equity and inclusion;
- Provide a forum for discussion / advice on diversity issues / concerns brought forth to the committee;
- Develop and recommend initiatives that support diversity, equity and inclusion;
- Communicate information related to diversity, equity and inclusion throughout the workplace; and
- Report to our union leadership tensions related to issues which arise in the diversity, equity and inclusion forum.

Our members work diligently to remove barriers for those who have faced systemic discrimination namely: women, indigenous peoples, persons with disabilities and visible

minorities. We do this by focusing on education, recruitment, training and effective communications. The Society is pleased to see that in 2016 Bruce Power met its hiring targets for indigenous peoples. In the last 3 years our members took note of the fact that the licensee has created 66 additional positions for indigenous people. However, we hasten to add that more work needs to be done in meeting targets in other areas. We impress on Bruce Power the importance of increasing the percentage of candidates in the four designated groups. We will continue our collaboration with Bruce Power to create additional programs which foster and embrace a more inclusive workplace where all of our members are empowered to succeed.

Moreover, the Society believes that plant performance has been enhanced by the diversity gains in the workforce realized during the last licensing period.

Conclusion

The Society is proud of the contribution which our members have made over the past 40 plus years at the Bruce Site. Going forward, we are committed to working with Bruce Power, the CNSC and all stakeholders in securing the safe and reliable running of the nuclear station. Our members not only generate power but see themselves as building infrastructure for generations to come. We take this commitment personally and work conscientiously each and every day to maintain the trust which the people in our surrounding communities have given us. To do anything less is in contravention of our social mandate and a violation of our core principles.

Principles to maintain the highest standards with respect to Nuclear Safety, Conventional Safety, Radiation Safety, Environmental Protection, Worker Protection, and Emergency Preparedness are of utmost importance to the Society and our members. These principles manifest regularly in workplace discussions, decisions and actions to drive a safety culture of continuous improvement.

In this spirit:

The Society believes that Bruce Power has made adequate provision for the protection of the environment, health and safety of persons and maintenance of national security and measures required under section 24(4)(b) of the Nuclear Safety and Control Act.

Therefore, the Society supports Bruce Powers request to:

1. Renew its Power Reactor Operating License (PROL) for Bruce A and B for a period of 10 years;

2. Consolidate its three licences (consolidated use of nuclear substances, for laboratories and radiation devices, industrial radiography, for non-destructive testing and irradiator facility, for instrument calibration) into the PROL and;

3. Operate Bruce A and B up to 300,000 Effective Full Power Hours.

The Society of United Professionals would like to thank the CNSC for the opportunity to submit this written intervention in support of Bruce Power's application to renew its Power Reactor

Operating License and advises that we will also be making an oral presentation at the Part 2 hearings in May 2018.

All of which is respectfully submitted.

Scott Travers
President

We are profiled on:

Facebook: https://www.facebook.com/thesocietysays/
Twitter: www.twitter.com/TheSocietySays
Website: www.thesociety.ca