



Date: 2019-10-07
File / dossier : 6.02.04
Edocs pdf : 6014569

**Written submission from the
Power Workers' Union**

**Mémoire du Syndicat des
travailleurs et travailleuses du
secteur énergétique**

**Regulatory Oversight Report for
Canadian Nuclear Power
Generating Sites: 2018**

**Rapport de surveillance
réglementaire des sites de centrales
nucléaires au Canada : 2018**

Commission Meeting

Réunion de la Commission

November 6, 2019

Le 6 novembre 2019

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October 07, 2019

Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Ms. Levert:

Submission to the Canadian Nuclear Safety Commission (CNSC)

**RE: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites:
2018 (CMD: 19-M30)**

The Power Workers' Union (PWU) represents Workers at the Ontario Power Generation (OPG) Pickering, OPG Darlington, Bruce Power A and Bruce Power B Nuclear Power Plants (NPPs) as well as the Darlington, Pickering and Western Waste Management Facilities (WMFs). PWU Members work in all disciplines throughout these facilities up to and including first line supervision.

The PWU fully supports the findings of CNSC Staff in their 2018 Regulatory Oversight Report for Canadian Nuclear Power Generating Sites and their conclusion that Canada's NPPs and adjacent WMFs operated safely in 2018.

The PWU has been an intervenor in a number of CNSC license hearings and Public Meetings including the PROL Hearings for Bruce Power and OPG-Pickering in 2018 and the Public Meeting on the ROR for Canadian Nuclear Generating Sites: 2017. As stated in previous submissions, the PWU takes its leadership role in Health and Safety very seriously. This includes safety culture, radiological safety, conventional safety, environmental safety, public safety, nuclear safety and security. We take a collaborative approach to health and safety and participate in a number of joint forums to help facilitate this such as: Joint Health and Safety Committees (JHSCs), Joint Health and Safety Working Committees, Joint Policy Committees, Joint Committees on Radiation Protection and ALARA Committees. We have negotiated the unilateral right of certified JHSC Members to shutdown unsafe work, additional training for JHSC Members and Union involvement in incident investigations. We encourage our Members to use the internal responsibility system to jointly address health and safety concerns. We promote the reporting of all potential issues, joint investigations and learning from experience across the industry. Additionally, the PWU provides internal, Union-led training for JHSC

Members and Chief Stewards on a variety of health and safety topics. The NPPs and WMFs we work in continue to experience great Health and Safety records but we continuously strive for improvement. We work closely with our employers to ensure these plants continue to operate safely.

We note that all NPPs and adjacent WMFs operated safely during 2018 and continued to receive a rating of Satisfactory or better in all Safety and Control Areas (SCA).

We would like to thank the CNSC Staff for their continuing oversight of Canada's NPPs and WMFs and for another very thorough report. This oversight is beneficial for the people who work in Canada's Nuclear Industry and for the Public. We commend the CNSC for producing this annual report. This report and the opportunity for public comment help ensure Canada's Nuclear Power Plants continue to operate safely. With longer license periods the annual ROR and public meeting become even more important for public engagement.

Thank you for the opportunity to comment. If you require additional information from the PWU please contact us.

Respectfully submitted by,

Power Workers' Union
244 Eglinton Ave E.
Toronto, Ontario
M4P 1K2