



Oral Presentation

Written submission from the Canadian Nuclear Workers' Council

In the Matter of the

**Canadian Nuclear Laboratories,
Douglas Point Waste Facility**

Application to amend the waste facility decommissioning licence for the Douglas Point Waste Facility

Commission Public Hearing

November 25-26, 2020

Exposé oral

Mémoire du Conseil canadien des travailleurs du nucléaire

À l'égard de

**Les Laboratoires Nucléaires Canadiens,
installation de gestion des déchets de
Douglas Point**

Demande de modification du permis de déclassement de l'installation de gestion des déchets de Douglas Point

Audience publique de la Commission

25 et 26 novembre 2020

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Canadian Nuclear Workers' Council

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October 26, 2020

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

Members of the Canadian Nuclear Safety Commission

RE: CNSC Hearing to consider an application from CNL to amend its waste facility decommissioning licence for the Douglas Point Waste Facility Ref. 2020-H-4.1

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to the application from Canadian Nuclear Laboratories Limited (CNL) to amend its waste facility decommissioning licence (WFDL) for the Douglas Point Waste Facility (DPWF), WFDL-W4-332.02/2034. Please accept this letter as our written submission. We would also like to make an oral submission at the Public Hearing on November 25 and 26, 2020.

The CNWC supports advancing the decommissioning of the DPWF to phase 3.

Who We Are

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry for 27 years. This includes uranium mining, nuclear fuel processing, Nuclear Power Plant (NPP) operation and maintenance, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning. A number of our CNWC Member Unions represent Workers at the Bruce Site, where Douglas Point is located, and at Chalk River, where the low and intermediate level waste will be safely stored.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard by decision makers,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's Nuclear Industries, and
- enhance public knowledge about the many benefits of Canada's Nuclear Industry.

For all CNWC Member Unions the Health and Safety of our Members is paramount. We work collaboratively with our employers to ensure this is always in mind. When our workplaces are safe it's better for the environment and it's better for our communities. Workplace Health and Safety, Public Safety and the Protection of our Environment are all intricately linked. You cannot adequately

The Canadian Nuclear Workers' Council is comprised of Locals of the following organizations: District Labour Councils (Grey/Bruce, Durham, Northumberland, Lindsay and Saint John) * International Association of Firefighters * International Association of Machinists & Aerospace Workers * International Brotherhood of Electrical Workers * United Steel Workers * Power Workers' Union * Professional Institute of the Public Service of Canada * Public Service Alliance of Canada * Provincial Building and Construction Trades Council of Ontario (Ont. Building Trades) * Society of United Professionals * Society of Professional Engineers and Associates * UNIFOR * International Federation of Professional & Technical Engineers

address one without the others. We live, work and play in our nuclear host communities along with our friends and families. We take our responsibilities seriously. Nothing is more important.

The CNWC Board of Directors meet regularly and representatives from our Member Unions get together annually for conferences at a different locations across our industry. We use these opportunities to learn more about Canada's Nuclear Industry, hear more about current issues, network and learn from our experiences.

The CNWC is a regular intervenor at CNSC Licence hearings and CNSC Regulatory Oversight Reports and regularly comments on the evolution of CNSC Regulatory Documents.

More information about the CNWC can be found on our website www.cnwc-cctn.ca.

Douglas Point Waste Facility and CNL

We reviewed CNL's application to amend the decommissioning licence for the DPWF, CMD: 20-H4.1 and CMD: 20-H4.1A. We also participated in discussions with CNL and Member Unions.

The Douglas Point Nuclear Generating Station was a 200 MWe CANDU PHW Reactor owned by Atomic Energy of Canada Limited (AECL) and operated by Ontario Hydro. It was in service from 1968 to 1984. In 1984 Douglas Point went into a safe sustainable shut down phase and the reactor was defueled and dewatered. Since 1987 the facility has been in phase 2, storage with surveillance. This proposed licence amendment would allow the Douglas Point Waste Facility to proceed to phase 3, final decommissioning. Decommissioning activities will take place in a number of sub groups (planning envelopes). A detailed decommissioning plan for each group of activities will be approved by CNSC Staff before work commences and CNSC Staff will provide ongoing oversight. Phase 3 is expected to continue for up to 50 years and community consultations will continue as the project progresses.

The DPWF is located on the site of the Bruce Nuclear Generating Station. Ontario Hydro's successor company, Ontario Power Generation (OPG), owns the site. Bruce Power leases the site and the Bruce Nuclear Generating Station from OPG. The Douglas Point structure and equipment remain owned by AECL. CNL is responsible for the management of AECL assets, including the decommissioning of the DPWF, under a government-owned, contractor-operated (GOCO) model. CNL will ensure the DPWF remains in a safe and secure state until the facility is fully decommissioned. CNL plans to transport the DPWF's low and intermediate level waste to CNL's Chalk River site. Used fuel will eventually be transferred to the Nuclear Waste Management Organization's used fuel repository.

CNSC Staff Assessment

We reviewed CNSC Staff's assessment of the proposed licence amendment, CMD: 20-H4. We also participated in a web based CNSC information session. We are in support of CNSC Staff's assessment but feel it is necessary to identify some hesitation in giving that support.

We agree with CNSC Staff's conclusion that CNL is qualified to carry out the activities authorized under the licence. We also agree that CNL has made adequate provisions for the protection of the

environment and the health and safety of persons. We agree that the proposed licence amendment is not likely to cause significant adverse environmental effects. CNL has demonstrated, through past performance, their ability to satisfactorily manage all relevant safety and control areas (SCAs).

Our hesitation arises because we know the decommissioning work will be contracted out by CNL but we don't know who the contractor will be or where they will get the skilled workers they will require to do this work. This is an unusual situation and only potentially arises because of the unique ownership/management situation at the DPWF. We know CNWC Member Unions work collaboratively with the contractors they have a relationship with. The Members of those Unions will have all the skills required to do this work, they will know nuclear safety culture and they will feel comfortable raising concerns. Currently we don't know who will be doing this work so we cannot give those assurances.

Concluding Remarks

The Nuclear Industry is an important segment of Canada's economy and a vital part of our clean energy mix. Douglas Point led the way in the development of full scale CANDU projects, now it will help us learn in preparation for future NPP decommissioning projects. Nuclear power provides clean, reliable, affordable baseload generation in Ontario and New Brunswick helping to lead the fight against climate change. It produces nuclear isotopes vital for our healthcare. The Industry is highly unionized and supports high quality employment for tens of thousands of Canadians. This project and future decommissioning projects will provide even more jobs. The workplace health and safety standards in Canada's Nuclear Industry are second to none. Employers and Unions in the Industry work together and they all learn from one another.

The CNWC supports CNL's application to amend the licence for the DPWF to progress decommissioning to phase 3 but we encourage continuing dialogue with our Member Unions to ensure there are skilled, Unionized Workers employed on this project and lessons learned are captured for future decommissioning projects.

I would like to take this opportunity to thank the CNSC, CNSC Staff and all Intervenors in this public hearing. The public CNSC Licence hearings and the continuous oversight of the CNSC and CNSC Staff all serve to make our workplaces and communities safer. Thank-you.

Bob Walker
National Director
Canadian Nuclear Workers' Council