



Supplementary Information

Presentation 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

Renseignements supplémentaires

Présentation 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 déclasser de l'installation de gestion des déchets de Douglas Point

Audience publique de la Commission

25 et 26 novembre 2020

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Application from CNL to amend its waste facility
decommissioning licence for the
Douglas Point Waste Facility
Ref. 2020-H-4.1



Canadian Nuclear Safety Commission
Public Hearing

November 26, 2020

Submission from the Canadian Nuclear Workers' Council
CNWC

Bob Walker
National Director
Canadian Nuclear Workers' Council



Canadian Nuclear Workers Council



CNWC Member Unions represent Workers across Canada's Nuclear Industry:

- Uranium mines and mills,
- Nuclear fuel manufacturing,
- Nuclear Power Plant (NPP) operation and maintenance,
- NPP construction and refurbishment,
- Medical isotope production,
- Nuclear research and development,
- Nuclear waste handling, and
- Decommissioning.

Membership also includes District Labour Councils.

Canadian Nuclear Workers Council



Formed in 1993.

The goals of the CNWC are to:

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

We participate with industry and the regulator, publish a seasonal newsletter, maintain a website, have a social media presence, hold an annual conference at strategic locations, and our Board talks regularly.

Canadian Nuclear Workers Council



For the CNWC and all of our Member Unions the Health and Safety of our Members is paramount.

We believe that workplace health and safety, public safety and the protection of our environment are intricately linked.

When our workplaces are safe it's better for the environment and safe workplaces result in safer communities.

Nuclear Workers live, work and play in our nuclear host communities along with our friends and families.

We take our responsibilities seriously.

Nothing is more important.

CNL's application to amend the Douglas Point WFDL



The Douglas Point NGS was a 200 MWe CANDU PHWR.
In service from 1968 to 1984.

Owned by AECL on an OPG Site and was operated by Ontario Hydro.
In 1984 Douglas Point went into a safe, sustainable shut down phase.
Since 1987 the facility has been in phase 2, storage with surveillance.
Proposed amendment allows Douglas Point to proceed to phase 3.
Decommissioning activities will take place in a number of planning envelopes.

Detailed decommissioning plans will be approved by CNSC Staff in advance and CNSC Staff will provide ongoing oversight.

Phase 3 is expected to continue for up to 50 years.

Community consultations will continue as the project progresses.

CNWC position on the proposed licence amendment



The CNWC:

- Reviewed CNSC Staff's assessment of the proposed licence amendment, CMD: 20-H4.
- Participated in a web based information session.
- Met online with CNL.

The CNWC:

- Supports CNSC Staff's assessment.
- Agrees with CNSC Staff's conclusion that CNL is qualified to carry out the activities authorized under the licence.
- Supports CNL advancing DP into the next phase of decommissioning.

CNWC position on the proposed licence amendment



- CNL has made adequate provisions for the protection of the environment and the health and safety of persons.
- 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).

**We are not in a position to fully endorse the project as we do not know who will be doing the work.*

CNWC position on the proposed licence amendment



Decommissioning work will be contracted out by CNL.

We don't know who the contractor will be so we don't know where they will get the skilled Workers they will require to do this work.

This is an unusual situation and only arises because of the unique ownership/management model at the DPWF.

We know that CNWC Member Unions work collaboratively with their employers on H&S matters.

We know that 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.

CNWC position on the proposed licence amendment



- The Provincial Building and Construction Trades Council of Ontario and the Laborer's International Union of North America (LIUNA) support the proposed amendment. Their support is with the expectation that this project will be completed by a Union Contractor. Their Training Centres invest to ensure Members are work-ready with all the required tickets to work in a construction environment.
- The Ontario Association of Demolition Contractors (OADC), the Employer Bargaining Agent on behalf of the Designated Wrecking Industry under the Ontario Legislated ICI Sector, supports the project. OADC negotiates on behalf of member companies with LIUNA.

*Industrial, Commercial and Institutional (ICI) sector of the Ontario's Construction Industry, includes a collection of provincial agreements between employer and employee bargaining agencies.

Concluding Remarks



Canada's Nuclear Industry: an important sector of our economy.

Provides clean, reliable, affordable baseload generation in Ontario and New Brunswick. This is leading 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.

The workplace health and safety standards in Canada's Nuclear Industry are second to none. Employers and Unions in the Industry work together.

Douglas Point led the way in the development of full scale CANDU projects, now it will lead the way for future decommissioning projects.

Conclusion



The CNWC supports CNL's application to amend the licence for the DPWF to progress decommissioning to phase 3.

We encourage CNL to engage in meaningful 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.

Closing



The CNWC 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.