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**Written submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du
Conseil canadien des
travailleurs du nucléaire**

**Regulatory Oversight Report for
Canadian Nuclear Laboratories
Sites: 2019**

**Rapport de surveillance
réglementaire des sites des
Laboratoires Nucléaires
Canadiens : 2019**

Commission Meeting

Réunion de la Commission

December 10, 2020

Le 10 décembre 2020

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Canadian Nuclear Workers' Council

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November 16, 2020

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

Members of the Canadian Nuclear Safety Commission

RE: Regulatory Oversight Report for Canadian Nuclear Laboratories (CNL) Sites: 2019

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's annual Regulatory Oversight Report on Canadian Nuclear Laboratories (CNL) Sites for 2019, Reference CMD 20-M22. Please include this letter for the December 8-10, 2020 meeting of the Commission.

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry for more than 27 years. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

A number of CNWC Member Unions represent Workers at CNL Sites covered by this report, including; the United Steel Workers (USW), Chalk River Professional Employees Group (CRPEG)/Professional Institute of the Public Service of Canada (PIPSC), Power Workers' Union (PWU), Provincial Building & Construction Trades Council of Ontario, International Federation of Firefighters (IAFF), Members of the Atomic Energy Allied Council, Society of Professional Engineers and Associates (SPEA).

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 talk regularly and representatives from our Member Unions get together annually for conferences at a different locations across our industry. We use this as an opportunity to learn more about Canada's Nuclear Industry, discuss current issues and learn from our experiences. Previous conference locations have included Winnipeg/Pinawa, Pembroke/Chalk River and Port Hope, allowing us to tour a number of CNL Sites

The CNWC is a regular intervenor at CNSC public hearings and meetings. We regularly comment on CNSC Regulatory Oversight Reports and on the evolution of CNSC Regulatory Documents.

The CNWC has reviewed then 2019 Regulatory Oversight Report for Canadian Nuclear Laboratories (CNL) Sites. We fully support the findings of CNSC Staff and their conclusion that CNL Sites were operated safely in 2019. CNL made adequate provisions for the health, safety and security of workers, the public and the environment. CNSC Staff's compliance activities confirmed that environmental protection programs, radiation protection programs and conventional health and safety programs were effective at all sites. We note that the CNL received a rating of "satisfactory" in all Safety and Control Areas (SCAs) at all Sites except for a rating of "below expectations" for the Security SCA at Whiteshell Laboratories. Those conclusions were based on compliance verification activities at each site and confirmed by safety performance measures. Radiation doses were below the regulatory limits, no radiological releases to the environment exceeded regulatory limits and the frequency and severity of conventional safety incidents were low.

The Unions at CNL participate in site Joint Health & Safety Committees. There is also a CNL Corporate health & safety committee which includes Union Representatives. Safety is a high priority for these unions and this results in a very good safety culture. Unions have demonstrated they improve health and safety.

The Building Trades have many Members working for different companies on different projects at the Port Hope Area Initiative (PHAI). They continue to have concerns regarding radiation protection oversight. The Building Trades request the CNSC to consider requiring third party oversight of the radiation protection program when future projects are in the planning and implementation stages.

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

The CNWC is very supportive of the annual regulatory oversight reports. We would be pleased to participate in any future discussion on improving this process. If you have any questions for the CNWC please let us know.

Respectfully submitted,

Bob Walker
National Director
Canadian Nuclear Workers' Council