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Safety Commission

Commission canadienne
de sûreté nucléaire

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

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

**Regulatory Oversight Report for
Uranium Mines and Mills in
Canada: 2019**

**Rapport de surveillance
réglementaire pour les mines et
usines de concentration d'uranium
au Canada : 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
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Members of the Canadian Nuclear Safety Commission

RE: Regulatory Oversight Report for Operating Uranium Mines and Mills in Canada: 2019

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's annual Regulatory Oversight Report for Operating Mines and Mills in Canada for 2019, Reference CMD 20-M25. 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.

Two CNWC Member Unions represent Workers at the Uranium Mines and Mills covered by this report; the United Steel Workers (USW) and UNIFOR.

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. 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.

We take our responsibilities seriously. Nothing is more important.

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

The CNWC Board of Directors talk regularly and representatives from our Member Unions get together annually for conferences at different locations across our industry. We use our conferences as an opportunity learn more about Canada's Nuclear Industry, discuss current issues and learn from one another about our experiences. This has allowed us to tour operating facilities in Northern Saskatchewan on a couple occasions.

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

The CNWC has reviewed the 2019 Regulatory Oversight Report for Operating Uranium Mines and Mills (UMMs) in Canada. We fully support the findings of CNSC Staff and their conclusion that that the Cigar Lake, McArthur River, Rabbit Lake, Key Lake, and McClean Lake facilities all operated safely in 2019. CNSC staff stated that their conclusion was based on the assessment of licensee activities including site inspections, reviews of reports submitted by licensees, and event and incident reviews. We note that all 14 SCAs received a rating of "satisfactory" at all UMMS for 2019.

Cameco and Orano have both made adequate provisions for the health, safety and security of workers, the public and the environment. CNSC Staff confirmed that radiation protection programs adequately controlled radiation exposures and radiation doses were kept as low as reasonably achievable (ALARA), environmental protection programs were effective in protecting the public and the environment, and conventional health and safety programs continued to protect workers.

The USW and UNIFOR take the safety of their Members and the environment very seriously and they work with their employers to continuously improve safety. Workers are encouraged to report any safety issues. Both the USW and UNIFOR National Unions have safety professionals on staff which can assist local Union Representatives if required.

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