



Oral Presentation

Exposé oral

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

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

In the Matter of the

À l'égard de

**Cameco Corporation,
Cigar Lake Operation**

**Cameco Corporation,
établissement de Cigar Lake**

Application for the renewal of Cameco's
uranium mine licence for the Cigar Lake
Operation

Demande de renouvellement du permis de mine
d'uranium de Cameco pour l'établissement de
Cigar Lake

Commission Public Hearing

Audience publique de la Commission

April 28-29, 2021

28 et 29 avril 2021

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Canadian Nuclear Workers' Council

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March 22, 2021

Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
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Members of the Canadian Nuclear Safety Commission (CNSC)

RE: Public Hearing on the renewal of the Uranium Mine Licence (UML) for Cameco Corporation's Cigar Lake Operation, UML-MINE-CIGAR.01/2021

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to the application from Cameco Corporation to renew the UML for their Cigar Lake Operation, UML-MINE-CIGAR.01/2021. Please accept this letter as our written submission. We would also like to make an oral presentation at the Public Hearing scheduled for April 28/29, 2021.

Who We Are

The Canadian Nuclear Workers' Council is comprised of Unions representing Workers across Canada's nuclear industry. Our membership encompasses uranium mines and mills, nuclear fuel production, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, medical isotope production, engineering, nuclear research and development, nuclear waste handling and decommissioning. The CNWC has served as the Collective Voice of Unions in Canada's nuclear industry since 1993.

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.

Maintaining the highest standards of health and safety is a fundamental value shared by all CNWC Member Unions. Its importance cannot be overstated. We share information with each other and work collaboratively with our employers to ensure we cultivate a strong safety culture. We also believe that workplace health and safety, public safety and the

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

protection of our environment are all intricately connected. When our workplaces are safe it's better for the environment and it's better for our communities. We live, work and play in our nuclear host communities along with our friends and families. We take this responsibility seriously. Nothing is more important.

The CNWC Board of Directors meet regularly and Representatives from our Member Unions get together at conferences located close to our various industry partners. We use these opportunities to learn more about Canada's Nuclear Industry, hear more about current issues, network and learn from our experiences. We've held conferences in Saskatchewan and had opportunities to tour operating uranium mines and mills in Northern Saskatchewan. We also publish a newsletter 3 or 4 times a year.

The CNWC is a regular intervenor in CNSC Licence Hearings and CNSC Annual Regulatory Oversight Reports (ROR), including the 2019 ROR for Operating Mines and Mills Ref. CMD 20-M25, and regularly comment on the evolution of CNSC Regulatory Documents.

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

Operating Uranium Mine and Mill Facilities in Northern Saskatchewan

Uranium mines and mills (UMM) in Northern Saskatchewan are operated by either Cameco Corporation or Orano Canada Inc.

Cameco Corporation operates a uranium mine at their Cigar Lake Operation, a mine at their McArthur River Operation, a mine and mill at their Rabbit Lake Operation and a mill at their Key Lake Operation. McArthur River, Rabbit Lake and Key Lake have all been under care and maintenance for reasons related to the market for uranium. Cigar Lake has also had temporary production suspensions but this has been for health and safety reasons related to COVID-19. Employees of Cameco at McArthur River and Key Lake as well as employees of Athabasca Catering Limited Partnership (ACLP) at Key Lake, McArthur River and Cigar Lake are Members of the United Steel Workers (USW) Local 8914. The President of USW Local 8914 is Denis O'Hara. Cameco employees at Cigar Lake are not unionized.

Orano Canada Inc. operates a uranium mine and mill at their McClean Lake Operation. Orano employees at McClean Lake are Members of Unifor Local 48-S. The President of Unifor Local 48-S is Jermaine Henry.

USW Local 8914 and Unifor Local 48-S are both Members of the CNWC.

CNSC Staff presented their *Regulatory Oversight Report for Operating Uranium Mines and Mills in Canada: 2019* at a Commission meeting on December 10, 2020. In that ROR

CNSC Staff concluded that all Canadian UMM facilities operated safely in 2019 and all 14 Safety and Control Areas (SCAs) received a rating of “satisfactory” at all UMMS for 2019.

Cameco Corporation’s Cigar Lake Operation (CLO)

The Cigar Lake uranium mining operation is a Joint Venture operated by Cameco Corporation. The Cigar Lake Operation is located approximately 660 kilometres north of Saskatoon in Northern Saskatchewan’s Athabasca Basin. The CLO consists of an underground uranium mine with surface facilities for loading ore slurry into trucks, waste management facilities, a water treatment plant, surface freeze plants, administration offices and warehouses. From Cigar Lake a high grade ore slurry is sent 70 km NE to the mill at Orano’s McClean Lake Operation for processing.

The current Licence for Cameco’s CLO, UML-MINE-CIGAR.00/2021 is valid until June 30, 2021. Cameco submitted an application to the CNSC requesting the current licence be renewed for a period of 10 years.

In preparation for this submission we reviewed:

- Cameco’s licence application,
- CNSC staff’s review and assessment of Cameco’s application Ref CMD 21-H2,
- Cameco’s written submission Ref CMD 21-H2.1,
- CNSC’s 2019 ROR for UMMs Ref CMD 20-M25 and CMD 20-M25.B,
- Cameco’s virtual Community Meeting,
- Public summary of Cameco CLO’s Safety and Health Management Program and Radiation Protection Program.

We reached out to our Member Unions in Saskatchewan to get feedback on Cameco’s CLO, especially their views on health and safety at Cameco and the economic importance of the UMMs in Northern Saskatchewan. Although Cameco employees at Cigar Lake are not unionized we reached out to representatives of USW Local 8914 which represents Workers employed by ACLP at Cigar Lake and Workers employed by Cameco at their other facilities in Northern Saskatchewan. We also reached out to Unifor Local 48-S for their views on the nuclear industry in Northern Saskatchewan. We attempted to get contact information for a Worker Rep on the OHC at Cameco’s CLO but we were not successful. Due to COVID-19, facilities in care and maintenance or temporary production suspensions, it was difficult to connect with people but we did get some feedback.

- Zoom meeting and email exchange with the President of USW Local 8914 and USW Staff.
- Email exchanges with Susan Daigneault, USW Local 8914 Executive and OHC Co-Chair at Cameco’s McArthur River Operations.
- Call with the President of Unifor Local 48-S.

The general feedback was that the UMMs in Northern Saskatchewan were operated with adequate provisions for the safety of people and the environment. Those familiar with Cameco were very confident that Cameco operated all of their facilities responsibly and were diligent with respect to protecting the health and safety of people and the environment. Everyone felt that these operations were important for the economy in Northern Saskatchewan and provided good quality jobs. This was highlighted by the fact that some facilities are in care and maintenance which has forced some Workers to seek employment further from their homes. There is movement of people between companies and between sites so Nuclear Workers outside of Cigar Lake have a sense of the working conditions there. No one raised any concerns about the operations at Cigar Lake. Representatives with USW are aware of Cameco's policies/practices and very confident that Cameco takes the protection of health, safety and the environment seriously.

Susan Daigneault is a long term Cameco employee, she is on the USW Local 8914 Executive and she is the Occupational Health Committee (OHC) Co-Chair at Cameco's McArthur River Operation. Note: The OHC is responsible for reviewing health and safety incidents, conducting safety inspections, evaluating safety programs and recommending health and safety improvements. Susan has presented to the Commission at previous licence hearings for McArthur River and Key Lake. When asked direct questions at the hearing Susan was able to answer with confidence that any issues related to Safety, Health and the Environment are taken very seriously by both Cameco management and workers. Here is a summary of comments received from Susan.

The north values the economic benefit of the UMM facilities and the employment opportunities they provide. The layoff of employees when facilities went into care and maintenance hit communities hard. When people found new work it often required further travel and less time with family. When I talk to people from my home town of Buffalo Narrows I can't say they are against the mines. They recognize the benefit to the growing town's economy. Representatives from NSEQC - Northern Saskatchewan Environmental Quality Committee have the opportunity to travel to sites to go on tours of the facilities, get the opportunity to ask questions and bring questions forward from Members of their communities. Information is then shared with the community, keeping people up to date with what is currently happening at the Mines in each respective area.

I have worked for Cameco Corporation for 20+ years and it has been my experience on the floor that Health, Safety and the Environment have always been priorities. When concerns are brought forward they are handled either directly with supervision or the OHC and management. We have many different avenues to report and discuss safety concerns. Management has been open and responsive when concerns are brought forward and open to suggestions.

Cameco just had a virtual teams meeting with the OHCs from Key Lake and McArthur River. That meeting took place due to a number of COVID questions employees had about the safe guards Cameco was implementing. The sites needed to ensure the communications on this were clear and consistent. This type of OHC meeting had not been done before and it proved to be very beneficial. It would be great to have each operating site communicate and share information with each other this way in future. We are all working at achieving the same goal, protecting Worker's Health & Safety as well as the Environment.

We are currently experiencing a new way of working at the mine with COVID. This has been a true test of how far Cameco will go to ensure everyone's safety. I work at McArthur River and have friends and past co-workers who work at the other operating sites, I can't see this being any different at Key Lake, Rabbit Lake or Cigar Lake.

The USW takes 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. The USW has safety professionals on staff which can assist local Union Representatives as required. We're not aware of any outstanding safety issues with USW Members at ACLP - Cigar Lake. Although Cameco employees at Cigar Lake are not Members of a Union the USW experience with Cameco Corporation in Northern Saskatchewan has shown them to be very responsible with respect to the health and safety of people and protection of the environment.

During the current licence period Cameco's CLO has complied with the NSCA and met all of their licence conditions. Cameco's performance in all SCAs has consistently received ratings of 'satisfactory'. Programs continue to be in place to ensure the health and safety of people and the environment. We note that Cameco is not proposing any changes to its Cigar Lake Operations in their licence application.

CNSC Staff Assessment

In their assessment 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.

We support the CNSC Staff assessment and their conclusion that Cameco Corporation is qualified to carry out the activities authorized by the uranium mine licence at Cigar Lake

and will continue to make adequate provision for the protection of the environment and the health and safety of persons.

We also support the CNSC Staff recommendation that the Commission renew the uranium mine licence for Cameco's Cigar Lake Operation for a period of 10 years and issue the proposed licence, UML-MINE-CIGAR.00/2031.

Concluding Remarks

The Nuclear Industry is an important part of Canada's economy and a vital part of our clean energy future. Cameco is an important part of that industry. The uranium from Northern Saskatchewan helps fuel the CANDU Reactors in Ontario and New Brunswick. Those reactors generate clean, reliable, affordable baseload electricity and help lead the fight against climate change. They also produce the nuclear isotopes vital for our healthcare and support high quality employment for tens of thousands of Canadians. The workplace health and safety standards across Canada's Nuclear Industry are second to none.

Cameco has made adequate provisions for the health, safety and security of workers, the public and the environment through their current licence period and we have no reason to believe that will not continue. CNSC Staff will continue to monitor Cameco's compliance and the annual Regulatory Oversight Reports will provide regular reporting to the Commission and the public.

We recommend that Cameco explore the suggestion of periodically scheduling virtual meetings amongst all of the OHCs from each of the operating UMM sites to share their experiences. This could also be shared with Orano.

The CNWC supports Cameco's application for a 10 year licence renewal for their Cigar Lake Operation.

I would like to take this opportunity to thank the CNSC, CNSC Staff and all Intervenors in this public hearing. The transparency of 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.

Before closing I would like to gratefully acknowledge the support we received from the CNSC's Participant Funding Program.

Bob Walker
National Director
Canadian Nuclear Workers' Council