



CMD 21-M33.3

Date: 2021-11-12

File / dossier : 6.02.04

Edocs pdf : 6677393

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

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

**Regulatory Oversight Report for
Uranium and Nuclear Substance
Processing Facilities and Research
Reactors in Canada: 2020**

**Rapport de surveillance
réglementaire des installations
de traitement de l'uranium et des
substances nucléaires ainsi que
des réacteurs de recherche au
Canada : 2020**

Commission Meeting

Réunion de la Commission

December 16, 2021

Le 16 décembre 2021



Canadian Nuclear Workers' Council

244 Eglinton Ave E, Toronto, ON, Canada M4P 1K2 | Tel: 416-804-5542 | cnwc-cctn.ca

November 12, 2021

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

Members of the Canadian Nuclear Safety Commission (CNSC)

RE: Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities and Research Reactors in Canada: 2020

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's Annual Regulatory Oversight Report (ROR) for Uranium and Nuclear Substance Processing Facilities and Research Reactors in Canada for 2020, Reference CMD 20-M33. Please include this letter for the Commission's public meeting scheduled for December 15-16, 2021. The CNWC is a regular intervenor at CNSC proceedings.

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry since 1993. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

Specific to this submission CNWC Member Unions represent Workers at the Uranium Processing Facilities: Cameco Fuel Manufacturing, Cameco Port Hope Conversion Facility and BWXT Nuclear Energy Canada (NEC). Workers at Cameco Fuel Manufacturing in Port Hope and Cobourg and the Cameco Port Hope Conversion Facility are represented by locals of the United Steel Workers (USW) and Workers at BWXT NEC in Toronto and Peterborough are represented by locals of UNIFOR and the International Federation of Professional and Technical Engineers (IFPTE). District Labour Councils in Lindsay and Northumberland are also Members of the CNWC.

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.

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

Safeguarding the continued health and safety of our Members is always our top priority. This is true for the CNWC and all of our Member Unions. We work with our employers to ensure this is always a priority. 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 families and friends. We take our responsibilities seriously.

Through the pandemic the CNWC Board of Directors maintained regular communications. Our conference was cancelled for 2020 and 2021 but CNWC Members have stayed connected. We plan to resume our in-person conferences in 2022. The conferences have proven to be an effective means of learning more about Canada's Nuclear Industry and provided opportunities to tour all of Canada's nuclear facilities. I have toured all of the facilities mentioned above and participated in the CNSC public hearing for the BWXT NEC licence renewal in March 2020.

The CNWC reviewed the Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities and Research Reactors in Canada for 2020. We are in full support of the assessment and findings of CNSC Staff and their conclusion that Uranium Processing Facilities in Canada operated safely in 2020.

We note that CNSC Staff confirmed:

- radiation protection programs at all facilities were effective and adequately controlled radiation exposures, keeping doses ALARA
- environmental protection programs at all facilities were effective in protecting people and the environment
- conventional health and safety programs at all facilities continued to protect workers
- ratings were "satisfactory" in all 14 SCAs for all facilities.

We believe that Cameco and BWXT continue to make adequate provisions for the health, safety and security of workers, the public and the environment.

We would like to take this opportunity to thank the Commission, CNSC Staff and all Intervenors in this public meeting. This public process helps keep our workplaces and communities safe. Thank-you.

If you have any questions for the CNWC please let me know.

Respectfully submitted,

Bob Walker
National Director
Canadian Nuclear Workers' Council
bwalker@cnwc-cctn.ca