



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 la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022



Canadian Nuclear Workers' Council

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March 28, 2022

Members of the Commission
c/o Louise Levert
Senior Tribunal Officer, Commission Secrétariat
Canadian Nuclear Safety Commission
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Reference 2022-H02

CNWC Submission regarding the Application from New Brunswick Power Corporation (NB Power) for the renewal of the Point Lepreau Nuclear Generating Station (PLNGS) Power Reactor Operating Licence (PROL) 17.01/2022.

Dear President Velshi and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the CNSC Public Hearing regarding the application from NB Power for the renewal of the PROL for the PLNGS. The CNWC is also requesting an opportunity to make an oral presentation at the CNSC Public Hearing - Part 2, scheduled for May 11-12, 2022.

The CNWC supports renewing the PLNGS PROL.

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as an association 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, engineering, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning. Our Membership also includes District Labour Councils in a number of host communities.

The International Brotherhood of Electrical Workers (IBEW) Local 37, representing the Women and Men employed at NB Power's PLNGS, is an active Member of the CNWC. The Saint John District Labour Council is also a Member.

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,
- enhance public knowledge about the many benefits of Canada's Nuclear Industry, and
- share our experiences with one another.

The CNWC engages in a number of activities to further our goals including an annual conference for CNWC Members in communities hosting Canada's nuclear facilities. Our last in-person conference was held in 2019 in Saint John, New Brunswick. That conference included a comprehensive tour of the PLNGS. Participants were very impressed by the high level of employee engagement and the obvious pride employees had for their plant.

The CNWC is a regular participant in the regulatory process.

The CNWC has reviewed NB Power's application, CMD 22-H2.1 and CMD 22-H2.1A as well as CNSC Staff's assessment of that application, CMD 22-H2 and CMD 22-H2A. We previously reviewed the 2020 performance of the PLNGS in preparation for our submission on the Regulatory Oversight Report for Canada's Nuclear Generating Sites: 2020. We also reached out to IBEW Local 37 and NB Power.

NB Power's Application

PLNGS is home to a CANDU 6 PHWR and a Solid Radioactive Waste Management Facility. The plant was returned to service in 2012 following a plant refurbishment. The current 5-year PROL expires on June 30, 2022. NB Power has mature programs in place for all safety and control areas (SCAs), met licence conditions and operated the station safely throughout the current licence period. A Periodic Safety Review (PSR) was completed and an implementation plan (IIP) developed to address findings. CNSC staff accepted that IIP on June 30, 2021. NB Power applied for a renewal with a requested period of 25 years. The CNWC supports the application from NB Power as set out in CMD 22-H2.1 and H2.1A except for the requested licence period.

CNSC Staff's Assessment on NB Power's application

The CNWC supports CNSC Staff's assessment, conclusions and recommendations as set out in CMD 22-H2 and 22-H2A except for the recommendation for a 20 year licence period. More specifically, we agree that:

- NB Power is qualified to carry out the activities authorized by the licence, and
- NB Power has adequate provisions in place for the health and safety of people and protection of the environment.

Although we agree with CNSC Staff's assessment we do not support the recommended 20 year licence period and suggest a licence period of no greater than 10 years.

CNWC Thoughts on PROL Licence Periods

CNSC PROL periods used to be considerably shorter. CNSC public hearings provide intervenors with an opportunity to ask questions and raise concerns and helped drive engagement. Valuable engagement often happens while preparing for public hearings and public meetings. We understand that public hearings use a lot of valuable time and resources which resulted in pressure to lengthen licence periods. The CNWC and CNWC Members supported those longer licence periods with the understanding there would be other opportunities for public engagement within those licence periods such as mid-licence reviews and annual regulatory oversight reports (RORs). The licence periods for the nuclear power plants grew to 5 years then more recently 10 years. 10 years is the longest licence period we have supported. Now the use of the annual RORs is under review. We're concerned about how this will all affect accountability and public engagement. CNSC Staff will continue to have the power to enforce licence conditions but enforcement is not always the most proactive tool. The Commission needs an opportunity to consider changes in company priorities, changes in safety culture, changing events, new/updated technologies, standards and regulations. Longer licence periods are a fundamental shift in the approach to nuclear regulatory oversight in Canada and we're concerned the result could be a lower level of engagement. We suggest a licence period of no greater than 10 years with an assurance that the public will have a meaningful opportunity to be heard within that licence period.

Concluding Remarks

PLNGS provides a reliable supply of electricity for New Brunswick without greenhouse gas emissions. It also provides the type of high-quality jobs we need more of. The standards of workplace health and safety we see in Canada's nuclear power plants, including PLNGS, are second to none. The work being done at the PLNGS will continue to support the next generation of clean nuclear energy. There continues to be strong community support for the PLNGS. The socio-economic benefits cannot be overstated.

The CNWC has the utmost confidence that NB Power will continue operating the PLNGS to the highest standards. We've had three of our annual conferences in Saint John to date and our conference participants have always been impressed. The relationship between the IBEW and NB Power's PLNGS is something we've all learned from.

In conclusion, the CNWC has reviewed the application from NB Power as well as the assessment from CNSC Staff. We support NB Power's application to renew the PLNGS PROL and we support CNSC Staff's assessment, conclusions and recommendation to renew the PLNGS PROL. The only exception to that support is our suggestion that the licence period be no more than 10 years.

Thank you for the opportunity to share our thoughts on this proposed licence renewal.

I would once again like to use our submission as an opportunity to thank the Members of the Commission and CNSC Staff. Your continuous efforts serve to make our workplaces and communities safer.

Bob Walker
National Director
Canadian Nuclear Workers' Council

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