



Oral presentation

Exposé oral

Written submission from the International Brotherhood of Electrical Workers (IBEW), Local 37

Mémoire de la Fraternité internationale des ouvriers en électricité (FIOE), section locale 37

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



March 28, 2022

Senior Tribunal Officer,
Secretariat Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046,
Station B Ottawa, ON
K1P 5S9

IBEW Local 37 Submission to the Canadian Nuclear Safety Commission (CNSC) regarding NB Power's application for a twenty five-year renewal of its Nuclear Power Reactor Operating License for the Point Lepreau Nuclear Generating Station.

Dear Members of the Commission:

The International Brotherhood of Electrical Workers (IBEW), Local 37, conditionally supports NB Power's application for the renewal of its Nuclear Power Reactor Operating License for the Point Lepreau Nuclear Generating Station (PLNGS).

Background

The IBEW is the largest union of electrical workers in the world, with over 700,000 members. Recognized as one of the most progressive unions, and the founding principle of the IBEW was safety, and today the safety of our members and the public remains our number one priority. And we continue to take pride in improving the lives of our members, their families, and the communities in which they live.

Our international union has extensive experience representing workers in North America's nuclear industry. Approximately 15,000 IBEW members are directly employed to operate, maintain, and provide support at 69 operating nuclear reactors in the United States and Canada. An additional 70,000 IBEW members are regularly involved as temporary contractors or vendor specialty crews to provide service and maintenance to the North American fleet of reactors. The IBEW has staff devoted to nuclear matters, and each year hosts a Nuclear Conference so that IBEW members in the nuclear industry can share operating experience and best practices.

In New Brunswick, IBEW Local 37 represents 93% of NB Power's 2700 employees and they are engaged in all aspects of the utility's operation. This includes representing 94% of all NB Power employees working at PLNGS. IBEW has been representing members at PLNGS since the plant began operating in 1983.



Work in the nuclear industry is extremely complex, requiring significant skill sets. Our members working at PLNGS are highly skilled and experienced and have a significant impact on ensuring the safe and effective operation of the Station. In addition, NB Power consistently places the safety of the public and their employees first. The company has invested in a high level of education and training for their employees to ensure PLNGS operates safely and reliably. Many of them live with their families in communities near the Station which demonstrates their confidence in the safety of the facility.

Our support for the license renewal is based on the following:

- The CNSC staff conclusion that NB Power is qualified to carry out the activities authorized by the license (as per subsection 24(4) of the Nuclear Safety and Control Act (NSCA))
- The CNSC staff conclusion that “NB Power has adequate provisions for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.”
- The CNSC staff recommendations for the Commission to:
 - "Accept CNSC staff conclusions and recommendations presented”
 - “Exercise its authority under the NSCA to renew the license to authorize NB Power to continue to operate the Point Lepreau NGS.”
- We believe that the plant has a strong focus on equipment reliability which ensures the long-term operation of the Station.
- PLNGS consistently meets or exceeds the CNSC’s licensing conditions and all safety requirements.
- PLNGS was recognized in 2019 for improved performance by the World Association of Nuclear Operators (WANO). Its current rating is consistent with strong performing Stations throughout the nuclear industry.
- NB Power has dedicated considerable time, effort, and resources into understanding nuclear industry operating experience and have implemented a number of programs to assure employees and the public that the plant operates safely. These programs include:
 - Enhanced standby generation
 - Continued work on the Severe Accident Management Guidelines
 - Improvements to the fire protection program
- Feedback and work experience of IBEW members who participate in the operation and maintenance of the facility on a day-to-day basis. Our members have the required skills to operate and maintain the Station and they work constantly to improve their education and training.
- Nuclear energy is a practical, low carbon, and economic base-load source of electricity that does not pollute the air, nor produce carbon dioxide.

- The positive working relationship we have forged with NB Power over the past four decades.

I'd like to share Local 37's observations of how some key initiatives and cooperative effort have been put into action to protect and support the health and safety of workers and surrounding communities, and how assurances are made to the public that PLNGS is reliable and operating safely.

IBEW Code of Excellence

Local 37 developed and implemented a peer-delivered training program (2017) for all members on the IBEW's Code of Excellence Program (COE). The COE is a commitment to hard work and integrity that sets our members apart in the workplace. At its core are five shared values that we describe using the acronym "SPARQ": Safety, Professionalism, Accountability, Relationships and Quality. We engaged our members in multiple focus groups, and they describe these shared values as follows:

- *Safety*- we are committed to having the safest possible workplace.
- *Professionalism* - we take pride in our work through unsurpassed professionalism, the best work ethic, and the highest standards.
- *Accountability*- we are accountable to one another to support each other's success at work.
- *Relationships* - we are committed to building positive working relationships because they are key to supportive and respectful workplaces.
- *Quality*- we are committed to bringing our best to work every day in order to deliver the highest quality work possible.

NB Power fully supports the COE program and as indicated in our collective agreement where they have agreed to allow time during working hours to deliver Code of Excellence training to all unionized employees. We are currently in the process of updating the presentation and will provide training to all members who have not yet received it. We will also have provisions to offer refresher training to members who already received it.

Shared Commitment to Safety

Local 37's long history of working with NB Power has led to a strong, positive working relationship where we share a commitment to safety.

In 2013, the leadership of both IBEW Local 37 and NB Power formally renewed our shared commitment to safety by developing the "Shared Safety Commitment Document" which has been adopted company wide. It is a formal commitment to work together to prevent accidents and injuries and is used in workers' annual performance appraisals.

In 2021, as part of a regular review process, the document was updated by an IBEW/NB Power committee that worked together to look for opportunities to help focus on being proactive and preventative. Following are the six key responsibilities of the revised Shared Commitment Document, which was signed on September 7, 2021:

NB Power and IBEW Local 37 are working together to enhance our workplace safety and its culture. Together, we can prevent accidents and injuries.

We share these commitments.

WE WILL ALWAYS:

PLAN SAFETY INTO OUR WORK

Prevent accidents by making sure safety controls are planned into every job we do. Before starting any work assess and inspect our work location to spot safety hazards and control or fix them to minimize risk. All employees will be given the information they need to be safe.

FOLLOW THE RULES

Avoid hazards by knowing and following all safety policies, practices, and procedures.

BE A LEADER IN SAFETY

Everyone can lead by example by working safely to prevent accidents and injuries. A safe workplace culture requires enough time, people, tools, knowledge, and resources to do the job safely. This includes taking the necessary time to be mindful and manage distractions.

REPORT SO WE CAN ALL GET BETTER

Report safety incidents and near misses right away. Sharing the facts ensures everyone is safer next time.

HAVE COURAGE

Speak up when you see potential dangers. Get involved if you believe someone is unfit for work or not trained for a task. Always give, encourage, and accept feedback.

SAY NO TO UNSAFE WORK

It's your legal right, and our expectation, that you refuse unsafe work. All jobs are planned with safety in mind. If you aren't sure, don't guess. Stop the work and ask your supervisor.

We're very proud that our efforts with NB Power continue to support the safe operation of PLNGS and the health and safety of the employees, the public, and the environment. As well, many of our NB Power workplaces, including PLNGS, have achieved significant milestones of operation without incurring a lost-time injury. Point Lepreau is a recognized leader in workplace safety, and it remains the number priority. It's decades-long safety record clearly demonstrates that the Station continues to operate at the highest levels of safety and environmental protection. And it is because of the workers' commitment to learning, training, and excellence in everything they do that the Station has exceeded two-million person hours without a lost-time accident on several occasions.

Radiological Safety

I'm very pleased that in addition to conventional safety, radiological safety is incorporated into all areas of planning and is repeatedly emphasized during the plan of day, work group meetings, and pre-job briefings.

There is a high level of Radiation Protection training provided to contractors and Station staff with many trained to the advanced "Yellow" and "Green" level of Radiation Protection. The Radiation Protection and Health Physics department staff are readily available and accessible to employees and contractors to provide advice and assistance on radiation protection practices and dosimetry so that work can be completed safely in accordance with ALARA ("as low as reasonably achievable") principles. Radiation dose remains well below the regulatory limit.

Protection Assistants and Protection Companions work with supervisors, contractors, and employees to ensure safety practices are followed. Monthly safety statistics are provided to our union, and we are kept apprised of any emerging safety concerns.

Onsite Emergency Response Team (ERT) and nuclear emergency preparedness

Emergency preparedness is part of the culture at PLNGS and includes conducting preventive activities and practice drills on a regular basis. Since 2011, NB Power Nuclear has had a full-time, onsite ERT in place to act as first response to fire, chemical, radiological, or medical emergencies. The ERT is comprised of IBEW members who are involved in a continuous training program to maintain and enhance their ability to respond to emergencies.

In addition, emergency response preparedness and response plans are tested regularly, including full-scale, multi-jurisdiction exercises. The most recent exercise, "Synergy Challenge 2021", was held in October 2021. This two-day event, with over 1000 participants tested the preparedness of PLNGS, NB Power, government and non-government organizations and agencies to respond to a simulated nuclear emergency initiated by a cyber-attack on the power grid. The successful exercise demonstrated the ability to respond to a highly unlikely nuclear emergency.

Joint Health & Safety Committee (JHSC) / Labour Management Committee

IBEW Local 37 has many members participating in monthly Joint Health & Safety Committee and Labour Management Committee meetings onsite at PLNGS. These committees are a collaboration of IBEW members working at PLNGS, as well as management representatives. These committees have been very effective in assuring that any issues, whether related to health, safety or otherwise are identified and handled as quickly and effectively as possible.

IBEW Local 37 and NB Power have also been holding a monthly Corporate Safety meeting for over 25 years. These meetings are primarily focused on addressing issues and ways to improve safety culture.

In addition, the leadership teams of both IBEW Local 37 and NB Power meet quarterly to bring up labour and safety issues that may remain unresolved at the local level.

Community/ Public/ Shareholder/ Rightsholder Engagement

Looking outside of the work site, many IBEW members working at PLNGS support a variety of NB Power activities that engage communities, the public, and Aboriginal rights holders. The activities help improve lives, protect the environment, celebrate culture, encourage education, and build healthy communities in areas adjacent to the Station.

Indigenous peoples and communities are very important to both NB Power and IBEW and PLNGS is committed to maintaining and growing their relationships with them, placing a focus on those that have indicated an interest in their nuclear operations.

NB Power is committed to keeping its stakeholders informed and earning their trust. The company maintains an active public information program that our members are involved with regarding the operation of PLNGS. This program is designed to ensure that timely information about the operation and activities of the Station is communicated in an open and transparent way.

This past December, NB Power hosted a virtual information session about the safe and reliable operation of PLNGS and its license renewal application. And most recently, they hosted three public, in-person information sessions in March. Local 37 members were significantly involved in all of these activities.

General Comments

- PLNGS and its employees play an important role within the environment, economy, and social fabric of New Brunswick.
- The public can trust that the IBEW members working at PLNGS have the highest level of training, experience, and expertise to ensure that safe and reliable operation will continue.
- The Station remains a vital source of base-load generation which supplies more than one-third of the electricity used in the province, without emitting carbon dioxide or other atmospheric pollutants during operation. It is a key contributor to the province's clean energy mix today and will be well into the future.
- The existence of PLNGS also supports a variety of post-secondary education programs at the University of New Brunswick and the New Brunswick Community College, and regularly provides work-term employment opportunities for students at both institutions.
- PLNGS is key source of employment in New Brunswick, employing over 900 employees directly, and a larger number of indirect and induced jobs within the region. These employees contribute significantly throughout southern New Brunswick, both through economic activity and by participating as members of their communities.
- Point Lepreau employees generously support local community organizations through volunteer efforts and contributions.

Conclusion

IBEW Local 37 believes that NB Power has established, and continues to promote, a positive health and safety culture, and we are pleased to be a part of that culture's growth and success. Our members are always able to provide input for enhanced safety measures that ensure continued improvements for the safe operation of PLNGS.

It is our opinion that the Station will continue to operate in a safe manner that is in full compliance with NB Power's nuclear power reactor operating license, and with great care for the environment, and surrounding communities. NB Power consistently places the safety of the public and their employees first. They have invested in a high level of training for their employees to ensure PLNGS operates safely and reliably. They believe in open, honest communication which has created an atmosphere where employees can freely identify issues and concerns.

In conclusion, IBEW Local 37 has no concerns from a safety, technical, or equipment standpoint for a lengthy renewal period. And although we support NB Power's application for the renewal of its license for PLNGS, we do wish to share our concern that the length requested would not allow for the regular opportunity for our members to engage in a formal process to provide comment to the CNSC.

We recognize that the union currently has regular meetings with NB Power, however, we would like to maintain the formal opportunity to interact with the CNSC, since we cannot predict the future.

Therefore, our support for a lengthy renewal period is conditional on having the assurances in place that there will be provisions to allow for a tri-partite review and consultation process for the union, the licensee, and the CNSC, and that it would occur on a regular basis.

Please accept this letter as IBEW Local 37's written submission to be presented to the Commission. We also request the opportunity make an oral presentation to the Commission at the public hearings being held May 11-12, 2022 in Saint John, NB.

Sincerely,

A handwritten signature in cursive script that reads "Claude Richard". The signature is written in black ink and is positioned above the typed name.

Claude Richard
Business Manager