



CANADIAN
NUCLEAR
WORKERS' COUNCIL

**SUBMISSION TO THE
CANADIAN NUCLEAR SAFETY COMMISSION**

FOR

**CANADIAN NUCLEAR LABORATORIES (CNL) OPERATING
LICENSE RENEWAL FOR THE CHALK RIVER
LABORATORIES**

DECEMBER 11, 2017

Members of the Commission:

The Canadian Nuclear Workers Council (CNWC) is an organization that is comprised of Unions that represent workers in Canada's Nuclear Industry. **The CNWC is the collective voice of the Unions in Canada's Nuclear Industries.**

The CNWC member Unions at the CNL Chalk River Laboratories Site (CRL) are:

- United Steel Workers (USW) Locals 1568 & 4096
- Professional Institute of the Public Service of Canada (PIPSC)
- Power Workers Union (PWU)
- International Union of Operating Engineers (IUOE))

These Unions represent the majority of the workers at the site.

The CNWC has in consultation with our member Unions reviewed the Submissions from CNL and the CNSC Staff related to the request for the license renewal of the facility for a 10 year period.

The CNWC will comment on the following areas of the reports.

- Worker Conventional Safety
- Radiation safety
- Environment
- Public Perceptions
- Labour Relations
- Conclusions

Worker Conventional Safety

Our member unions have a strong track record of proactively identifying and working to eliminate and control any potential threats to human health and safety and to the environment.

Canada's nuclear industry is among the most highly regulated and safety-conscious industry in the world. The industry's record for conventional (non-radiation related) safety is also exceptional.

The health and safety of workers at CRL is covered by Federal Legislation and through collective bargaining agreements.

The CNWC fully endorses and supports the very active health and safety culture promoted and established by CNL.

The leadership of the on-site unions continues to work with management to maintain a strong safety culture and the effectiveness of the Joint Health and Safety Committee (JHSC) at Chalk River. The JHSC, which meets once per month, comprises members representing the on-site unions and eight members from CNL management the unions also have a representative on the CNL Health & Safety Policy Committee

The frequency and severity rates for industrial lost-time injuries at the Chalk River site are very good compared to the average for industrial establishments in Ontario. We are confident that these numbers will go down as staff manages their work through applied safety training and safe work practices.

Under Health and Safety legislation workers have the right to refuse work assignments they consider to be unduly hazardous. Worker safety refusals occur from time to time and are usually settled at the shop floor level.

If there were any health and safety or environmental matters of potential threat to CRL workers, the public and/or their families living in nearby communities that were not being addressed expeditiously, we would hear about it. No such matter has been raised during the current licensing period.

The CNWC concurs with the CNSC Staff's recommendation under 3.8.4 "CNSC Staff conclude that CNL continues to implement and maintain an effective conventional health & safety program at CRL in accordance with regulatory requirements."

Radiation Safety

During the current licensing period, no employee received a whole-body dose in excess of the 20 mSv limit and the number of employees who received a dose in excess of 10 mSv has been trending downward. Through continued training and support, we are equally assured that management and the on-site unions, will work together to maintain and improve radiation exposures.

The efforts of the JHSC are reflected in the continuing reduction in radiation exposure to Chalk River employees during the current license period.

Environment

The CNWC's member union's member's live in communities around the Chalk River Site and have done so since its existence which is over sixty years. There are many third generation family workers at this site.

Our member unions and their memberships have a keen interest in ensuring that their families live and play in healthy and safe communities. Additionally, unionized workers also have a strong commitment to the protection of the public and the environment.

The Commission and the Public can be assured that if any environmental threat to the environment occurs on the CRL site that the Unions on site will bring it to the immediate attention of their employer and if necessary to the attention of the CNSC.

PUBLIC PERCEPTION

A large segment of the community immediately adjacent to CRL comprises CNL employees and their families who in turn are active in various local organizations.

These workers are frequently asked questions about the CRL site. They assure the public that Chalk River Site is a safe place to work and presents no hazard to the community. After all, if they feel protected as workers, the communities should have no worries that their health and safety is at risk. In the unlikely event of any on site incidents, staff is well trained to respond to any emergency and to take immediate and safe action to reduce any potential impacts.

As the site has been in operation for over 60 years the local residents are comfortable living in the vicinity.

CNL's public relations program also keeps the local people assured that the site is safe and also updates them on any events on site.

The CNWC member unions suggest that a very high majority of the local residents are fully supportive of the site and that most of the opponents are from distant locations.

LABOUR RELATIONS

During this license period the workers have gone through some major work place changes. Change naturally cause anxiety, fear and frustration. There has been a changeover in the workplace staff during this period. An influx of new young workers has occurred.

There remains some anxiety at the NRU with pending job losses when the reactor is shut down in 2018... Overall in most departments the worker mood is very good and moral is high. Workers are looking forward to being involved in the many new projects proposed by their employer in the coming years.

Labour Relations are never perfect in a workplace, but it is important to have the means to resolve disputes in a timely manner. At CRL the unions all have grievance procedures in their collective agreements which provide a means to resolve disputes. Once the internal process is completed then there is a provision for third party resolution via the mediation/arbitration process. This external process is utilized when required.

The Union representatives meet with site senior management regularly to discuss issues. By keeping Union Representatives informed by good communications workplace concerns are kept at a minimum.

At this time some of the collective agreements between the onsite unions & CNL have or will be expired and the parties are working their way through the collective bargaining process. This process normally creates some frustrations for the employees and the employer but in recent years agreements have been reached.

The Commission and the public can be assured that labour relations issues will in no way affect the safety of workers, the site or the public.

CONCLUSIONS

At the public hearing on January 23/24, 2018 the Commission will have the opportunity to hear the views of some of the union leaders in regards to the above issues and we will welcome any questions that you may have.

The CNWC and our member unions at CRL are in full support of the license renewal for a ten year period The CNWC also concurs with the CNSC Staff's conclusion that:

1CNL is qualified to carry on the activities authorized by the license; and

will in carrying out the licensed activities, has made, and will continue to make adequate provision 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.

Respectfully submitted

David Shier - National Director