

SUBMISSION TO THE
CANADIAN NUCLEAR SAFETY COMMISSION

In the matter of

**THE RENEWAL OF THE OPERATING LICENSES
FOR THE CAMECO CORPORATION'S KEY LAKE
URANIUM MILL AND THE MCARTHUR RIVER
URANIUM MINE**

Submitted by the



CANADIAN NUCLEAR WORKERS' COUNCIL
and the



United Steel Workers Union (USW) local 8914

August 14, 2008

Members of the Commission:

The Canadian Nuclear Workers Council (CNWC) is a council of Unions that have members working in the Canadian Nuclear Industry. A copy of the Council's Member Unions is attached.

The United Steel Workers America (USWA) Local 8914 represents Cameco workers at the McArthur River and Key Lake sites.

The CNWC and USW Local 8914 have reviewed and support the analysis and conclusions of CNSC Staff as set out in CMD 04-H17 dated June 11, 2008, CMD 04-H17.A dated June 11, 2008, CMD 04-H 18, CMD-H18.A, and CMD 07-H5.

The Canadian Nuclear Workers' Council (CNWC) and the United Steel Workers Union (USW), Local 8914 wish to register their support for the renewal of the Operating licenses for the Cameco Corporation's McArthur River Uranium Mine and the Key Lake Uranium Mill facilities in Saskatchewan.

Representatives from the CNWC member unions toured the McArthur River Mine during their annual convention in 2007 which was held in Saskatoon. This tour provided a different set of eyes to review this facility. Tour participants consisted of workers in other sectors of the Canadian nuclear Industry and some of their spouses. The tour participants expressed a high level of comfort with the level of health and safety that they experienced on the tour. As well they were impressed by the environmental controls and respect for the environment that they witnessed during their time at the site.

The CNWC organized a tour of the McArthur River Mine for local and national Labour Union leaders in 2007. These tour participants echoed the same sentiments as the participants on the CNWC toured described above.

In 2004 the CNWC organized and participated in an independent investigation in regards to some issues around the 2004 McArthur River Mine flood event. (A copy of the report from this investigation can be obtained from our web site at www.cnwc-cctn.ca).

The CNWC as well as the USW place worker safety very high on their agendas. We believe that the following statement which was in the above report and was also in our submission to the Commission in the 2004 licensing hearings for McArthur River Mine and Key Lake Mill is worth repeating:

“One lesson we were particularly pleased to learn about is that when workers are in doubt about their safety or protection from radiation hazards, they are not afraid to refuse to work in the area in question until it has been confirmed to be safe. The United Steel Workers Union has fought long and hard to ensure workers can feel free to protect their safety without sanctions from their employer and that provision is a part of our collective agreement with Cameco. The reported instances of workers refusing work in some areas is confirmation of success in this regard. It is a success that can be shared with Cameco since workers report no difficulty or debate from their supervisors when they took such actions and report that immediate steps were taken by Cameco to confirm and ensure conditions were safe. “

We have been assured by the onsite Union that the above statement is still true today.

A large contributing factor to the safety record of these sites is due in large part to, the capable and experienced unionized work force. It is the opinion of both the CNWC and the USW that a unionized workplace is much safer than a non unionized workplace. This was confirmed in the CNWC Study of 2004.

The mine Health and Safety Committees (one at key lake Mill and one at McArthur River Mine) consist of both union and management representatives with the union representatives being appointed by the United Steel Workers. The Committee has full access to all reports, studies, and tests relating to health and safety of employees. It receives detailed reports from various company officers responsible for the environmental, health, and safety aspects of operations. It meets monthly to address any and all health and safety issues and conducts regular workplace inspections. Its activities provide the workforce with a high level of confidence that the workplace is safe and the environment is protected.

The union supports some of the new safety processes that have been put in place by the employer over the past few years such as the employee safety card program. These programs are designed to change and improve safety culture. The union leadership confirms that the safety culture is improving but it will take time.

Workers have all received upgraded radiological safety training during the past few years. (This was a recommendation of the CNWC 04 Report).

It is important that workers be provided with regular upgrade training in radiological and conventional Health and safety. All levels of management must be committed to improved safety culture and performance.

It should be noted that the USW places the safety of their members very high on their agenda. This Union is a pioneer in safety worker health and safety and has been at the forefront of many legislative health safety amendments over the years.

The union has established relationships of mutual cooperation with several regulatory bodies such as; the Saskatchewan Department of Labour, Mine Inspectors, and Boiler Inspectors. This has helped them to implement new ideas and they shall continue to improve upon these relationships to the benefit of all employees.

In addition, USW Local 1318 has continued to network with other unions and employee groups in the Uranium industry. This has allowed the Union representatives to provide information and education **to their** membership on various issues, such as dealing with radiation exposure and how it can be reduced.

Historically the USW Local 1894 has had a good working relationship with Cameco to discuss and resolve labour issues. This is not to say that it is a perfect world at these workplaces. With several hundred workers employed at these sites there are always issues for Union/management to deal with. It should also be noted that in late 2007 there were local leadership elections conducted by the USW. The elections resulted in many changes in the union site leadership. This is viewed as a positive as new people have different and new ideas and the only negative is that takes time for new union/management relationships to develop.

We would also like to provide the CNSC with some broader insight into the benefits of the Key Lake and McArthur River operations in northern Saskatchewan. This is a region that is sparsely populated and without a strong economic base. Over the past twenty years the uranium industry has become the largest employer in the region as well as the best paying one. The training and employment of northern people, most of aboriginal ancestry, has provided many northern communities with an alternative to traditional occupations. Today, about half the employees at the two mines are northern residents and most are of aboriginal ancestry. There are also many women employed at these sites in non traditional jobs.

The license application refers to the new Systematic Approach to Training (SAT) which has been implemented at Cameco. The union agrees with the CNSC Staff conclusion in this regard. As this is a different approach to training it will take some time to have it fully implemented.

The nature of the seven day in – seven day out, commute operation also allows northern people the opportunity to practise a traditional life style part of the month and industrial employment for part of the month. This is a unique Canadian accomplishment and Cameco as an employer should be congratulated for its initiative in this regard. Of course it has been the hard work of the men and women from northern Saskatchewan who have been the ones to translate this opportunity into a reality. The union movement welcomes these new aboriginal brothers and sisters.

The uranium industry has served Saskatchewan well over the years but it has not always been without a cost. In the early days of its development, in the Uranium City area, mines were much less safe and the working conditions were often the cause of serious concerns. The United Steel Workers Union has been active in advocating worker safety and independent regulation of uranium mines for many decades. Fortunately over the years, progressive leadership of governments, industry and labour unions has improved working conditions to the point where the mines and their related facilities have become attractive and much sought after places of employment.

The beneficial impacts on Saskatchewan of the uranium industry are significant. A number of northern roads are supported because of the traffic produced by the industry; a modern power grid is possible because the uranium mining industry has provided a base load demand sufficient to justify its cost. Air transport facilities developed to service the mines also contribute to industries such as tourism and small businesses.

In concluding, it is the view of the Canadian Nuclear Workers Council and United Steel Workers of America Local 8914 that these projects have earned the support of labour and the communities in which they are located by virtue of their track record of good health and safety practises, employment of aboriginal workers, good environmental citizenship and a significant overall contribution to the regional and provincial economy.

During our oral presentation at the public hearing on September 17 in Saskatoon we will have one of our female representatives provide a shop floor worker perspective of working at these sites.

As indicated above the CNWC and USW local 8914 are both in full support of the license renewal for both the Key Lake Mill and the McArthur River Mine.

Respectfully submitted:

David Shier

President CNWC

Janice Curry

CNWC Executive and USW Representative

Membership of the Canadian Nuclear Workers' Council

Canadian Union of Public Employees

Locals 1500 & 267

Communication, Energy & Paper Workers Union

Local 599

International Association of Firefighters

Whiteshell

International Association of Machinist & Aerospace Workers

Local 608

International Brotherhood of Electrical Workers

Local 79

Power Workers Union

Professional Institute of the Public Service of Canada (PIPS) CRPEG & WRPEG

Public Service Alliance of Canada

Kanata

United Steel Workers

Locals 8914, 7806, 14193, 13713

Chalk River Technicians and Technologist Union

Allied Trades Council