



**CANADIAN
NUCLEAR**
WORKERS' COUNCIL

**Canadian Nuclear Workers' Council
Presentation
To**

**The Joint Review Panel Public Hearing
For
Ontario Power Generation's
Deep Geological Repository (DGR) Project &
Application for a License to Prepare the Site**

JULY 21, 2014.

MEMBERS OF THE PANEL

The Canadian Nuclear Workers Council (CNWC) was founded in 1993 as an umbrella organization of Unions that represent workers in all sectors of the Canadian Nuclear Industry. A list of the member Unions and the purpose and objectives of the council are attached as Appendices A & B.

The CNWC provided a written and an oral presentation to the 2013 Panel Hearings. We have reviewed the additional information, (as it pertains to the CNWC). We must say upfront that from our analysis the CNWC agrees and still supports the Canadian Nuclear Safety Commission's Staff conclusions **THAT THIS PROJECT WILL NOT LIKELY SIGNIFICANTLY ADVERSLY AFFECT THE ENVIRONMENT.**

CNWC member Unions are all very familiar with low and medium level radiological waste and have safely handled and stored these materials for over 50 years.

The CNWC will comment on the following areas of the Amended Public Hearing Procedures:

- Relative risk analysis of alternative means of carrying out the project. Specifically in reference to workers responsibilities for safety.
- Implications of revisions to the reference waste inventory. Specifically in regards to waste reduction.
- Applicability of recent incidents at the Waste Isolation Pilot Plant (WIPP) to the safety case for the DGR project. Specifically in regards to worker and public safety at the DGR.

RISK ANALYSIS

The CNWC reviewed the Risk Analysis data that was submitted by OPG.

We believe that risk analysis is a term that the public does not use or understand. Our organization interacts with the public at many venues and we never hear people talk about risk analysis. However we believe that people do perform a risk analysis on many issues in their lives. People evaluate the information they have and make a decision on

what action they take. This may apply to where they live, where they work, how they travel, etc.

Whether the term is risk analysis or something else the public has to have the correct information to make decisions. In regards to the DGR, we suggest that the silent majority of the public has made their evaluation (risk analysis) and are in support of the proposed project. On the other hand the vocal minorities of the public who oppose the project have done their evaluation (risk analysis) on, we suggest, flawed information or they have based their decision on their fundamental position that anything related to nuclear power is not acceptable.

We do note that in the Report of the Independent Expert Group submitted by OPG there is a reference that people who work at the current waste facility and who will work at the proposed project are considered to be helpful to the public in their decision on risk assessment as these workers share similar values to their own.

During our oral presentation one of our retired CNWC executive members, Mr. Kevin MacKay, who resides in the vicinity of the DGR will provide a short view of risk perspective as it relates to the public in the area where he resides.

WASTE INVENTORY

The CNWC firmly believes that there are opportunities to reduce the amount of waste that will be needed to be placed in the DGR. Technological advances in this area now and in the future will contribute to the reduction of waste. For example the project to reduce the waste from the steam generators from the Bruce A refurbishment project is a very good example of how reductions could occur.

During our oral presentation one of our current CNWC Executive members, from Bruce County, Mr. Howard Phorson, will provide a brief overview of our position on waste reduction.

APPLICABILITY OF RECENT INCIDENTS AT THE WASTE ISOLATION PILOT PLANT (WIPP)

One of our CNWC member Unions, United Steel Workers (USW), represents the workers at WIPP. The USW is a major player in the nuclear industry in Canada and the USA. At the time of writing representatives from the CNWC have had discussions with the USW representatives at the WIPP site and are currently planning a visit to their site. We will report further in this regard during our oral presentation to the Panel.

We agree that there are always lessons learned from any incidents. Unionized workplaces are very good at sharing information especially in regards to worker safety.

The WIPP site is a similar facility to the proposed OPG DGR but there are differences, especially in regards to worker safety etc.

Some of the differences are:

- WIPP is owned by the Department of Energy (DOE) and operated by a private consortium. Whereas the DGR will be owned and operated by OPG.
- WIPP is regulated via the DOE & not the American Nuclear Regulator – Nuclear Regulatory Commission (NRC). The OPG DGR will be regulated by the Canadian Nuclear Safety Commission (CNSC).

Why are these differences important? It is our view that they have an effect on worker safety and public safety.

In our discussions with the USW it has been clear that the DOE regulations are in our view inferior to the regulations that the current OPG WWMF & the OPG DGR will be covered by. The CNSC regulations in our view are and will be much higher than DOE requirements. The USW informs us that they have an ongoing battle in regards to workplace safety issues etc with their employer as the DOE will pass issues to the Consortium and vice versa and as a result resolution to issues is very slow and sometimes non-existent.

In simple terms the WIPP is a mining operation. In Canada our Uranium Mines are regulated by the CNSC. Our uranium mines have very good safety programs and performance. The OPG DGR will in our view have the same stringent requirements that the uranium mines currently enjoy. This will ensure that worker safety will be held in high regard which also ensures public safety.

It should also be noted that worker safety, legislation along with union involvement is in our view at a lower level at the WIPP site. This aspect will be covered in depth by our member union, the Power Workers.

In conclusion we are convinced that the WIPP incidents are not applicable to the proposed OPG DGR.

In conclusion we are fully supportive of OPG receiving a License to prepare the site and proceed with construction of the DGR. Our CNWC on site member Unions, The Power Workers Union (PWU) & the Society of Energy Professionals (SEP) will operate the facility and will be on site during construction. The PWU & SEP will be following the progress of the facilities and will be able to provide additional “eyes and ears” in respect of worker safety and environmental issues.

Once again the CNWC is of the opinion that the proposed OPG DGR is not likely to significantly adversely affect the environment and encourages the Panel to accept the EIS and to proceed to granting OPG a license to prepare the site and proceed to construction of the DGR.

Respectfully submitted

David Shier
President - CNWC

APPENDIX A

Objectives of the Canadian Nuclear Workers' Council

- to ensure that the interests and perspective of nuclear workers are heard by decision-makers;
- to strengthen the collective role of nuclear workers as a partner in their industry;
- to enhance public knowledge and understanding of nuclear issues by providing factual information; and
- To build support for the nuclear industry and its future potential.

APPENDIX B

Canadian Nuclear Workers' Council Member Unions

**Canadian Union of Public Employees
Locals 1500, 2200, & 267**

**Communication, Energy & Paper Workers Union
Local 599-O & Local 48 – S**

Canadian Auto Workers Union

International Association of Firefighters

**International Association of Machinist & Aerospace Workers
Local 608**

International Brotherhood of Electrical Workers

Power Workers Union

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

Public Service Alliance of Canada

**United Steel Workers
Locals 8914, 7806, 14193, 13713**

Society of Energy Professionals

Society of Professional Engineers & Associates (Candu Inc)

Hydro Quebec Professional Engineers Union

Grey Bruce Labour Council

Durham Region Labour Council

Northumberland Labour Council