



**CANADIAN
NUCLEAR**
WORKERS' COUNCIL

CANADIAN NUCLEAR WORKERS' COUNCIL
And the



United Steel Workers Union (USW) local 8914

SUBMISSION TO THE
CANADIAN NUCLEAR SAFETY COMMISSION

In the matter of

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

AUGUST 31, 2013

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 as Appendix A.

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

It should be noted that the USW has represented uranium miners in Canada back to the Elliot Lake Ontario days. The USW has very good expertise in workplace safety and the international union assists local unions as required.

The CNWC and USW Local 8914 have reviewed the CMD 13 H13 and CMD 13 H14 from CNSC Staff as well as CMD H13.1 and CMD H14.1 from Cameco.

Up front, the CNWC and USW local 8914 have concluded that they support the analysis and conclusions of CNSC Staff report for both sites.

We will comment on the following Safety Control Areas identified in the CDMs for both sites:

- Radiation Safety
- Conventional safety
- Human Performance Management
- Emergency Management & Fire Protection
- Environmental Protection

Key Lake Uranium Mill

Radiation Safety

USW members receive Radiation and regular requalification training from Cameco. The USW members on the site Health & Safety Committee review any radiological exposure incidents and can and will provide recommendations to Cameco to improve the process or training.

The CNWC & USW support the CNSC Staff's findings that the Radiation Safety Program is satisfactory.

Conventional Safety

The Occupational Health and Safety Committees at the Key Lake Mill consist of both union and Management representatives. The Union representatives are appointed by the United Steel Workers Local 8914. There are USW representatives from all departments on these committees. There are two committees so there are always USW Occupational Health & Safety representatives on Site. In addition, the Union Executive meets with the representatives on both committees to support and discuss safety issues.

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 employees 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 safety processes that have been put in place by the employer such as the employee safety card program. These programs are designed to change and improve safety culture.

There is an overlap with the two H&S Committees. The Union Executive meets with these reps on a regular basis to discuss and support safety issues.

In the spirit of mutual cooperation, the union has established relationships with several regulatory bodies, such as the Saskatchewan Department of Labour Relations & Workplace Safety, including Mine Inspectors as well as 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 8914 has continued to network with other unions and employee groups in the Nuclear 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.

The union leadership confirms that the safety culture has improved since the last re-License Hearings in 2008.

The CNWC & Local 8914 support the CNSC Staffs findings that Conventional Health & Safety is satisfactory at the Key Lake Site with an improving trend.

HUMAN PERFORMANCE MANGEMENT

Cameco's Systematic Approach to Training (SAT) is acceptable to USW local 8914. Workers have adapted to this process and all workers receive requalification training on a regular basis.

USW Local 8914 reports that the training of workers has improved.

The CNWC & USW Local 8914 agrees with the CNSC Staff conclusion that the Cameco has an effective training program in place for the safe operation of the mill, as well as the associated facilities.

Emergency Management & Fire Protection

USW members are fully trained and engaged in Emergency Response and Fire training etc. These skills also benefit their home communities as many of these workers volunteer as emergency responders when they are not at site.

The CNWC & USW local 8914 support the CNSC Staff conclusion that Cameco has made adequate provision to respond to emergencies including fires, and has in place an effective emergency management

McArthur River Uranium Mine

Radiation Safety

Workers at the McArthur River Mine have all received radiological safety and requalification training from Cameco as required.

As indicated with respect to Key Lake, the McArthur River Operation's Occupational Health & safety Committee reviews any worker radiological incidents and, where necessary, provides recommendations to Cameco management.

The USW local 8914 is of the view that radiological understanding and training for workers has improved.

In 2011 Cameco provided the CNWC with their basic Radiological Worker Safety programs. This material was utilized in training uranium miners in Africa and was well received by the Unions there.

The CNWC & USW Local 8914 support the CNSC Staff's findings that the worker Radiological Safety Programs at McArthur River Mine are satisfactory with an improving trend.

Conventional Safety

The USW Collective Agreement contains language about health & safety that exceeds the Saskatchewan Occupational Health & Safety Act. The site Occupational Health & safety Committee is structured similar to the Key Lake H&S Committee as outlined earlier in our submission.

The union fully supports the safety processes that have been put in place by Cameco, 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 has improved at the McArthur River Mine since the last re- license hearings in 2008.

In the spirit of mutual cooperation the union has established relationships with several regulatory bodies such as, the Saskatchewan Department of Labour Labour Relations and Workplace Safety, including Mine Inspectors, as well as 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.

On a regular basis the Union executive meets with the Occupational Health & Safety Representative from McArthur River Mine & the Key Lake Mill. This

provides a good forum to discuss lessons learned. Also, all employees have electronic access to records for all Health & Safety Incidents.

In addition, USW Local 8914 has continued to network with other unions and employee groups in the Nuclear Industry. This has allowed the Union representatives to provide information and education to their membership on various issues.

The CNWC & USW local 8914 support the CNSC Staffs findings on Conventional Safety.

Human Performance Management

As indicated above at the Key Lake Mill the Systematic Approach to Training (SAT) implemented by Cameco is also accepted and supported by USW 8914 at the McArthur River Mine.

The CNWC & USW Local 8914 support the CNSC staff' conclusions that Cameco has an effective training program in place to ensure the proper training of the mine's operational staff.

Emergency Management & Fire Protection

The USW Local 8914 members at McArthur River Mine are fully engaged in Emergency Response training. As with the Key Lake Mill this training also benefits the workers' home communities.

It should be noted that the McArthur River Mine's, Mine Rescue Team won the Saskatchewan Mine Rescue competition for 2013 and will now proceed to the Canadian National Competition.

CNWC & USW support the CNSC Staffs' findings in this area.

Environmental Protection

Our comments in this area relate to both the **Key Lake Mill and the McArthur River Uranium Mine.**

Directly or indirectly, issues relating to potential adverse environmental or safety impacts from the operation of these facilities will also presents a potential

adverse impact to the safety and health of the USW 8914 represented workers. . Whether arising from the design, condition, or operation of equipment, or from work policies, processes or practices, any deficiency which creates the potential of a significant adverse environmental or safety impact will be felt first by USW members. The USW local 8914 refuses to allow members to be exposed to accident, injury or illness from either conventional or radiological hazards.

It is because of this convergence of safety interests between Cameco's employees and the general public that the USW believes that whatever it can do to improve worker safety and health will almost certainly improve public safety, health, and the environment. Thus, the CNWC considers it appropriate in these submissions to approach safety from the workers' perspective.

As can be seen from our comments, above, in regards to the engagement of the USW in radiological safety and conventional safety at both sites, that they are also watch dogs on environmental issues.

The USW and it's member are very respectful of the environment and they will definitely raise any concerns that they have in this regard with their employer and if necessary with the CNSC.

The CNWC & USW local 8914 support the CNSC Staff findings that there has been satisfactory performance and an overall improving trend in the environmental management program.

Ten Year Licence

There has been much discussion in recent years in regards to the lengths of license periods. Initially the CNWC & USW were opposed to the longer license terms.

We now support the CNSC Staff's recommendation for a ten year license for these facilities. We base this on the fact that the CNSC staffs provide rigorous inspections of these facilities on a regular basis to ensure compliance. Also, the Union and it's members are a watch dog on site and would raise any non compliance issues with the CNSC. Further the CNSC Annual Report on the Performance of the Canadian Uranium Fuel Cycle and Processing Facilities provides another potential opportunity for the public and the union to address any concerns they may have.

GENERAL COMMENTS

The CNWC as well as the USW place worker safety very high on their agendas.

Representatives from the CNWC member unions over the years have toured the McArthur River Mine and the Key Lake Site on several occasions. These tours provided a different set of eyes to review the facilities. 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 as well as environmental protection that they experienced on these tours.

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 tour 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 which concluded that this matter was handled appropriately,

We believe that the following statement which was in the above report and was also in our submission to the Commission in the 2004 & 2008 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 and, in fact, safety culture has greatly improved since the time of the 2004 report.

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.

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.

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 plus 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 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 has made Cameco an attractive employment option.

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 of which many have become elected representatives with USW 8914.

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.

CONCLUSIONS

In concluding, it is the view of the Canadian Nuclear Workers Council and United Steel Workers Union 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 October 1 or 2 at la Ronge we will have one of our female representatives provide a shop floor worker perspective of working at these sites.

The CNWC & USW Local 8914 support the CNSC Staff's recommendation that Cameco is qualified to carry out the activities authorized by the Uranium Mill Operating Licence and the McArthur River Mine Operating License and will, in carrying out those activities, make adequate provision for the protection of the health and safety of persons, the environment and the maintenance of national security and the measures required to implementing international obligations to which Canada has agreed.

Respectfully submitted:

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Edward Morrelli

President CNWC

USW Local 8914 President

CNWC Site Rep

APPENDIX A

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**

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

Chalk River Technicians and Technologist Union

Society of Professional Engineers & Associates (Candu Inc)

Hydro Quebec Professional Engineers Union

Grey Bruce Labour Council

Durham Region Labour Council

Northumberland Labour Council