



## Canadian Nuclear Workers' Council

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August 31, 2015

Louise Levert  
Secretariat  
Canadian Nuclear Safety Commission  
280 Slater St. P.O. Box 1046  
Ottawa, Ontario  
K1P 5S9

Ms. Levert:

**RE: Regulatory Oversight Report for Uranium & Nuclear Processing Facilities in Canada – 2014**

Please include this submission for the September 30/October 1, 2015 meeting of the Commission.

The Canadian Nuclear Workers Council (CNWC) is the collective voice of the Labour Unions that represent workers in Canada's Nuclear Industry.

We have reviewed the above report, in consultation with our member unions, for the facilities where our member unions represent the workers. These unions are the United Steel Workers (USW) local 14193 at Cameco's Fuel Manufacturing Facility (CFM) in Port Hope, Ontario and the USW locals 13173 & 8562 at Cameco's Fuel Processing facility (CFPF) in Port Hope. At the GE – Hitachi facilities in Toronto and Peterborough, Ontario our member Unions are UNIFOR locals' 599-O, 252-O & 524 and local 164 of the International Federation of Professional & Technical Engineers Union (IFPTE).

The CNWC is in full support of the CNSC's staffs' findings that facilities identified above met the performance expectations for the health & safety of workers and the protection of the environment for 2014.

The CNWC and our member unions take the issue of worker health & safety very seriously. Our member unions work very closely with their employers on worker safety. All of these facilities have joint health and safety committees (JHSC) where the unions appoint the worker representatives. These unions all have additional provisions in their collective agreements for Health & Safety that exceeds legislative provisions. Union representatives participate on radiation protection ALARA committees. Union health and safety

representatives inspect their workplaces on a regular basis and are in contact with workers on a daily basis. This, plus additional provisions that apply to union representatives, ensures that any health and safety issues are addressed and resolved promptly. Workers are encouraged to report any safety issues and have the right to refuse unsafe work.

It should be noted that Union representatives also have access to CNSC inspectors if the need arises to help resolve worker safety issues.

Safe workplaces result in public safety and a safe environment. Workers in these facilities live in the vicinity of their workplaces and are therefore concerned with a safe environment. Workers report any environmental issues and have the support of their union and their employer.

CNWC member unions meet annually. This provides an opportunity for dialogue on worker safety issues where representatives can learn best practices from one another. Many of our CNWC delegates have toured these facilities over the years and have witnessed firsthand the good safety culture.

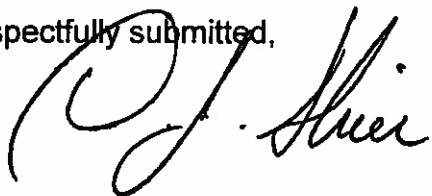
We should point out that some of the worker health and safety programs have been recognized externally. For example the USW unions at Cameco's Port Hope facilities were honored at a USW Health, Safety, & Environment Conference in Pittsburgh, USA, in April this year. They received an award for their efforts in Worker Health & Safety initiatives that included strong union safety committees, safety and health education, comprehensive accident investigation protocols, etc.

The CNWC commends the workplace parties for achieving a satisfactory rating by the CNSC staff for the worker safety and health in 2014. However, we challenge them to strive for a "Fully Satisfactory" rating for 2015.

The CNWC is in full support of the annual assessment process. It should be noted that the presence of the Unions in these workplaces provides another level of oversight for the issues assessed in these reports.

If the Commission has any questions from our submission, our CNWC Vice President, Chris Leavitt (USW 13173) will be in attendance at the public meeting on September 30/ Oct 1, 2015.

Respectfully submitted,



David Shier

President

*The Canadian Nuclear Workers' Council is comprised of Locals of the following unions: Canadian Union of Public Employees, International Association of Firefighters, International Association of Machinists & Aerospace Workers, International Brotherhood of Electrical Workers, Power Workers' Union, Professional Institute of the Public Service, Society of Energy Professionals, United Steelworkers, Union for Canada (UNIFOR), Union of Professional Engineers and Associates.*