



CANADIAN  
NUCLEAR  
WORKERS' COUNCIL

**SUBMISSION TO THE**

**CANADIAN NUCLEAR SAFETY COMMISSION**

**IN REGARDS TO**

**The Cameco Corporations application for a Ten Year Operating License for its Port Hope Uranium Conversion Facility (PHCF)**

**October 3, 2016**

## Members of the Commission

The Canadian Nuclear Workers Council (CNWC) is an umbrella organization of Unions representing workers in all sectors of the Canadian nuclear industry. It is ***the collective voice of organized labour in the nuclear industries.***

Founded in 1993, it represents sectors including electric power utilities, uranium mining and processing, radioisotope production for medical and industrial purposes, nuclear research, construction and trades in Ontario and labour councils in host communities.

CNWC activities are focused on the following objectives:

- Ensure that the interests and perspectives of nuclear workers are heard by decision-makers;
- Strengthen the collective role of nuclear workers as a partner in their industry;
- Enhance public knowledge and understanding of nuclear issues by providing factual information,
- Build support for the nuclear industry and its future potential

A list of the CNWC member Unions is attached as appendix 1.

The CNWC has reviewed the CNSC's Staff Report & Cameco's application for a license renewal in consultation with our member unions at Cameco's Port Hope Fuel Processing Facility (PHCF).

We will comment on the following areas of the Staff Report:

- Radiation Protection
- Conventional Health & Safety
- Environmental Protection
- Emergency Response
- Security

The two Unions at the PHCF are United Steel Workers (USW) local 13173 & USW 8562. USW 13173 represents the plant workers and USW 8562 represents the Security Staff.

## Radiation Protection & Conventional Health & Safety

The USW is the largest Industrial Union in North America. The USW places the Health & safety of its members very high on its agenda. The local unions at the PHCF have full access to the USW Health & Safety Professionals.

The two USW locals as members of the CNWC have access to other Unions in Canada's nuclear industry and from time to time consult them for advice on worker safety issues.

The two local Unions appoint members to the Joint safety and Health Committee at the PHCF. The Unions have negotiated provisions in their Collective Agreements that exceeds the regulatory minimums.

The CNWC concurs with the CNSC'S Staff Conclusions:

**CNSC staff have assessed Cameco's documentation and analyses under the Radiation Protection SCA and have found them to be acceptable. CNSC staff are also satisfied with Cameco's efforts in applying the ALARA principle to keep the doses to persons ALARA over the current licence period. CNSC staff therefore conclude that Cameco's overall performance for this SCA is satisfactory and that Cameco is qualified to carry out the authorized activities in this SCA.**

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It should also be noted that the USW recognized Locals 8562 and 13173 Health & Safety Committee members were honored at the 2015 United Steelworkers' Health and Safety and Environment Conference with two awards. Both locals were recognized with the A.Q. Evans Award for working with site leadership to establish effective safety and health programs.

Chris Leavitt, President of USW Local 13173 and several members of the site's safety committee were on hand to accept the award. Initiatives included a strong union safety committee, safety and health education, comprehensive accident investigation protocols and observation of the Day of Mourning.

Tim Gitzel, Cameco's President and CEO also presented the locals with the Mary Jean Mitchell Award for Safety. The partnership between the locals and management is expected to deliver more positive changes.

## **Environmental Protection**

The USW is very concerned about the environment. USW members at the PHCF live in the surrounding communities and are therefore naturally supporters of good environmental conditions. There are also many other workers that are members of other

CNWC member Unions that reside in the Port Hope vicinity. The fact that nuclear workers choose to live in this area indicates that they are satisfied with the safety and environmental conditions at the PHCF.

Union representatives and union members will raise any concerns with their employer if they believe there are environmental issues at the facility. Some USW members work in the environmental department.

The CNWC Concurs with the CNSC Staff's conclusion:

**CNSC staff have assessed Cameco's documentation and analyses under the Environmental Protection SCA and have found it to be acceptable. CNSC staff therefore conclude that Cameco's overall performance for this SCA is satisfactory and that Cameco is qualified to carry out the authorized activities in this SCA.**

## **Emergency Response & Fire Protection**

USW members comprise the emergency response team at the PHCF. These workers are highly trained and dedicated maintaining the safety of the site.

The CNWC concurs with the CNSC Staff's conclusion:

**CNSC staff have assessed Cameco PHCF documentation and analyses under the Emergency Management and Fire Protection SCA and concludes that Cameco has an acceptable emergency management and fire protection program. CNSC staff therefore conclude that Cameco's overall performance for this SCA is satisfactory and that Cameco is qualified to carry out the authorized activities in this SCA.**

## **Site Security**

The members of the security force at the site are members of the USW local 8562. These workers are highly trained and dedicated to security at the PHCF.

The CNWC supports the CNSC Staff's conclusion:

**CNSC staff have assessed Cameco's documentation and analyses under the SCA Nuclear Security and have found it to be acceptable. CNSC staff therefore conclude that Cameco's overall performance for this SCA is satisfactory and that Cameco is qualified to carry out the authorized activities in this SCA. CNSC staff conclude that Cameco has acceptable**

**security programs in place at the PHCF that meet regulatory requirements and make adequate provisions for the maintenance of national security.**

## **CONCLUSION**

Over the years many representatives from CNWC member unions have toured the PHCF and support the fact that it is a safe place to work and reside.

USW representatives keep the CNWC updated on any concerns, incidents, etc that occur at the site.

The CNWC supports the fact that the PHCF is a safe place to work and the proper safe guards are in place to protect workers and the public. If any unsafe or environmental hazards become an issue the onsite unions will bring them to the attention of their employer or if necessary to the attention of the commission.

The CNWC supports Cameco's request for a ten year license.

The CNWC will elaborate on the above issues at its oral presentation at the Public Hearing in November.

Respectfully submitted by

David Shier – CNWC President

## Canadian Nuclear Workers' Council Member Unions

International Association of Firefighters Local 160  
International Association of Machinist & Aerospace Workers Local 608  
International Brotherhood of Electrical Workers Local 37  
Power Workers Union  
Professional Institute of the Public Service of Canada (PIPS) CRPEG & WRPEG  
United Steel Workers Locals 8914, 7806, 14193, 13713, 8562, 1568  
Society of Energy Professionals  
International Federation of Professional & Technical Engineers Union local 164  
Society of Professional Engineers & Associates (Candu Inc)  
Ontario Building & Construction trades Council  
Grey Bruce Labour Council  
Durham Region Labour Council  
Northumberland Labour Council  
International Union of Operating Engineers Local 776  
UNIFOR Locals 252, 599, 48, 524