



## Canadian Nuclear Workers' Council

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July 16, 2017

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 Canadian Nuclear Power Plants – 2016**

Please include this letter for the August 16, 2017 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.

Our member Unions, the Power Workers Union (PWU) & the Society of Energy Professionals (SEP) represent the continuous workforce at the OPG's Pickering & Darlington NPPs & at Bruce Power Inc. The Ontario Construction & Building Trades' Council represents the construction trades that are employed on an ongoing basis for outage work etc at OPG and the Bruce Power Sites. The International Brotherhood of Electrical Workers local 37 represents the workers at the Point Lepreau NPP.

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The Canadian Nuclear Workers' Council is comprised of Locals of the following organizations: District Labour Councils (Grey/Bruce, Durham, Northumberland) \* International Association of Firefighters (160) \* International Association of Machinists & Aerospace Workers (608)\* International Brotherhood of Electrical Workers (37 & 363) \* Power Workers' Union \* Professional Institute of the Public Service \* Society of Energy Professionals Union \* Society of Professional Engineers and Associates Union \* UNIFOR (S-48, O-599,524 & O-252) \* United Steel Workers (1568, 4096, 13173, 8562, 8914 & 7806) \* International Federation of Professional & Technical Engineers Union (164) \* Professional Institute of Public Service Union \* Provincial Building and Construction Trades Council of Ontario\*

It should also be noted that the Labour Councils in the vicinity of the Bruce Power NPP & the OPG NPPs are also members of the CNWC.

The CNWC is in full support of the CNSC Staff's conclusion **that the NPPs operated safely during 2016.**

The CNWC will provide comments on the following areas of the oversight report:

- Radiation doses to members of the public were well below the regulatory limit.
- Radiation doses to workers at the NPPs were below the regulatory limits.
- The frequency and severity of non-radiological injuries to workers were very low.
- No radiological releases to the environment from the NPPs exceeded the regulatory limits.

### **Radiation doses to members of the public were well below the regulatory limit.**

Unionized workers at the NPPs take radiation safety very seriously. Their Unions are very active in working with their employers to ensure that radiation hazards are kept to a minimum. Workers also are members of the public and live in the communities adjacent to the NPPs. If worker radiation exposure is very low this ensures that public exposure is very low.

### **Radiation doses to workers at the NPPs were below the regulatory limits.**

As indicated above radiation safety is taken very seriously. Union appointed representatives work very closely with Employers at the NPPs to ensure that exposures are kept very low. Unionized workers have provisions in their collective agreements that ensure that workers work well below the radiation regulatory limit.

### **The frequency and severity of non-radiological injuries to workers were very low.**

Unionized Workers are encouraged and do report all incidents that will possibly affect their safety. Union representatives are very actively involved with their employers in regards to worker safety via legislated Joint Health & Safety Committees (JHSC) and via health and safety provisions in their collective agreements. NPPs are very safe worksites.

Local Union representatives and Union appointed Health & Safety Committee members are on the sites continuously and work independently as well as with their Employers on many issues on nearly a daily basis. All of the Unions are fully engaged with their employers on worker health & safety issues.

The CNWC maintains that a unionized workplace is a safer work place than a non-unionized workplace.

Commissioners may recall that this theory was questioned at a CNSC Public Hearing conducted in La Ronge, Saskatchewan on June 7, 2017. A Saskatchewan Ministry of Labour Safety Inspector told the Commission that he did not see a difference in worker safety between unionized vs non-unionized workplaces. The CNWC disagreed with the position of the inspector. Many studies support this fact that unionized workplaces are safer than non-union workplaces and we suggest that the inspector at the June 7, 2017 hearing erred in his statement.

### **No radiological releases to the environment from the NPPs exceeded the regulatory limits.**

Workers are very concerned with the environment and they ensure that it is protected as they perform their duties at the NPPs. Anything that will affect the environment will have an effect on workers first. By ensuring a safe workplace ensures the public and the environment is also kept safe.

CNWC member Unions work very closely with the Licensees of the NPPs. The CNWC and our member Unions also participate in the licensing and regulatory process by participating at licensing hearings, commenting on Reg Docs and any other area in the regulatory process where it benefits the safety of the public, the environment and the workplace.

Unionized facilities are safer workplaces as they among other things ensure that issues are addressed prior to becoming a threat to the H&S of the workplace, the public and / or the environment.

The safe operation of the NPP are very important to the CNWC and our member unions. We do note that with satisfactory & fully satisfactory ratings that there is still room for improvement and that the parties should strive for continuous improvement

The CNWC fully supports the annual CNSC Staff NPP Oversight Reports. With longer NPP Operating License terms it is very important that the annual report is provided. The report and the public process help ensure everyone that our Canadian Nuclear Power Plants are all operating safely.

Thank you for the opportunity to comment. If further information is required please contact us.

Respectfully submitted by,

David Shier – CNWC National Director