



SUBMISSION TO THE  
**CANADIAN NUCLEAR SAFETY COMMISSION**

In the matter of

**THE RENEWAL OF THE URANIUM MINE OPERATING  
LICENSE TO AUTHORIZE AREVA TO OPERATE THE  
MCLEAN LAKE OPERATIONS (MLO)**

April 21, 2017

The Canadian Nuclear Workers Council (CNWC) is the collective voice of organized labour in Canada's Nuclear Industries.

Our member Unions are located in Saskatchewan, Manitoba, Ontario, and New Brunswick. A list of our member unions is attached as Appendix A

The Union, UNIFOR 48S, at Areva Resources Canada Inc's McLean Lake Operation is a long time member of the CNWC.

The CNWC has reviewed the information provided by the licensee, AREVA Resources Inc as well as the CNSC Staff's report. The CNWC will comment on the following areas of the license application:

- **Conventional Health & Safety**
- **Radiation Protection**
- **Environmental Protection**
- **License Term**
- **General Comments & Conclusions**

## **Conventional Health & Safety**

Unions always place the Health & Safety of their members very high on their agendas. A Unionized workplace is a safer workplace compared to a nonunionized work site.

As reported by the CNSC Staff Report and AREVA's Application there is a very active worker health and safety program at the McLean lake Mill. This has also been confirmed to the CNWC by our member Union at the site.

The onsite Union, UNIFOR 48S, has the full support of their National Union, UNIFOR, in regards to Health & Safety. UNIFOR has a large Health & Safety department to assist their local Unions when assistance is required.

UNIFOR 48S, as a member of the CNSC also has access to other Unions in the Nuclear Industry for advice on safety issues.

A safe work site for workers results in safety for the community.

## **Radiation Protection**

The onsite Union is fully engaged with their Employer with the radiation Protection Programs. The ALARA principle is very effective at the work site as can be seen on the Dose Charts contained in the CNSC Staff's Report.

## **Environmental Protection**

Environmental concerns are very important to the workers at MLO. Their local Union as well as their National Union, UNIFOR, are very active in environmental issues.

Many of the workers at MLO reside in communities in the vicinity of the site and are very environmental conscious. Any environmental issues that have the potential or may arise would have the attention of these workers. The Commission and the public can be assured that these workers will definitely bring any environmental concerns to their Union or to their Employer or both immediately.

## **License Term**

The CNWC has some concerns with a 12 year license. It appears that license terms have been steadily increasing. It was not long ago that 2 -3 year licenses were the norm. Then they went to 5 years and now 10 years appear to be the normal. Is twelve years the next target for licensees?

Our organization was originally opposed to longer licenses unless there was a midterm review. Now we have been in agreement with extended license periods as there is a CNSC Oversight report.

We do understand the situation for a 12 year license for the MLO for this license renewal.

Longer license terms are viewed by some as reducing the transparency of the industry. We suggest that some discussion is required as to where the cut off for the increasing license terms will be.

## **General Comments**

Many CNWC delegates have toured the MLO over the years and have been very impressed with the worker safety and environmental programs at the site. These representative are nuclear workers from other nuclear Worksites across Canada and therefore are familiar with what safety and environmental programs should contain.

Many representatives from UNIFOR 48S have attended the CNWC annual Conferences. At these conferences they provide and answer questions about the MLO. This event also provides them the opportunity to tour other nuclear facilities and to also discuss Health & Safety and other similar issues with their colleagues in the Nuclear Industry.

The MLO worksite provides good jobs for the northern Saskatchewan region as well as to other areas of the province. This is good for the economy as well as the population.

## **Conclusions**

The Public and the Commission can be assured that the onsite Union, UNIFOR 48S and the CNWC will raise any worker or public safety concerns as well as any potential environmental issues to the Employer or if necessary to the CNSC.

The CNWC supports AREVA's Application for the license renewal of the MLO and the CNSC's Staff report (except where noted above in regards to the term of the license).

**Respectfully Submitted**

**David Shier -CNWC National Director**

## **APPENDIX A**

### **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 & 863**

**INTERNATIONAL TECHNICAL Federation of Professional & technical Engineers  
(IFPTE) Local 164**

**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 IFPTE Local 160**

**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- O, 599 –O, 48 – S, 524 – O, 252**