



CANADIAN  
NUCLEAR  
WORKERS' COUNCIL

**SUBMISSION TO THE**

**CANADIAN NUCLEAR SAFETY COMMISSION**

**FOR**

**BRUCE POWER INC, OPERATING LICENSE RENEWAL FOR**  
**BRUCE A & B NUCLEAR POWER STATIONS**

APRIL 16, 201

## **Members of the Commission:**

The Canadian Nuclear Workers Council (CNWC) is an organization that is comprised of Unions that represent workers in Canada's Nuclear Industry. **The CNWC is the collective voice of the Unions in Canada's Nuclear Industries.**

The CNWC member Unions at the Bruce Power site are:

- Power Workers Union (PWU)
- Society of United Professionals (SUP)
- Ontario Building and Construction Trades Council of Ontario (OBCTCO)

The local labour council, the Grey Bruce labour Council (GBLC) is also a member of the CNWC.

The PWU & SUP represent the operational day to day regular staff at the Bruce Site. These two unions represent approximately 3700 workers at the site which is over 90% of the regular workforce.

The OBCTCO is a council of unions of the Construction and Building Trades Unions. These unions are on site for projects and outages. The number of workers will vary on a day to day basis. At the time of writing there were approximately 50 workers on site from the OBCTCO. This number will rise to several thousand during outages and during the upcoming refurbishment projects.

Our member Unions as well as the GBLC have also provided submissions in support of the relicense of the facility. The CNWC will attempt to not duplicate these submissions.

The CNWC has in consultation with our member Unions reviewed the Submissions from Bruce Power and the CNSC Staff related to the request for the license renewal of the facility for a 10 year period.

The CNWC will comment on the following areas of the reports.

- Worker Conventional Safety
- Radiation safety
- Environment
- Public Perceptions
- Term of License
- Conclusions

## **WORKER SAFETY - Conventional**

The Nuclear Industry in Canada is a highly unionized sector. Unions place the health and safety of their members at the top of their agenda.

Workplace Health & Safety is legislated by provincial and federal statutes. It is very common in nuclear facilities' that the unions negotiate many provisions for health & safety which well exceed the minimum stated in legislation. This is the case at Bruce Power.

There is a very extensive worker health & safety program at Bruce Power which involves the onsite unions. These provisions are covered extensively in the submission from the Power Workers Union & the Society of United Professionals so we will not repeat them here.

The OBCTCO has a Health & Safety Trades Committee which is separate from the operations Joint Health and Safety Committees (JHSC). The OBCTCO Union workers as indicated above come and go so they do work at other job sites. These workers will indicate that worker safety is a very high priority at Bruce Power and it is one of the safest worksites that they work at.

The CNWC has always maintained that a Unionized worksite is a much safer worksite versus a non-union worksite. This fact was disputed at a CNSC hearing in Saskatchewan last year where we suggest that the Commissioners were provided with false information by the Saskatchewan Labour's Chief Safety Inspector, Mr. Kaskin. Due to the statement made at that hearing we are restating our position and providing data that supports our position that a unionized worksite is safer than a non-unionized site.

Attached is a list of studies that support our position. We draw your attention to one study in particular which was conducted in Ontario in which the CNWC member Union OCBCTO was involved, a summary of the study is attached which provides a link to the actual study.

In general these studies found the following:

- Unionized workers receive more safety training.
- Unionized workers have fewer injuries requiring time off work.
- Unionized workplace enables unions to better identify & proactively manage workplace hazards that lead to injuries.
- More incidents/accidents are reported on unionized sites.
- Unionized workers are encouraged to report injuries, including those that do not require time away from work.

The CNWC believes that worker safety is a very high priority with the Bruce Power Board of Directors. We are reassured in this belief as one of the Board members, Don

MacKinnon, is the past president of our member Union the PWU. Mr. Mackinnon was/is a champion of worker health and safety.

There is a very strong safety culture at Bruce Power which is very noticeable during plant tours and in discussion with workers from the site.

The Unions provide a thorough oversight for worker safety. It should be comforting to the Commission & the public that workers carry out their duties in a very safe environment. If workers are safe then the public will be safe.

**The CNWC fully supports the CNSC Staff's conclusion - CNSC staff determined that Bruce Power continued to implement and maintain a conventional health and safety program at Bruce A and B in accordance with CNSC requirements.**

## **RADIATION SAFETY**

The onsite Unions are actively involved with the Employer in regards to radiation safety. Radiological concerns can be raised by the JHSC and also by the Joint Radiation Committee (JCRP). Over the years the parties have been successful in putting many measures in place to reduce radiation exposures.

The PWU & SUP will provide more details in this regard in their submissions to the Commission

**The CNWC fully supports the CNSC Staff's conclusion that Bruce Power exceeds regulatory requirements for conventional safety and radiological safety for workers.**

## **ENVIRONMENT**

Workers and their unions are naturally concerned with environmental issues. Any issues that are of a concern will be brought to the attention of the employer by workers or their union.

## **TERM OF LICENSE**

The CNWC supports the CNSC Staff's recommendation to issue a ten year license. In the past the CNWC was opposed to the continuing increasing license terms. We now believe that with the introduction of the annual NPP CNSC Staff's reviews that a ten year license will suffice.

## **PUBLIC PERCEPTION & SUPPORT**

The Grey Bruce Labour Council, are also members of the public. This organization has attended a tour of the Bruce Site on several occasions the latest being in October 2017. These delegates were able to witness the operation of the facility and get their questions answered. The GBLC is in contact with several organizations and members of the public. They are the CNWC's eyes in the community. They inform us that there is a high level of support for the relicensing of Bruce Power among the local residence in the vicinity & beyond the site.

At the day 2 hearing, the GBLC President, will be assisting with the CNWC oral presentation and will be available for any questions you may have in regards to the GBLC.

The CNWC has outreach programs where we dialogue with labour organizations in regards to nuclear power issues. The CNWC also has been involved with several MPs & MPP lobbies in the past two years as well as coordinating tours and briefing sessions for Ontario MPs and candidates for the upcoming Ontario election. We have found that these people are generally supportive of the nuclear industry in Canada and specifically in Ontario.

The CNWC being a Labour Organization respects dissenting views and debate. However, we suggest that some of the dissenting groups distribute misinformation which creates concerns.

During our activities we hear the public's concerns. Our message to them is "**make your decision on nuclear power issues on facts and not on emotion**". In many incidences we find that after people get their questions answered they are supportive.

The CNWC believes the silent majority of the public are supportive of the Bruce Power License renewal.

The CNWC has taken the lead for several local supportive organizations for an on line petition in support of the Bruce Power's License Renewal. The results of the petition will be include with our presentation for the Day 2 hearing

The CNWC commends Bruce Power for its outreach programs in the community. It is clear that the public is engaged.

## **UNION COLLABORATION**

As you have heard from Bruce Power there is a high level of collaboration between the management staff of nuclear facilities in Canada. This information sharing has many benefits and is supported by the CNWC. The CNWC member Unions also collaborate on issue especially worker safety issues of which we believe benefits to the workers, the CNSC, and the industry.

## **CONCLUSIONS**

The Bruce Site is a very safe place to work. The Unions and their members are highly trained and dedicated to safe operation of the facility.

The CNWC can assure the commission and the public that any issue that concerns public safety or worker safety will be addressed immediately.

It goes without saying that the continuing operation of Bruce Power is very good for the local and the Ontario economy as well as the environment.

The CNWC is in full support of Bruce Power Inc's application for a 10 year Operating license Renewal for the Bruce A & B Nuclear Power Stations.

Respectfully submitted

**David Shier**  
**National Director**