



Canadian Nuclear Workers' Council

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October 7, 2019

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 Laboratories' Sites 2018

Please include this letter for the November 6/7, 2019 meeting 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 CNL Sites are:

- United Steel Workers (USW) Locals 1568 & 4096 (CRL)
- Professional Institute of the Public Service of Canada (PIPSC) (CRL)
- Power Workers' Union (PWU) (CRL)
- Building & Construction Trades Council of Ontario (Port Hope/Port Granby)
- Laborers International Union (LIUNA) (Port Hope/Port Granby)
- International Federation of Firefighters (IAFF) (Pinawa)

In most cases these Unions, above, represent the majority of the workers at the CNL Sites specifically CRL, Pinawa, & Port Hope/Port Granby. Some of their members from time to time also work at other CNL Sites.

All these unions participate in site Joint Health & Safety Committees. There is also a CNL Corporate health & safety committee which includes Union Representatives. Safety is a high priority for these unions and this results in a very good safety culture.

When necessary, union representatives, consult with CNSC Site Staff.

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)* Power Workers' Union * Professional Institute of the Public Service * Public Service Alliance of Canada * United Steelworkers of America * Society of Energy Professionals Union * Society of Professional Engineers and Associates Union* UNIFOR (the Union of Canada) (S-48, O-599 & O-252) * United Steel Workers (14193, 13173, 8562, 8914 & 7806) * International Federation of Professional & Technical Engineers Union * Provincial Building and Construction Trades Council of Ontario*

It is important to remember that there are studies that have proven that unionized workplaces are safer than non-unionized workplaces. Unions also provide an oversight for the safe operation of these facilities. A safe workplace also results in a safe community in the vicinity of these CNL Sites.

The CNWC participated in the License Hearing for the CRL in 2018.

The CNWC has, in consultation with our member Unions, reviewed the 2018 oversight report from the CNSC Staff. The CNWC concurs with the CNSC's findings as listed below for all sites with the exception of the PHAI.

Overall, CNSC staff's compliance activities determined that:

- Radiation protection programs at all sites adequately controlled radiation exposures, keeping doses as low as reasonably achievable (ALARA)
- Environmental protection programs at all sites were effective at protecting people and the environment
- Conventional health and safety programs at all sites continued to protect workers

Therefore, CNSC staff conclude that in 2018, the CNL sites covered by this regulatory oversight report made adequate provisions for the health and safety of workers, the protection of the public and the environment, and Canada's international obligations.

In regards to the PHAI. The Big Trades represent the Construction unions on site and they provide a voice to many open shop workers on site. The workers reported that they face safety issues. It appears there is a lack of training.

It should be noted that at the time of writing our submission, **the Building & Construction Trades Council of Ontario** has requested that the Federal Government appoint an independent, non-profit third party to provide oversight of the radiation protection of the workers at the Port Hope /Port Granby CNL work sites.

This would be in addition to the oversight provided by the Canadian Nuclear Safety Commission.

The Building Trades Council's submissions are being made directly to the Minister of Natural Resources, as well as to CNSC, AECL, and CNL.

The CNWC is in support of the annual reports and we suggest that it is important that the public is aware that the on-site unions participate in this process.

If any of the Commissioners have any questions for the CNWC we will be pleased to respond.

David Shier

National Director