



Canadian Nuclear Workers' Council

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Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
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Members of the Canadian Nuclear Safety Commission

Cameco Corporation's application to renew its Class IB nuclear fuel facility operating licence for Cameco Fuel Manufacturing Inc. (CFM), FFOL-3641.00/2022.

Reference CMD 21-H105

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in support of the application from Cameco Corporation for a one-year renewal for its Class IB nuclear fuel facility operating licence for their CFM in Port Hope, Ontario (FFOL-3641.00/2022). Please accept this letter as our written submission for the December 17, 2021 hearing in writing.

The Canadian Nuclear Workers' Council has been the collective voice of Unionized Workers across Canada's Nuclear Industry since 1993. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication facilities, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning. The CNWC routinely participates in CNSC proceedings.

Specific to this submission the United Steel Workers (USW) represents Workers at CFM. USW and the Northumberland District Labour Council are Members of the CNWC.

The published goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard by decision makers,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's nuclear industries, and
- enhance public knowledge about the many benefits of Canada's nuclear industry.

The Canadian Nuclear Workers' Council is comprised of Locals of the following organizations: District Labour Councils (Grey/Bruce, Durham, Northumberland) * International Association of Firefighters * International Association of Machinists & Aerospace Workers * International Brotherhood of Electrical Workers * Power Workers' Union * Professional Institute of the Public Service * Public Service Alliance of Canada * Society of United Professionals * Society of Professional Engineers and Associates * UNIFOR * United Steel Workers * International Federation of Professional & Technical Engineers * Provincial Building and Construction Trades Council of Ontario*

In support of those goals we encourage all industry stakeholders to share experiences and continue to be leaders as knowledge and standards evolve.

For the CNWC and all of our Member Unions, the health and safety of our Members is paramount. We believe that one of the benefits of high occupational health and safety standards is better environmental stewardship and that safe workplaces result in safer communities. Nuclear Workers take the responsibility to protect the health and safety of people and the environment seriously.

CNWC Members have remained connected through the pandemic but we look forward to resuming an in-person conference in 2022. Our conferences have been an effective opportunity for Members to learn more about Canada's nuclear industry and provided opportunities to tour Canada's nuclear facilities including Cameco's facilities in Port Hope and Cobourg.

The CNWC has reviewed the application from Cameco, reference CMD 21-H105.1 and submissions from CNSC Staff, reference CMD 21-H105 and H105A. We fully support CNSC Staff's assessment and their conclusion that Cameco is qualified to carry on the activities authorized by the licence and, in carrying out those activities, will make adequate provisions for the protection of people and the environment.

We note that Cameco has met all regulatory requirements during the term of the current licence and continues to receive ratings of 'Satisfactory' in all 14 Safety and Control Areas (SCA). Cameco continues to make adequate provisions for the health, safety and security of workers, the public and the environment. CNSC Staff confirmed that radiation protection measures were effective and radiation doses were kept as low as reasonably achievable (ALARA), environmental protection programs were effective, and conventional health and safety programs protected workers.

The CNWC supports Cameco's application and CNSC Staff's recommendation that the Commission issue the proposed 1-year licence for the operation of the CFM facility.

We note that Cameco has stated they intend to apply for a 10-year licence renewal for CFM and we anticipate a full public hearing in 2022. The CNWC plans to intervene.

We would like to take this opportunity to thank the Commission, CNSC Staff and all Intervenors in this public hearing. This public process and the continuous oversight of the CNSC and CNSC Staff all benefit our workplaces and communities.

If you have any questions for the CNWC please let me know.

Respectfully submitted,

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