



Canadian Nuclear Workers' Council

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Members of the Commission

c/o Louise Levert
Senior Tribunal Officer, Commission Secrétariat
Canadian Nuclear Safety Commission
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Reference 2022-H12

Application to renew the Class IB nuclear fuel facility licence for Cameco Fuel Manufacturing Inc., FFOL-3641.00/2023.

Dear President Velshi and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the Canadian Nuclear Safety Commission (CNSC) public hearing regarding the application from Cameco Corporation to renew the Class IB nuclear fuel facility operating licence for the Cameco Fuel Manufacturing Inc. (CFM) facility in Port Hope, Ontario (FFOL-3641.00/2023).

The CNWC is also requesting an opportunity to make an oral presentation at the CNSC Public Hearing scheduled for November 23/24, 2022.

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as an association of Unions representing Workers across Canada's nuclear industry. Our Membership encompasses uranium mines and mills, nuclear fuel production, nuclear power plant (NPP) operation and maintenance, engineering, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning.

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*

The 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,
- enhance public knowledge about the benefits of Canada's Nuclear Industry, and
- share our experiences with each other.

The CNWC engages in a number of activities to further our goals including a newsletter, website, updates to Member Unions, lobbying, outreach and an annual conference for CNWC Members that we rotate amongst the various communities hosting Canada's nuclear facilities. We previously held a conference in Port Hope and had an opportunity to tour Cameco's facilities. Our conferences have been a great opportunity for Members to tour Canada's nuclear facilities and learn more about Canada's nuclear industry. The CNWC is also a regular participant in the regulatory process for Canada's nuclear industry.

Specific to this submission, the United Steel Workers (USW) Local 14193 represents Workers at CFM. USW Local 14193 and the Northumberland District Labour Council are Members of the CNWC. I have been in discussion with Local 14193 about CFM's application to renew their FFOL. They are in full support of the application and are submitting their own intervention.

Safeguarding the continued health and safety of our Members is always the priority for the CNWC and all of our Member Unions. One of the benefits of high occupational health and safety standards is better environmental stewardship. Safe workplaces result in safer communities. We work with our employers to ensure this is always top of mind. Nuclear Workers live, work and play in our nuclear host communities along with their families and friends. We take our responsibilities personally and seriously.

In preparation for this submission we reviewed the information found on both the Cameco and CNSC websites including Cameco's application, the submission from Cameco, CMD 22-H12.1 and the submission from CNSC Staff, CMD 22-H12

CFM's Application

CFM is a wholly owned subsidiary of Cameco Corporation. CFM operates a fuel fabrication facility located in Port Hope, Ontario that manufactures CANDU fuel bundles. They also operate a specialty metals fabrication facility in Cobourg, Ontario. Cameco has been safely producing CANDU fuel bundles in Port Hope for more than 50 years. CFM's current FFOL is a one year term issued following a hearing in writing in 2021. It expires on February 28, 2023. The CNWC submitted a written intervention last year in support of the current FFOL.

The current application includes a request to renew CFM's Class IB Nuclear FFO for a period of 20 years. The application also requests an increased annual production limit to 1,650 tonnes of uranium as uranium dioxide (UO₂) pellets. This reflects the current capacity of the facility. The application is not seeking a licence change for any new activities or changes to management systems or reporting requirements.

CFM has clearly demonstrated their commitment to operating the facility safely. They have met all regulatory requirements during the term of the current licence and continue to receive ratings of 'Satisfactory' in all 14 Safety and Control Areas (SCA). Their programs to protect the environment and the health and safety of people have been effective.

CNSC Staff's Assessment of CFM's application

The CNWC fully supports CNSC Staff's assessment, conclusions and recommendations.

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.

We believe that CNSC Staff have reached the appropriate findings and conclusions, specifically:

- CFM's performance has been satisfactory and met all regulatory requirements.
- CFM is qualified to carry on the activities authorized by the licence.
- In carrying out those activities CFM will make adequate provisions for the protection of the environment and the health and safety of persons.

We support CNSC Staff's recommendations, specifically:

- The Commission approve the issuance of a 20-year FFO for the operation of the CFM facility, effective March 1, 2023 to February 28, 2043.
- The Commission approve CFM's request to increase the annual production limit for the CFM facility to 1,650 tonnes of uranium as uranium dioxide pellets.
- The Commission require a comprehensive performance update to the Commission at the midpoint of the licence term.

Concluding Remarks

Canada's nuclear industry is important for Canada and for all Canadians. Nuclear energy provides us with a secure source of clean, reliable electricity without greenhouse gas emissions. This is becoming increasingly important as concerns grow regarding the effects of climate change. Nuclear also provides us with medical isotopes, high-quality employment, economic growth and the innovation we will need for our clean energy future. Cameco is an essential part of our nuclear industry

Cameco has a proven history of operating the facility safely and they have been a great community partner. The CNWC fully supports Cameco's application and CNSC Staff's recommendation that the Commission issue the proposed licence renewal.

I would once again like to use our submission as an opportunity to thank the Commission, CNSC Staff and all Intervenors. This public process and strong regulatory oversight serve to protect the environment and maintain the high level of health and safety in our workplaces and our communities.

Respectfully submitted,

A handwritten signature in cursive script that reads "RL Walker".

Bob Walker
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