



Canadian Nuclear Workers Council

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Mr. M. Dallaire
Director General
Regulatory Policy Directorate
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario

Canadian Nuclear Workers Council Comments on the DIS 12 – 07, Safety Culture Submissions from licensees and others

Dear Mr. Dallaire:

The Canadian Nuclear Workers Council (CNWC) is an organization which consists of the Unions that represent workers in Canada's Nuclear Power Industry. Our member Unions represent the workers at the licensed Facilities that submitted comments on DIS – 12 – 07.

The CNWC has reviewed DIS 12 – 07 and the comments that the CNSC has received from licensees and others. We wish to provide some general comments on the submissions.

First of all we must indicate that we are in full support of a strong safety culture in Nuclear Power Facilities in Canada and support the CNSC concept of having a Safety Culture regulation for Licensees.

Most of the comments on DIS 12 – 07 focus on the safety culture definition, self assessment, and assessment teams. Our comments will be in these areas.

We suggest that CNWC member unions should be actively involved in developing a definition for Safety Culture that can have the consensus of Licensees, CNSC, and Unions.

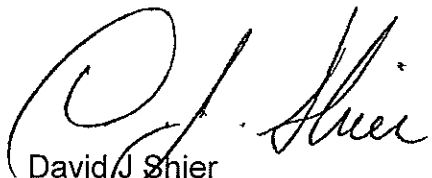
CNWC member unions are very active in workplace health and safety. Legislation mandates that workers via their unions are to be involved in workplace health & safety. It is clear that front line workers have a vested interest and a good understanding of safety aspects in their workplace. Further many of our members have negotiated into their collective agreements enhanced health safety rights. This we suggest indicates that workers via their unions are stakeholders in CNSC licensed facilities.

From the above we conclude that there should be as stated in the Society of Energy Professional's comments that there must be Union appointed representatives on any Safety Culture Self Assessment Teams.

In regards to qualifications for Assessment team members the CNWC suggest that there are many qualified Health and Safety Professionals and Union Representatives in the workplaces of Licensees that can conduct assessments. Union appointed safety representatives receive mandated training as well as many unions provide additional training in health and safety subjects so these representatives are well equipped to conduct safety assessments.

If you require any further information or clarifications please feel free to contact me. We look forward to having further dialogue in this regard.

Yours truly



David J Shier
President