



POWER WORKERS' UNION

February 8, 2013

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

Power Workers Union (PWU) Comments
Re: DIS 12 – 07, Safety Culture Submissions

Dear Mr. Dallaire:

The PWU represents the workers at OPG's Darlington & Pickering NPPs, Bruce Power NPPs, & the Operator Unit at AECL Chalk River Laboratories. The employees represented by the PWU all of Ontario's NPP work in all facets of the facility, including operations, administration, maintenance, security, projects and modifications, and first line supervisors. PWU members represent the "front line" of the day-to-day operations of these facilities. Our members at AECL consist of 150 Operating Staff.

As we have stressed in many CNSC Hearings we are fully supportive of a strong safety culture. The PWU is fully engaged with employers at the NPPs in Ontario.

We have reviewed the submissions submitted by the licensees and others that have been submitted in regards to DIS12-07, Safety Culture for Nuclear Licensees and wish to comment on the following areas:

- **Definition of Safety Culture**
- **Self Assessment**
- **Qualifications and make-up of assessment teams**

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Definition of Safety Culture

Many of the submissions commented on the definition. There appears to be many variations of what safety culture actually is. The PWU suggest that Safety Culture is **where a workplace is a safe place to work; where health & safety of workers, the public, and the environment is priority one; and where all of the workplace parties are fully engaged in workplace health & safety.**

The PWU suggest that the CNSC structure a tripartite team consisting of CNSC, Licensees, & Union representatives to flush out and reach consensus on a definition of Safety Culture.

Assessment Teams

Many of the licensees raised issues in this regard.

The PWU suggests that the idea of self assessment will create skepticism with nuclear power opponents. Therefore these assessments will have to be structured to ensure that their findings will have credibility with workers and the public.

The PWU is supportive of self assessment as long as the Unions are involved on the assessment team. This concept was also supported by the submission from the Society of Energy Professionals (SEP).

In the early 2000's the PWU & SEP were involved with Safe Workplace Assessment Teams (SWAT) at OPG. The intent was to carry out a general workplace safety assessment with a fresh set of eyes. The assessment team consisted of staff from within the Company but external to the specific site. This assessment process was deemed a self assessment within the Company and the team consisted of management representatives and Union representatives.

The workplace unions again must be involved in developing the assessment methodology.

The PWU also strongly suggest that the CNSC continue to perform external safety culture assessments from time to time and to continue with including workplace safety performance in their annual report on the safety of Canada's NPPs.

Qualifications and make up of Assessment Teams

Again several of the licensees raised this area as an issue.

The PWU as above strongly suggest that Union appointed representative have to be included on the self assessment team to provide expertise and credibility.

In regards to qualification of team members: there are many qualified staff including union representatives in the workplaces that will be very capable to complete assessments.

Additional information

Attached, as Appendix A is a document which describes the PWU interactions in regards to Workplace Health & Safety with OPG & Bruce Power Inc.

In conclusion the PWU is supportive of the development of a CNSC Safety Culture Regulation which includes all of the workplace parties.

If you require further information or clarification on our comments please feel free to contact me.

Sincerely

A handwritten signature in black ink, appearing to read 'R. Walker', with a stylized flourish at the end.

Robert Walker
PWU Vice President - Nuclear

Appendix One

Power Workers Union (PWU) Health and Safety Interaction with Ontario Power Generation (OPG) & Bruce Power Inc

The health and safety structure that the PWU has in place with, OPG, & Bruce Power Inc is the most expansive and inclusive framework to be found in any industry. The main features of the framework are explained below:

Local Joint Health & Safety Committee (“JHSC”)

The JHSC is the centerpiece of the health and safety infrastructure. It is a committee mandated by law on which the PWU appoints half of the members. The PWU representatives are assisted by the local PWU leadership as well as PWU Staff.

The following additional health and safety committees have been agreed to by the PWU, OPG & Bruce Power, through collective bargaining:

1. Joint Policy Committee on Health and Safety

Members on these committees consist of the leadership from the Unions, OPG & Bruce Power. The committee’s roles include:

- developing joint policies and agreements on health and safety issues;
- establishing working committees and task groups to address priority issues; and
- Identifying, evaluating and making recommendations on key health and safety problems/issues, both existing and emerging.

2. Joint Health and Safety Working Committee

These committees consist of representatives from the Company's Corporate Safety Department, two PWU Representatives and two representatives from the Society of Energy Professionals. The role of these committees' is to:

- carry out the work programs as per the joint Policy Committee; and
- Function as a resource for the local JHSC.

3. Joint Committee on Radiation Protection

These Committees are enshrined in the PWU Collective Agreements with OPG & Bruce Power. Their purpose is to review radiation protection performance and to provide recommendations to the station general manager with respect to employee and public safety in relation to the radiation safety program.