



File/dossier : 6.02.04

Date : 2018-10-09

Edocs pdf : 5653089

**Written submission from
the Power Workers' Union**

**Mémoire du
Syndicat des travailleurs et travailleuses
du secteur énergétique**

In the Matter of

À l'égard de

**Regulatory Oversight Report for Canadian
Nuclear Power Generating Sites: 2017**

**Rapport de surveillance réglementaire des
sites de centrales nucléaires au Canada : 2017**

Commission Meeting

Réunion de la Commission

November 8, 2018

Le 8 novembre 2018

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October 09, 2018

Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
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Ms. Levert:

Submission to the Canadian Nuclear Safety Commission (CNSC)

**RE: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites:
2017 (CMD: 18-M39)**

The Power Workers' Union (PWU) represents Workers at the Ontario Power Generation (OPG) Pickering, OPG Darlington, Bruce Power A and Bruce Power B Nuclear Power Plants (NPPs) as well as the Darlington, Pickering and Western Waste Management Facilities (WMFs). PWU Members work in a number of disciplines throughout these facilities including operations, maintenance, security, radiation protection, emergency response, technical support, inspections, planning, projects and modifications, administration and first line supervision.

The PWU fully supports the findings of CNSC Staff in their 2017 Regulatory Oversight Report and their conclusion that Canada's NPPs and adjacent WMFs operated safely in 2017.

The PWU has been an intervenor in a number of CNSC license hearings including the recent rounds. As stated in previous submissions to the CNSC, the PWU is committed to a leadership role in Health and Safety. This includes safety culture, radiological safety, conventional safety, environmental safety, public safety, nuclear safety and security. We take a collaborative approach to health and safety and participate in a number of joint forums to help facilitate this such as: Joint Health and Safety Committees (JHSCs), Joint Health and Safety Working Committees, Joint Policy Committees, Joint Committees on Radiation Protection and ALARA Committees. We have negotiated the unilateral right of certified JHSC Members to shutdown unsafe work, additional training for JHSC Members and Union involvement in incident investigations. We encourage our Members to use the internal responsibility system to jointly address health and safety concerns. We promote the reporting of all potential issues, joint investigations and learning from experience across the industry. The NPPs and WMFs we work in continue to experience

great Health and Safety records but we will always strive for improvement. We work closely with our employers to ensure these plants continue to operate safely.

We note that all NPPs and adjacent WMFs operated safely during 2017 and continued to receive a rating of Satisfactory or better in all Safety and Control Areas (SCA).

We would like to thank the CNSC Staff for their continuing oversight of Canada's NPPs and WMFs and for another very thorough report. This oversight is beneficial for the people who work in Canada's Nuclear Industry and for the Public. We commend the CNSC for producing this annual report. This report and the public process help ensure Canada's Nuclear Power Plants continue to operate safely. With longer license periods the annual report and public meeting become even more important for public engagement.

Thank you for the opportunity to comment. If you require additional information from the PWU please contact us.

Respectfully submitted by,

Robert L. Walker

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