



File / dossier : 6.01.07

Date: 2020-01-24

Edocs: 6107426

Oral Presentation

Exposé oral

Written submission from the Canadian Nuclear Workers' Council

Mémoire du Conseil canadien des travailleurs du nucléaire

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

*This page was intentionally
left blank*

*Cette page a été intentionnellement
laissée en blanc*



CANADIAN
NUCLEAR
WORKERS' COUNCIL

Canadian Nuclear Workers' Council

244 Eglinton Ave E, Toronto, ON, M4P 1K2 Canada Tel: 416-804-5542 | cnwc-cctn.ca

January 23, 2020

Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Members of the Canadian Nuclear Safety Commission

RE: BWXT Nuclear Energy Canada Inc. (BWXT) – Application for the renewal of the fuel facility operating licence for the Toronto and Peterborough facilities, FFOL-3620.01/2020

The Canadian Nuclear Workers' Council would like to make a submission in regards to BWXT's application to renew the Class 1B Fuel Facility Operating Licence at its Toronto and Peterborough facilities, FFOL-3620.01/2020. Please accept this letter as our written submission. We would also like to make an oral submission at one of the Public Hearing dates in Peterborough, March 4/5, 2020.

Who we are

The Canadian Nuclear Workers' Council (CNWC) is an organization that is comprised of Unions that represent Workers throughout Canada's Nuclear Industry. This includes uranium mining, nuclear fuel processing, electricity generation, nuclear power plant construction and refurbishment, medical isotope production, nuclear research and development. The CNWC has served as the collective voice of Unions across Canada's Nuclear Industry for 27 years.

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, and
- enhance public knowledge about the many benefits of Canada's Nuclear Industry.

More information about the CNWC can be found on our website www.cnwc-cctn.ca.

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*

For the CNWC and all of our Member Unions the Health and Safety of our Members is paramount. Worker Safety, Public Safety and the Protection of our Environment are all intricately linked. When our workplaces are safe the environment is safer and our communities are safer. We live, work and play in these communities along with our friends and families. Nothing is more important to us than protecting our health, safety and environment.

The CNWC is a regular intervenor at CNSC Licence hearings and CNSC Regulatory Oversight Reports and regularly comments on the evolution of CNSC Regulatory Documents.

The CNWC Board has meetings quarterly and Union representatives from our various workplaces get together for a conference annually. The conferences are held at a different location each year in proximity to one of our workplaces. We use these opportunities to learn more about the scope of Canada's Nuclear Industry, hear more about current issues, network and learn from our experiences.

In 2018 the CNWC Conference was held in Peterborough, Ontario. Conference Attendees were given a tour of BWXT's Peterborough Facility. The tour was very impressive. Employees were clearly engaged and proud of their workplace. High standards of workplace health and safety were very apparent.

In January, 2020 the CNWC National Director was given a tour of BWXT's Toronto Facility which included the opportunity to talk with people throughout the tour. High standards of workplace health and safety were clearly important to everyone.

The Unions at BWXT NEC

The CNWC Member Unions at the BWXT Facilities are:

- Toronto Facility; Unifor Local 252
- Peterborough Facility; Unifor Local 524 and Local 599-O, International Federation of Professional and Technical Engineers (IFPTE) Local 164

Unifor Locals 524 and 599-O and IFPTE Local 164 have provided letters that are attached at the end of this written submission.

Unifor and IFPTE work together with BWXT to foster a healthy safety culture. There are a number of joint committees in place that help promote dialogue, resolve issues and investigate incidents. The role of these committees are described in BWXT's application.

- *Health and Safety Policy Committee*
- *Workplace Safety Committee (WSC)*
- *As Low as Reasonably Achievable (ALARA) Committee*
- *Beryllium Safety Committee (Peterborough site)*

- *Ergonomics Committee*

As noted in the attached letters these committees are active and effective.

Many employees at both the Toronto and Peterborough Facilities have worked there for many years. These are good jobs and people generally don't leave for other employment opportunities.

BWXT NEC

BWXT NEC operates a Class 1B nuclear facility in Toronto and another in Peterborough. The Toronto facility manufactures natural UO₂ pellets. These pellets are sent to the Peterborough facility where the fuel bundles are manufactured. BWXT also operates a fuel services business at the Peterborough facility. These facilities have been operating safely in Toronto and Peterborough since 1965. The current licence, FFOL-3620.01/2020, was granted to GE Hitachi Nuclear Energy Canada in December 2010 for a 10-year term, expiring on December 31, 2020. That licence was transferred to BWXT in December 2016. The CNWC intervened in previous licence hearings. BWXT has continuously demonstrated their ability to protect the environment and the health and safety of people. BWXT's performance throughout the current license period demonstrates their ability to safely carry out the activities allowed under the license.

CNSC Staff report annually on the performance of Canada's Nuclear Industry with their Regulatory Oversight Reports. For BWXT this is found in the 'Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada'. The most recent report was for 2018 and the subject of a public meeting in December 2019. The CNWC made a written submission on that report and concurred with CNSC Staff's findings. All SCAs were Satisfactory. We would like to note here that we strongly support the public process for the CNSC's annual regulatory oversight reports.

We have read BWXT's application to renew FFOL-3620.01/2020, CMD 20-H2.1 and are in full support of the application.

CNSC Staff

We have reviewed the CNSC Staff response to BWXT's application, CMD 20-H2. We are in full support of CNSC Staff's response and their overall conclusions and recommendations.

Concluding Remarks

Canada's Nuclear Industry is Canadian innovation in action. The industry was developed in Canada and will continue to support research and development, evolve and provide opportunities for future generations. Today it is a vital segment of Canada's economy. The

industry provides clean, reliable, affordable baseload generation in Ontario and New Brunswick helping to lead the fight against climate change. It produces nuclear isotopes vital for our healthcare. The Industry is highly unionized and supports high quality employment for tens of thousands of Canadians. The workplace health and safety standards in Canada's Nuclear Industry are second to none. Employers in the Industry learn from each other's operating experience. BWXT Nuclear Energy Canada is a vital part of this Industry.

The BWXT Facilities in Toronto and Peterborough have been operating safely since 1965. During the term of their current licence they have operated safely and met all of their commitments. In the 2018 regulatory oversight report all SCAs were rated Satisfactory. Unifor, IFPTE and BWXT work together to ensure high standards of workplace health and safety.

We would like to take this opportunity to thank the CNSC, CNSC Staff and all Intervenors in this public hearing. The public CNSC Licence hearings, the presentation of CNSC Staff's annual regulatory oversight reports at public meetings and the continuous oversight of the CNSC and CNSC Staff all serve to make our workplaces and communities safe. Thank-you.

The CNWC, Unifor and IFPTE are in full support of BWXT's application.

If any Members of the Commission have questions for us we will be pleased to respond.

Bob Walker
National Director
Canadian Nuclear Workers' Council



January 21, 2020

Ref: CMD: 20-H2

Tribunal Members:

Unifor is Canada's largest private sector union, with more than 315,000 members across the country, working in every major sector of the Canadian economy. It was founded in 2013 as a merger of the Canadian Auto Workers and the Communications, Energy and Paperworkers Unions. In Peterborough, BWXT Nuclear Energy Canada (BWXT NEC) employs 92 members of Unifor between Locals 524 and 599-O.

Our diverse membership includes licensed tradespeople such as, millwrights, machinists, tool and die makers, welders, mechanics, electricians, as well as clerical staff, production operators and quality assurance technicians, some of whom are certified through government organizations. On occasion, some of our members are deployed to customer sites or nuclear power plants to assist with the installation, inspection and maintenance of the goods that we produce.

BWXT NEC is engaged with our members in many aspects of environmental, health and safety (EHS), therefore we are involved in the Ergonomics, Policy, Beryllium Safety, As Low as Reasonably Achievable (ALARA) and Workplace Health and Safety committees that meet regularly. In addition, unionized members hold eight of thirteen positions on the Emergency Response Team (ERT), and every three years, BWXT NEC allows any employee the option of taking an Emergency First Aid course. Prior to commencing a new job or task, specific safety and awareness training is mandatory, and if required, personal protective equipment will be supplied by the Company. Furthermore, depending on the area the employee is stationed in, ongoing medical surveillance may be required. We participate in scheduled and unscheduled audits of our processes and procedures by our customers, The Canadian Nuclear Safety Commission (CNSC) and the International Atomic Energy Agency (IAEA).

Through the Progressive Aboriginal Relations (PAR) committee, which includes union and company representation, we have reached out to our local Indigenous communities and are fostering healthy relations through sustained dialogue, volunteering, job fairs and shop floor tours. PAR is a program by the Canadian Council for Aboriginal Business (CCAB) that supports progressive improvement in Aboriginal relations, and a certification program that confirms corporate performance in Aboriginal relations at three levels. We continue to complete each step in the program, following their guidance, and are getting closer to achieving the first certification level of bronze.

Overall, Unifor has a good relationship with BWXT NEC; however, we have a responsibility of holding the Company accountable, if necessary. Many of us live in this community, or have friends and family who do; therefore, we have a stake in this as well. Most of our members spend their careers at BWXT NEC and retire with over 30 years of service, which can only be accomplished by a sense of satisfaction through shared wellbeing, culture and values.

BWXT NEC has committed to continue its safe operation in Peterborough, therefore, Unifor Local 524 and Local 599-O support the application for renewal of BWXT NEC's ten-year operating licence, and we would ask you to do the same.

Regards,



Tabitha Mocon
President, Local 599-O
205-294 Rink Street
Peterborough, ON
K9J 2K2



Hilda Blanchard
President, Local 524
203 Park Street North
Peterborough, ON
K9J 3P7



INTERNATIONAL FEDERATION OF
**PROFESSIONAL and
TECHNICAL ENGINEERS**

(LOCAL No. 164)

***Representing Professionals in Power Generation
Gas & Steam Turbines, Boilers, Transformers, Electric Motors and Nuclear Equipment.***

January 21, 2020

Ref: CMD: 20-H2

Members of the Canadian Nuclear Safety Commission:

The International Federation of Professional and Technical Engineers (IFPTE) is a diverse labour union advocating on behalf of more than 80,000 women and men in professional, technical, administrative and associated occupations in the United States and Canada.

Peterborough is home to Local 164 with 24 members, 16 of which who work at BWXT Nuclear Energy Canada Inc. (NEC). The membership is comprised of skilled draftsmen/woman and technical illustrators who support BWXT NEC's nuclear engineering services for customers such as OPG, Bruce Power, and New Brunswick Power. This support includes conducting customer site walk downs, creating detailed electrical and mechanical drawings, and creating maintenance and installation manuals to ensure safe operation of our products.

For our members, safety is a top priority, and IFPTE believes that BWXT NEC makes all efforts to ensure that our members work in a safe environment. Our membership has a seat on BWXT NEC's Workplace Safety Committee, Ergonomics Committee, Health and Safety Policy Committee, and the Emergency Response Team. We appreciate that BWXT NEC allows our Union to have an active voice in not only worker health and safety, but also in committees that ensure environmental and public safety.

BWXT NEC supplies our members with all required personal protective equipment, requires members to complete annual health and safety training, offer emergency first aid training, and enforces stringent workplace procedures.

Most of our members and their families live in the Peterborough community and rely on the opportunities that BWXT NEC provides. We strongly support BWXT NEC's application for renewal of its 10-year operating license.

Regards,



Kirk Billings
Vice-President, Local 164
1160 Monaghan Road
Peterborough, Ontario, K9J 0A8, Canada

International Federation of Professional and Technical Engineers, AFL-CIO & CLC
IFPTE.CA and IFPTE.ORG

Supplemental Information

Job Classifications of UNIFOR Local 252 Members at BWXT Toronto

40 Members:

- 6 Trades
 - 2 Electricians
 - 4 Mechanics
- 2 Q.A.
- 32 Operators