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**Written submission from the
Labourers' International Union of
North America (LIUNA)**

**Mémoire de l'Union internationale
des journaliers d'Amérique du Nord
(UIJAN)**

In the Matter of the

À l'égard de

**Canadian Nuclear Laboratories,
Douglas Point Waste Facility**

**Les Laboratoires Nucléaires Canadiens,
installation de gestion des déchets de
Douglas Point**

Application to amend the waste facility
decommissioning licence for the Douglas
Point Waste Facility

Demande de modification du permis de
déclassement de l'installation de gestion des
déchets de Douglas Point

Commission Public Hearing

Audience publique de la Commission

November 25-26, 2020

25 et 26 novembre 2020

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LIUNA!

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TERRY O'SULLIVAN
General President

October 19, 2020

ARMAND E. SABITONI
General Secretary-Treasurer

Canadian Nuclear Safety Commission (CNSC)
280 Slater Street.
P.O. Box 1046
Ottawa, ON K1P 5S9

Vice Presidents:

TERRENCE M. HEALY

Dear Sirs/Madams:

RAYMOND M. POCINO

JOSEPH S. MANCINELLI

I am writing on behalf of the Labourers' International Union of North America (LiUNA) in support of the recommendation to the Canadian Nuclear Safety Commission (CNSC) to approve the Canadian Nuclear Laboratories Limited (CNL)'s submission. The submission is for the amendment of the Douglas Point Waste Facility (DPWF) Decommissioning Licence to proceed with Phase 3 Decommissioning involving dismantling and demolition of all remaining facilities of the DPWF.

ROCCO DAVIS

*Special Assistant to the
General President*

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SAMUEL STATEN, JR.

PAUL V. HOGROGIAN

LiUNA strongly agrees that decommissioning Douglas Point will help minimize and consolidate Canada's nuclear waste liabilities and reduce risk while protecting the environment, which remains a primary objective including the safety and security of the public, LiUNA members and all workers on site.

THEODORE T. GREEN

General Counsel

Located on the Bruce Power site in the County of Bruce in the Province of Ontario, thousands of LiUNA Members are hard at work in the nuclear space, making critical improvements throughout the industry and to our environment. LiUNA has a strong working relationship with Bruce Power, who shares our objectives, first and foremost being worker safety. Our first-hand knowledge of how they conduct business on site, we know first-hand that the company's core value of "Safety First" goes far beyond the property line to ensure the safety of the environment and public in the surrounding areas.

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The application's approval will provide more certainty and stability as it enters into the next phase of decommissioning which involves the removal of remaining in stages. They will begin with the non-nuclear, administrative and turbine building, from there moving on to the radioactive buildings, the support building and ultimately the reactor building.

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Feel the Power



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LiUNA supports the objective of the Canadian Nuclear Laboratories Limited to work with community and industry to safely dismantle and demo all remaining facilities of the DPWF. We proudly support the leadership of CNL in ensuring that safe operational practices and procedures extend to all CNL employees and LiUNA members working at the site, as well as contractors, visitors, members of the public and the environment.

Chartered in 1903, The Labourers' International Union of North America (LiUNA) has been at the forefront of defending the rights of working men and women who build critical infrastructure across our country. One of the foundational pillars of our economy, LiUNA proudly represents over 130,000 diverse, highly-skilled members who continue to build stronger, inclusive communities across Canada.

LiUNA is one of most progressive and fastest growing union of construction workers and one of the most diverse and effective unions representing various sectors across North America healthcare and industrial. United through collective bargaining agreements LiUNA ensures members earn competing wages, good benefits and the opportunity for advancement and better lives for the member and their families.

It is understood that in phase 3 public and Indigenous participation will be essential to the five-sub phase regulatory decisions. LiUNA is a strong proponent for community advancement through skills training within its Indigenous Relations Department. Our focus is on building trusting relationships through innovative training programs to build self-sustaining communities, stronger futures and a career in the trades, whilst respecting land, treaty rights and governance of the community. In 2007 LiUNA signed a statement of partnership with the Assembly of First Nations (AFN) led under the leadership of former National Chief Phil Fontaine. This was reaffirmed in 2017 in perpetuity with current AFN National Chief Perry Bellegarde. This partnership serves as a catalyst for increasing employment and career building opportunities for members of the community, obtaining skills training and pathway to a prosperous future.

The Labourers' International Union of North America, Local 1059, chartered in 1953 represents workers in the City of London, Middlesex, Elgin, Oxford, Huron, Perth and Bruce Counties. Working for more than 240 different employers, our over 4,000 members in this jurisdiction include 3,000 construction and 650 maintenance, light manufacturing and security employees.

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Working on behalf of LiUNA members, Local 1059 conducts the bargaining of collective agreements, provides health benefits to members and their families, pension coverage, organizes new employers and offers innovative training courses to further the skills of current and prospective members. This includes delivering the Hazardous Material Worker (253H) Curriculum, one of the only two LiUNA locals to hold Training Delivering Agent (TDA) status approved by the Ministry of Training, Colleges and Universities in the province of Ontario. This training is imperative to the safety of all LiUNA Members which remains our highest priority. This training is critical in the nuclear sector and utilizes various methods of delivery and hands-on practical exercises, under the supervision of a qualified trainer.

We know that the next phase will not happen overnight and that next steps in consultation are imperative to the demolition of the site. Since 1984 we have witnessed the shutdown and removal of fuel and reactor coolant drained in accordance with regulatory requirements, Since then the facility has been in a safe shutdown state referred to as the "storage with surveillance" phase of the decommissioning with the final phase to begin this year which will ultimately lead to the removal of the facility by 2070.

By approving this recommendation, it is increasing vast opportunities for long-term jobs for our members, while helping to minimize and consolidate Canada's nuclear waste liabilities and reduce risk while protecting the environment which will benefit the people of Ontario for decades.

I thank you for your time and consideration of this request and hope to learn of a positive outcome.

With kind regards, I remain

Sincerely,



Joseph S. Mancinelli
International Vice President
and Central & Eastern Canada
Regional Manager

cc: Jack Oliveira, Business Manager, LiUNA OPDC

cc: Brandon MacKinnon, Business Manager, LiUNA Local 1059