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

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

**Regulatory Oversight Report for
Canadian Nuclear Power Generating
Sites in Canada: 2019 and Update on
OPG's Refurbishment Project at the
Darlington Nuclear Generating
Station**

**Rapport de surveillance
réglementaire des sites de centrales
nucléaires au Canada : 2019 et mise
à jour du projet de réfection d'OPG
pour la centrale nucléaire de
Darlington**

Commission Meeting

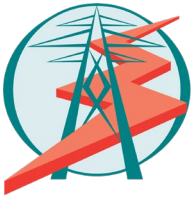
Réunion de la Commission

December 9, 2020

Le 9 décembre 2020

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**POWER
WORKERS'
UNION**

November 16, 2020

Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
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Members of the Canadian Nuclear Safety Commission

RE: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2019 and Darlington Refurbishment Update

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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 all disciplines throughout these facilities up to and including first line supervision. The PWU would like to make a submission in regards to CNSC Staff's annual Regulatory Oversight Report on Nuclear Power Generating Sites in Canada for 2019, Reference CMD 20-M24. Please include this letter for the December 8-10, 2020 meeting of the Commission.

The PWU fully supports the findings of CNSC Staff in their 2019 Regulatory Oversight Report for Canadian Nuclear Power Generating Sites and their conclusion that all of Canada's NPPs and the WMFs on their sites were operated safely in 2019 and made adequate provisions for the health, safety and security of workers, the public and the environment. CNSC Staff concluded that licensees complied with all applicable requirements and met expectations for all safety and control areas (SCAs). Their conclusion was based on compliance verification activities for each facility and supported by safety performance measures and other observations. Radiation doses were below the regulatory limits, no radiological releases to the environment exceeded regulatory limits and the frequency and severity of conventional safety incidents were low. We also note that OPG successfully completed the refurbishment of Darlington Unit 2 with the utmost attention to the safety of workers, the public and the environment.

The PWU is a regular intervenor in CNSC license hearings and public meetings. As stated in previous submissions to the CNSC, the PWU considers health and safety to be our highest priority. This includes safety culture, radiological safety, conventional safety, environmental safety, public safety, nuclear safety and security. With both Ontario Power Generation and Bruce Power 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 enhanced rights for certified JHSC Members, 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. Additionally, the PWU provides internal, Union-led training for JHSC Members and Chief Stewards on a variety of health and safety topics. Our Health and Safety indicators look great but we continuously strive for improvement. We work collaboratively with our employers to ensure these plants continue to operate safely. We coordinate our efforts with other Unions in the Nuclear Industry and we're active Members of the Canadian Nuclear Workers' Council (CNWC).

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 opportunity for public comment help ensure Canada's Nuclear Power Plants continue to operate safely. With longer license periods the annual ROR and public meetings have become even more important for public engagement.

Thank you for the opportunity to comment. If you require additional information from the Power Workers' Union please contact us.

Respectfully submitted by,

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

Jeff Parnell
President

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