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**Written submission from the  
Canadian Nuclear Workers'  
Council**

**Mémoire du  
Conseil canadien des  
travailleurs du nucléaire**

**Regulatory Oversight Report for  
Uranium and Nuclear Substance  
Processing Facilities in Canada: 2019**

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**Rapport de surveillance  
réglementaire des installations de  
traitement de l'uranium et des  
substances nucléaires au Canada :  
2019**

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Commission Meeting

Réunion de la Commission

December 8, 2020

Le 8 décembre 2020

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## Canadian Nuclear Workers' Council

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November 16, 2020

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

Members of the Canadian Nuclear Safety Commission

### **RE: Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2019**

The Canadian Nuclear Workers' Council (CNWC) would like to make a submission in regards to CNSC Staff's annual Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada for 2019, Reference CMD 20-M36. Please include this letter for the December 8-10, 2020 meeting of the Commission.

The CNWC has been the collective voice of Unionized Workers across Canada's Nuclear Industry for more than 27 years. Our Member Unions represent Workers in uranium mines and mills, nuclear fuel fabrication, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

Three CNWC Member Unions represent Workers at facilities covered by this report. Workers at Cameco Fuel Manufacturing in Port Hope and Cobourg and Cameco Corporation's Port Hope Conversion Facility are represented by the United Steel Workers (USW) and Workers at BWXT Nuclear Energy Canada in Toronto and Peterborough are represented by UNIFOR and the International Federation of Professional and Technical Engineers (IFPTE).

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.

For all CNWC Member Unions the Health and Safety of our Members is paramount. We work collaboratively with our employers to ensure this is always in mind. We believe that workplace health and safety, public safety and the protection of our environment are intricately linked. When our workplaces are safe it's better for the environment and safe workplaces result in safer

The Canadian Nuclear Workers' Council is comprised of Locals of the following organizations: District Labour Councils (Grey/Bruce, Durham, Northumberland, Lindsay and Saint John) \* International Association of Firefighters \* International Association of Machinists & Aerospace Workers \* International Brotherhood of Electrical Workers \* United Steel Workers \* Power Workers' Union \* Professional Institute of the Public Service of Canada \* Public Service Alliance of Canada \* Provincial Building and Construction Trades Council of Ontario (Ont. Building Trades) \* Society of United Professionals \* Society of Professional Engineers and Associates \* UNIFOR \* International Federation of Professional & Technical Engineers

communities. Nuclear Workers live, work and play in our nuclear host communities along with our friends and families. We take our responsibilities seriously. Nothing is more important.

The CNWC Board of Directors talk regularly and representatives from our Member Unions get together annually for conferences at different locations across our industry. We use our conferences as an opportunity learn more about Canada's Nuclear Industry, discuss current issues and learn from one another about our experiences. This has allowed us to tour the BWXT facility in Peterborough and the Cameco facilities in Port Hope and Cobourg.

The CNWC is a regular intervenor at CNSC public hearings and meetings. We comment on CNSC Regulatory Oversight Reports and comment on the evolution of CNSC Regulatory Documents.

The CNWC has reviewed the 2019 Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada. The CNWC is fully supportive of the findings of CNSC Staff and their conclusion that Uranium and Nuclear Substance Processing Facilities in Canada operated safely in 2019. This was based on CNSC Staff's compliance verification activities. We note that the ratings were "satisfactory" in all 14 SCAs for all facilities. This aligns with what we saw on our tours and what we heard from our Member Unions.

CNSC Staff confirmed that:

- radiation protection programs at all facilities were effective and adequately controlled radiation exposures, keeping doses ALARA
- environmental protection programs at all facilities were effective in protecting people and the environment
- conventional health and safety programs at all facilities continued to protect workers

CNSC staff concluded that, in 2019, Cameco and BWXT made adequate provision for the health and safety of workers, as well as for the protection of the public and the environment,

We would like to take this opportunity to thank the Commission, CNSC Staff and all Intervenors in this public meeting. The public hearings, public meetings and the continuous oversight of the CNSC and CNSC Staff all serve to make our workplaces and communities safer. Thank-you.

The CNWC is very supportive of the annual regulatory oversight reports. We would be pleased to participate in any future discussion on improving this process. If you have any questions for the CNWC please let us know.

Respectfully submitted,

Bob Walker  
National Director  
Canadian Nuclear Workers' Council