



**SUBMISSIONS OF THE
POWER WORKERS' UNION
TO THE CANADIAN NUCLEAR
SAFETY COMMISSION**

**REGARDING REGDOC-2.3.1: CONDUCT OF LICENSED ACTIVITIES:
CONSTRUCTION OF REACTOR FACILITIES**

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SUBMISSIONS OF THE POWER WORKERS' UNION

ON REGULATORY DOCUMENT 2.3.1: Conduct of Licensed Activities: Construction of Reactor Facilities

A. Overview

1. The Power Workers' Union ("PWU") has prepared these submissions in respect to the Regulatory Document 2.3.1: *Conduct of Licensed Activities: Construction of Reactor Facilities* (the "Draft Regulatory Document"), developed by the Canadian Nuclear Safety Commission (the "Commission") regarding the proposed requirements for the construction of reactor facilities.
2. The PWU supports the CNSC's initiative for a comprehensive framework for best practices and guidelines for the conduct of licensed activities in respect of the construction and commissioning of reactor facilities.

B. The PWU

3. The PWU is a trade union which represents over 15,000 workers employed in Ontario's power sector, most of whom are employed in the nuclear power industry. Its members work throughout Ontario and make up a large majority of employees in the nuclear power industry, including certified staff and other employees at Ontario's nuclear power plants, Darlington Nuclear Generating Station, Pickering Nuclear Generating Stations A and B, and Bruce Power Generating Stations A and B. PWU members also form the majority of workers employed at Ontario's other electrical generating facilities, as well as transmission and local distribution companies.
4. PWU members include employees of licensees who are involved in the construction, refurbishment and commissioning of new and existing reactor facilities. The PWU workforce is highly skilled and experienced in the operation, maintenance, construction and testing of reactor facilities. PWU members in operations and maintenance have worked under the oversight of licensees, particularly, Ontario Power Generation and Bruce Power, in new, refurbishing and re-starting projects, including the

installation and maintaining structures, systems and components, the preparation of training manuals, and the testing and commissioning of various components to design requirements. In the refurbishment of the Darlington facilities, PWU members will continue to be involved in the safe operation of the facilities during refurbishment and in the commissioning of the refurbishment. The PWU expects to be actively involved in future new and refurbishment construction projects.

5. As an external stakeholder who represents employees in nuclear reactors, the PWU has an important role to play in ensuring that construction management and commissioning planning is undertaken in a safe and efficient manner using an appropriate workforce.

C. The PWU's Position on the Regulatory Document

6. Overall, the PWU supports the CNSC's initiative for a comprehensive framework for best practices and guidelines for the construction and commissioning of reactor facilities. The PWU notes that much of the guidance contained in the Draft Regulatory Document and in its companion draft regulatory document, *Commissioning of Reactor Facilities*, represents the best practices that the PWU and its licensee employers have adopted in working in past and current projects on new and existing reactors.

7. The PWU supports the development of interface arrangements between various stakeholders and regulatory bodies in respect of construction projects. The PWU and its employers have existing communication pathways, as part of their long-standing collectively bargained relationships. The PWU supports the development of interfaces to resolve conflicts and concerns in the construction and pre-construction process, in addition to the labour relations processes which may be available to unionized workforces.

8. The PWU and its members are committed to the development and maintenance of a safety culture for construction and commissioning projects, and to the development of programs and safeguards that support a safe and efficient construction planning and implementation process.

9. The PWU notes that the Draft Regulatory Document contains subject matter that is not specific to the construction of reactor facilities and is dealt with in other CNSC documents. For example, the draft Regulatory Document references personnel qualification and training, an area dealt with in Regulatory Document 2.2.2: *Human Performance Management: Personnel Training*. The draft Regulatory Document requires personnel who will be involved in commissioning, operation, maintenance and technical support activities will receive “hands-on” training to gain expertise in their future discipline (p. 5). In the PWU’s view, the specific training for personnel who will be involved in commissioning, operation, maintenance and technical support activities is redundant to existing requirements and guidelines. Specific training may include hands-on training, but such requirements should be left to the licensee, to be implemented in accordance with existing licence requirements, CNSC guidelines, CSA N286-12: *Management system requirements for nuclear facilities*, and the licensee’s established programs, processes and procedures for qualification and training of personnel.

10. The PWU also supports the need to ensure that existing facilities be operated safely and securely during construction activities. As PWU members are front-line staff in both existing operations and construction projects, the PWU expects to work with licensee employers to develop an appropriate mechanism to ensure the continued safe operation of existing facilities.

11. The PWU supports the establishment of a construction program to ensure that planning and work is conducted in an efficient manner. The PWU views the draft Regulatory Document as providing guidance at a high level, with specific requirements, safety measures and construction processes to be handled by the licensee and its primary workforce and contractors and to be tailored to the unique construction requirements of the subject reactor facility.

12. In summary, the PWU supports the CNSC’s initiative to provide guidelines and requirements for the construction and commissioning of new and existing reactor facilities, subject to the comments above.

13. The PWU thanks the Commission for the opportunity to make submissions on this draft Regulatory Document.