

SUBMISSION TO THE  
CANADIAN NUCLEAR SAFETY COMMISSION

In the matter of

**AREVA RESOURCES CANADA INC'S APPLICATION FOR THE  
RENEWAL OF THE OPERATING LICENSE FOR THE McCLEAN  
LAKE URANIUM MINE and MILL OPERATION LOCATED IN  
NORTHERN SASKATCHEWAN**

Submitted by the

**CANADIAN NUCLEAR WORKERS COUNCIL**



And the

**COMMUNICATIONS, ENERGY, PAPERWORKERS UNION (CEP) Local 48S**



March 30, 2009

Members of the Commission:

The Canadian Nuclear Workers' Council (CNWC) and the Chemical, Energy, & Paper Workers Union (CEP) Local 48S wish to register their support for the renewal of the Operating License for Areva Canada Inc's McClean Lake Uranium Mine and Mill Operation in Saskatchewan.

The Canadian Nuclear Workers Council (CNWC) is a Council of Unions and Worker Organizations that have members working in the Canadian Nuclear Industry. Attached is a list of the council's member unions.

CEP Local 48S has represented the workers at the McClean Lake site since the mines inception in 1994.

Our comments and recommendations are based on the long working history with CEP local 48S and this company at its Cluff Lake mine (now decommissioned) in northern Saskatchewan and almost 14 years of experience at the McClean Lake project.

We have also reviewed Areva's submission as well as the CNSC Staff Submission for the AREVA application for the renewal of the operating license for the MaClean Lake Mine and Mill Facility. The following are our comments in this regard:

## **External View**

Several CNWC members toured this facility in 2007. A group of Saskatchewan and National Labour leaders/representatives also toured the site in 2006. Both groups were very impressed with the worker safety programs and the environmental controls that were in place to protect the environment. These tours provided the opportunity of external eyes to view the mine and mill site. This fact should help ensure the public that these facilities are operated in a safe manner and that the environment is safeguarded.

## **Worker Health and Safety**

A large contributing factor to the greatly improved safety record of the McClean Lake Site is due in large part to, the capable and experienced unionized work force.

CEP Local 48S places the safety of their members as its highest priority. The local union appoints members to the McLean Lake Occupational Health and Safety Committee. The committee consists of both union members and management representation. The union co-chair reports to the union president. They have been aggressive in incident and accident investigation, pursuing its recommendation and seeing them implemented. The committee meets monthly to address incoming and ongoing health and safety issues. The minutes of the meetings are posted.

Local 48S is a strong partner in promoting the 5-point safety card system. The worker inspects the work site eliminating or reporting any safety concerns before the task begins. This allows the worker to perform their task in a safe manner.

The McClean Mine site has implemented OHASAS 18001 Safety Management System which CEP local 48S fully supports as they view it as another tool to increase communication between union and management on safety issues. OHASAS 18001 will standardize the company's operations allowing them to identify risks and allocate resources for improvements.

With its membership and participation in Canadian Nuclear Workers Council and with other labour groups local 48S has been able to provide up-to-date information, and educate members on safety issues. A strong union presence ensures that those with the knowledge and those who are exposed to the risks have a voice in the health and safety conditions at their workplace. A strong union presence further ensures that those with the knowledge and those who are exposed to the risks have a voice in the health and safety conditions at their workplace

All of the above activities have contributed to a drastically improved safety culture at the site.

The CEP National Union constantly works to secure better legislation and regulation for safety in the industry.

## **Worker Radiological Safety**

New workers receive radiation safety training and other workers receive requalification training on a regular basis. It is suggested that the results of this training is that the worker dose rate is being reduced.

The ALARA principle has contributed to the reduction in worker dose at the facility.

## **Worker Training**

The amount of training has greatly increased in the past few years. The systematic approach to training (SAT) has also been introduced.

## **New Workers**

Many new workers have been hired. It is the goal of the CEP membership to continue to pass their work knowledge on to these new employees so they can benefit of their experience. This will ensure that the mine operation continues in a safe manner.

## **Labour Relations**

The parties have developed a good working relationship in regards to labour relations. This is not to say that **everything is perfect**. With a large workforce working at a remote site there are always bound to be workplace issues that occur and have to be dealt with by the Union and the Employer.

## **Union Involvement with External Agencies**

The union has established relationships of mutual cooperation with several regulatory bodies such as; the Saskatchewan Department of Labour, Mine Inspectors, and Boiler Inspectors. The union has helped them to introduce new standards.

## **Northern Workers**

In an area where there are few other employment opportunities, the continued operation of the McLean Lake project without interruption is an important and beneficial event for Areva's unionized employees, for northern contractors, suppliers and communities as well as for the Saskatchewan economy.

## **Environmental Issues**

We are naturally concerned about jobs. However, it must be pointed out that many of the CEP workers live in the northern communities and also have a great respect for the environment. These workers will definitely bring any environmental issues to the attention of their union and/or their employer. These workers are very familiar with the operation of the mines in Saskatchewan and are dedicated to operate them in an environmentally safe manner...

## **License Term**

As the Commission is aware the CNWC as well as our member unions have raised the issue of the length of the license period in many other hearings.

When our representatives speak to labour and public groups we always emphasize the fact that the nuclear industry is very highly regulated and very transparent. We explain that the regulator monitors the industry and that licensees receive licenses for a period of time and when they seek to have their facilities license renewed the regulator holds public hearings which ensure a transparent process. Over the years we have seen the bar go from a 2 year (or in some cases less) to a five year period for Nuclear Generating Stations. Some Waste Management Facilities other have received 10 year licenses. We have always voiced the concern that increasing the license period is wrong but have reluctantly agreed if a mid term review is conducted. Uranium Mining is part of the Nuclear

Industry. The nuclear debate in Canada and the world is in full swing. To continually increase the license term only raises more questions on transparency.

We do not support the 10 year license period. We recommend that the uranium mines be licensed for five years the same as the nuclear power plants and that they also be subject to a mid term review.

## **Day Two Hearing**

We will make an oral presentation at the hearing in Ottawa on April 30 th. At that time you will hear the views of two CEP member that has been employed in the mining industry for many years.

Thank you for the opportunity to make this presentation, we look forward to addressing any questions or comments Commission Members may have at the day two hearing in Ottawa.

Respectfully submitted:

Keith Higabottom, President  
CEP Local 48S

David Shier, President  
Canadian Nuclear Workers Council

APPENDIX A

**Membership of the  
Canadian Nuclear Workers' Council**

**Canadian Union of Public Employees  
Locals 1500 & 267**

**Communication, Energy & Paper Workers Union  
Local 599-O & Local 48 – S**

**International Association of Firefighters**

**International Association of Machinist & Aerospace Workers  
Local 608**

**International Brotherhood of Electrical Workers  
Local 79**

**Power Workers Union**

**Professional Institute of the Public Service of Canada (PIPS)**

**CRPEG & WRPEG**

**Public Service Alliance of Canada**

**United Steel Workers  
Locals 8914, 7806, 14193, 13713**

**Chalk River Technicians and Technologist Union**

**Allied Trades Council**

**Society of Professional Engineers Union**

**Hydro Quebec Professional Engineers Union**