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**Written Submission from
The Canadian Union of Skilled
Workers**

In the Matter of

Ontario Power Generation Inc.

Proposed Environmental Impact Statement
for OPG's Deep Geological Repository
(DGR) Project for Low and Intermediate
Level Waste

Joint Review Panel

September 16 to October 12, 2013

**Mémoire de
The Canadian Union of Skilled
Workers**

À l'égard de

Ontario Power Generation Inc.

Étude proposée pour l'énoncé des incidences
environnementales pour l'installation de
stockage de déchets radioactifs à faible et
moyenne activité dans des couches géologiques
profondes

Commission d'examen conjoint

16 septembre au 12 octobre 2013

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12 August 2013

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Joint Review Panel,

Re: DGR Joint Review Panel Hearing Written-only Submission

The Canadian Union of Skilled Workers (CUSW) would like to thank the Joint Review Panel for this opportunity to provide our support for OPG's Deep Geological Repository (DGR) Project for the long-term storage of low and intermediate-level waste at the secure Bruce nuclear site, within the Municipality of Kincardine. In the last four decades, this waste has been stored and managed safely at the Bruce site and we understand the obligation to future generations to further isolate this waste safely and permanently.

The Canadian Union of Skilled Workers (CUSW) is a national union, formed in 1999, to respond to the new and changing work methods in Canada. In Ontario, CUSW has approximately 2000 members, primarily working in the renewable power generation, transmission and distribution industry. CUSW supplies skilled workers to owners such as OPG, Bruce Power, Hydro One, Mississagi Power Trust and contractors like Areva, EMC Power Canada, Valard Construction, Transelec Common, Surespan Power, Langley Utilities and many other smaller sub-contractors. CUSW is a multi-skilled union which believes partnering with employers is the best approach to improve opportunities for the companies and their employees and resolve workplace problem, as they arise.

Of our 2000 members in Ontario – approximately 400, work at the Bruce site and live in the municipalities in Bruce County. As members of the community, CUSW appreciates:

- The safe design of the DGR, based on extensive research and international best-practice and, to safely and responsibly manage low and intermediate-level waste from OPG-owned nuclear generating stations in Ontario and isolate them from posing a threat to the public and the environment;

- The suitability of the Bruce site for the DGR Project, verified through the four-year program of studies, investigations and analyses;
- The rigorous multi-stage regulatory approval process to protect the environment and the public; and
- The transparent and robust community engagement program to inform and involve stakeholders and the public, especially those living and working in Bruce County.

We believe it is important to build the DGR facility at the Bruce nuclear site as:

- It is sensible to provide a permanent disposal solution to low and intermediate-level waste from OPG's nuclear generation stations where it already has been safely transported to, processed, stored and managed at the same site in the last 40 years.
- It is important to build the facility within the supportive communities of Bruce County. The DGR Project began in 2001 when Mayor Larry Kraemer, on behalf of and with full support of the Municipality of Kincardine, approached OPG to enter into preliminary discussions on the long-term management of this waste. Support from the communities and elected representatives of Bruce County have remained unchanged. Bruce County Warden David Inglis stated in 2012 that he believed "that it is the responsibility of our generation to provide this solution for the permanent disposal of nuclear waste."
- As Bruce County community members, CUSW workers, their families, friends and neighbours have confidence, knowledge and experience of living near and working in a nuclear facility and to welcome the DGR facility and to advocate its benefits.
- We have a highly skilled workforce, including CUSW members, that understands and embraces safety culture and practices the highest safety standards in our day-to-day work in the nuclear industry.
- We are familiar with and capable of supporting mega-projects such as the recent refurbishment of Units 1 and 2 at the Bruce Power nuclear generating station – a mega-project that employed over 2000 construction workers from the local area hiring halls.

In addition, CUSW believes that the DGR Project will bring many socio-economic benefits to the Province and to the immediate areas surrounding the Bruce nuclear site, without the adverse experience of the 'boom and bust' effects.

- CUSW has confidence in OPG's estimates of:
 - Total employment impact is approximately 25,000 full-time equivalent person-year.
 - Annual estimates of:
 - 80 to 200 jobs during the 6-year site preparation and construction stage;
 - 40 jobs for operation of the facility during its 40-year life span; and
 - 4 to 125 jobs for decommissioning of the DGR.
 - Estimated income of \$612M during the site preparation and construction and \$830M during the operation and decommissioning stage would be brought into the area.

- The DGR Project would be able to leverage the available local nuclear workforce, contractors and suppliers – Ontario's only resident casual workforce that is already trained to work in a nuclear facility and ready to engage in projects such as the DGR. The availability of this highly trained and skilled workforce in the area would translate to savings in training and relocation costs.

- In addition to job creation, there will likely be increased local and regional purchasing in the areas of construction materials, transportation and logistics, landscaping and maintenance, etc. There can also be expectations of improvements in infrastructure in the Bruce County area and increased municipality revenue through on and off-site development.

- There will likely be changes in demographics and population, as well as, increased demand for community and municipal services. However, studies show no sudden 'bust and boom' effects to Bruce County communities.

CUSW is ready to further support the DGR Project by means of:

- Continuous rigorous training program of Certified Nuclear Workers – a program that raises nuclear workers to the highest safety culture and ensures nuclear workers have the right and expected behaviours when working in a nuclear environment.

- CUSW is committed to continue investing in training nuclear workers, not only in radiation or nuclear safety, but also in different areas of expertise and specialized trades. This is CUSW's commitment to members and employers so that this highly skilled workforce would be available and capable to support multi-discipline mega-projects such as the DGR. Examples of these areas of expertise and specialized trades are:
 - Specialized Radiation Protection Assistant workers
 - Specialized trades in assessors, permit holders, Personal Protection Tag-out, welders, confined space co coordinators, high voltage maintainers, fiber certified, fire alarm certified, etc.
 - Tunnel and mining safety qualified workers
 - Construction of tunnel boring machine workers
 - Specialized nuclear technicians such as I&C, electrical, quality control, etc.

- CUSW is also committed to extend our membership recruitment into the diverse communities that surround our workplaces by continuing to support the work of our community partners.
 - To improve Aboriginal participation in the skilled trades, we continue to support the efforts of the Aboriginal Skills and Employment Training Strategy Agreement Holders and our participation on the Aboriginal Apprenticeship Board of Ontario. This has led to many examples of successful completion of apprenticeship training and certification in the skilled trades that are critical to the success of large and small construction projects.
 - We have also partnered with Skills for Change – an organisation that supports new Canadians to prepare for and maintain sustainable employment opportunities. The success of the Trades Win Support program have led to the successful transition of new Canadians to employment with our employer partners.
 - Included in both of these programs and our recruitment initiatives, is our outreach to women who might be interested in skilled trades employment opportunities in the energy industry.

Our value is to develop a world-class nuclear culture that gives the workers the skills, knowledge and experience to perform work at the highest level and in the safest manner in a continuous improvement process. We strive for our communities, industry and government to have faith that we work to the highest safety standard in the nuclear industry in the world.

We fully support this DGR Project to be built at the Bruce site. This project is important to us because our CUSW members live and work in in the Municipality of Kincardine and the neighbouring municipalities. Our members provide the skills to ensure that the work is done safely and at minimal impact to the environment and to their own families and communities.

Respectfully,

<original signed by>

Tom MacLean
Field Representative

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