



January 26, 2017

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario
Canada K1P 5S9

Power Workers' Union (PWU) Comments

RE: DRAFT REGDOC-2.1.2, Management System: Safety Culture

CANADIAN UNION
OF PUBLIC EMPLOYEES,
LOCAL 1000, C.L.C.

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The PWU represents the workers at OPG's Darlington & Pickering NPPs, Bruce Power's NPPs, and the Operators at Canadian Nuclear Laboratories - Chalk River. The employees represented by the PWU at Ontario's Nuclear Sites work in all facets of the facility including: operations, administration, maintenance, security, radiation protection, inspections, technical support and first line supervisors. PWU members represent the "front line" of the day-to-day operations of these facilities.

The PWU previously submitted comments on Discussion Paper DIS-12-07 Safety Culture for Nuclear Licensees. In that submission, as well as many other submissions to the CNSC, we stressed our full support for any initiatives that help promote a healthy safety culture. The PWU is fully engaged to this end with employers at the NPPs in Ontario.

The PWU is supportive of the Draft Regulatory Document however we would like to make a few comments on the following areas:

- Safety Culture
- Safety Culture Assessments

Safety Culture

The PWU sees a healthy Safety Culture as a workplace which is a safe place to work; where the health & safety of workers, the public, and the environment is an uncompromised priority; where safety and production are mutually dependent; and where all of the workplace parties collaborate and are fully engaged in fostering a healthy safety culture. All Workers need to be properly



trained and feel comfortable asking questions, raising concerns and reporting events or errors including potential incidents. When errors do occur they need to be investigated as an opportunity to learn and improve without the need to assign blame. Investigations need to have the full participation of Workers or Worker Representatives.

Performance management and performance incentives should not be structured in a manner that may create an incentive to not report incidents/events.

Safety Culture Assessments

Assessments are best conducted in a manner that ensures their findings will have credibility with workers and the public and which draws upon all available expertise in the area, including that provided by workers and their representatives who have been intimately involved in the maintenance and improvement of health and safety at nuclear facilities from their inception. In this regard, it is important to note that the PWU and Ontario Hydro established an internal responsibility system to improve safety in Ontario Hydro's generating facilities before the Ontario Occupational Health and Safety Act was even enacted. Indeed the Ontario Hydro IRS became a model for the OHSA. The PWU and its members therefore have many decades of experience in improving safety in electrical generating facilities, including nuclear facilities.

The PWU is supportive of self-assessments as an added measure to existing systems in place to maintain and improve the safety culture in nuclear facilities, so long as Worker Representatives are full and equal Members of the assessment teams. The PWU has decades of experience in participating in both incident investigations and safety assessments, which are at least as critical and important to safety matters as a self-assessment would be. Union-appointed representatives have provided constructive input and expertise in those contexts and would do so in self-assessments, which would in part be an extension of the efforts to improve safety culture that are one purpose of incident investigations and safety assessments.

The PWU also submits that the CNSC should continue to perform external safety culture assessments from time to time and to continue including workplace safety performance in their annual report on the safety of Canada's NPPs. These activities on the part of the CNSC would remain a valuable component of maintaining and improving safety culture at nuclear facilities.

Additional information

Attached, as Appendix A is a document which describes the PWU interactions in regards to Workplace Health & Safety with OPG & Bruce Power Inc.

In conclusion, the PWU is supportive of the CNSC Draft Safety Culture Regulation REGDOC-2.1.2.

If you require further information or clarification on our comments please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Walker", written in a cursive style.

Robert Walker
Sector Vice President – Nuclear
Power Workers' Union

Appendix A

Power Workers' Union (PWU) Health and Safety Interaction with Ontario Power Generation (OPG) & Bruce Power Inc.

The health and safety structure that the PWU has in place with, OPG, & Bruce Power Inc. is the most expansive and inclusive framework to be found in any industry. The main features of the framework are explained below:

Local Joint Health & Safety Committee (JHSC)

The JHSC is the centerpiece of the health and safety infrastructure. It is a committee mandated by law on which the PWU appoints half of the members. The PWU representatives are assisted by the local PWU leadership as well as PWU Staff. The PWU has negotiated agreements with our employers to provide Certification training to all JHSC Members. In addition the PWU provides H&S Accreditation training to all JHSC Members and Chief Stewards

The following additional health and safety committees have been agreed to with OPG & Bruce Power, through collective bargaining:

Joint Policy Committee on Health and Safety

Members on these committees consist of the leadership from the Unions, OPG & Bruce Power. The committee's roles include:

- developing joint policies and agreements on health and safety issues;
- establishing working committees and task groups to address priority issues; and
- Identifying, evaluating and making recommendations on key health and safety problems/issues, both existing and emerging.

Joint Health and Safety Working Committee

These committees consist of representatives from the Company's Corporate Safety Department, PWU Representatives and representatives from the Society of Energy Professionals. The roles of these committees are to:

- carry out the work programs as per the Joint Policy Committee; and
- Function as a resource for the local JHSC.

Joint Committee on Radiation Protection

These Committees are enshrined in the PWU Collective Agreements with OPG & Bruce Power. Their purpose is to review radiation protection performance and to provide recommendations to the station general manager with respect to employee and public safety in relation to the radiation safety program.

Agreements on Incident Investigations and the Establishment of an Investigator Pool

The PWU has negotiated agreements with OPG on incident investigations including the use of trained investigators from our pool for the investigation of incidents that had a high reasonable potential for harm.