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### **Cameco Corporation's Comments on REGDOC 1.3.1, *Licence Application Guide: Uranium Mines and Mills***

Cameco Corporation (Cameco) is the licensee for four mining/milling licensed operations, Cigar Lake, McArthur River, Key Lake, and Rabbit Lake located in northern Saskatchewan. Cameco has reviewed and prepared the following comments on the draft REGDOC 1.3.1, *Licence Application Guide: Uranium Mines and Mills* (the REGDOC).

In general, there was inconsistent use of language throughout the REGDOC and references to materials, such as *REGDOC 2.3.2, Accident Management, Version 2*, which addresses risks at reactor facilities that are inapplicable at uranium mines and mills (UMMs). Further, some references introduce requirements that create confusion on whether new compliance verification criteria is being introduced. For example, a requirement for the environmental protection program to document the reporting process for the National Pollutant Release Inventory (NPRI), is not an obligation for current licensees. Cameco would suggest the REGDOC be revised to remove all terminology and requirements that are not applicable to UMMs. Additionally, several sections of the REGDOC would benefit from references to the specific provisions in legislation that the requirement comes from, as the REGDOC does not include all application/renewal requirements.

The following provides more specific examples of Cameco's suggestions to improve the clarity and consistency of the REGDOC.

#### **Inconsistent language between REGDOCs and reference materials**

Terminology and accuracy amongst REGDOCs, reference material and legislation should remain consistent. Cameco suggests the following revisions:

##### **Section 3.9.2**

The text notes an application should "propose licensed released limits and establish environmental action levels that are performed as per REGDOC 2.9.2". Language in this

paragraph and throughout the REGDOC should clarify that action levels are established and implemented in accordance with CSA N288.8, rather than REGDOC 2.9.2. As required by REGDOC 2.9.2, licensees establish proposed release limits that become licensed release limits once accepted by the CNSC.

### **Section 3.12**

The text in the third paragraph (access control) states that the application shall describe the measures to prevent unauthorized access, which “could include control of access to source storage areas, laboratories and designated radiation areas. This extends beyond the language in REGDOC 2.12.3, which refers to controlling “access to sealed sources”.

The text in the fourth paragraph (control of loss and illegal use of nuclear substances) should be revised to remain consistent with existing legislation and to prevent the introduction of new program requirements that do not align with the security risks at UMMs. Cameco suggests revising the language to be consistent with subsection 3(h) of the *General Nuclear Safety and Control Regulations* (GNSCR) and removing the last two bullets to read as follows:

The application shall describe the measures that will be taken, to prevent the loss or illegal use, possession or removal of nuclear substances and prescribed equipment to prevent the loss of materials (e.g., ore, yellowcake and tailings) and devices authorized by the licensee and their use, possession and use by an authorized individual. This information should be provided in the nuclear security program document (which constitutes protected information) and may include:

- Unauthorized removal of nuclear materials- substances and prescribed equipment from site by employees or contractors
- ~~Transfer of nuclear substances to facilities which do not have the required CNSC licence~~
- ~~Release of contaminated equipment and materials from the site~~

### **Section 3.13.1**

The REGDOC includes a “shall” statement that does not align with the “should” statement in REGDOC 2.13.1. Cameco suggests revising the third bullet in the list, which states “Note: Either before or concurrent with applying...the applicant ~~shall~~ should complete and submit...”.

### **Section 3.16**

This section uses wording that is inconsistent with “target audience” used in REGDOC 3.2.1. Cameco suggests revising the language in the last sentence of the first paragraph as follows: “The application should include consideration of which communications tools will be most effective for target audiences.” ~~key populations and should specifically describe how communications will be performed with Indigenous Nations and communities who hold rights related to the area in which the uranium and/or mill is found. Use of relevant Indigenous languages in communications is strongly recommended~~

The second paragraph should also be revised for consistency with REGDOC 3.2.1 to read as follows: “An application at any lifecycle stage should demonstrate that ongoing engagement with ~~appropriate parties~~ target audiences has been continued...”

Further, the last paragraph will create an additional burden and inconsistency among applicants by introducing the “best practice” of publicly posting full versions of materials submitted to the CNSC. This wording should be revised to align with REGDOC 3.2.1 and maintain consistency as follows: “Information related to the public information program and disclosure protocol of the licensee or applicant should be readily accessible to target audiences.”

### **Section 3.17**

The terminology should be revised to “Indigenous groups and communities” for consistency with REGDOC 3.2.2.

### **References to materials that are inapplicable or introduce new requirements**

Several of the referenced documents in the REGDOC are not compliance verification criteria for existing UMMs. To reduce confusion, Cameco suggests removing documents that do not apply to UMMs. In the alternative, the REGDOC should clearly indicate which documents do not apply. The following provides several examples but is not an exhaustive list:

### **Section 3.2.4**

References to minimum staff complements and REGDOCs 2.5.1 and 2.2.5 are not applicable and should be removed. The text should be updated to align with practices for UMMs.

### **Section 3.3.2**

The text in paragraph 4 notes “validation of control room equipment” and references REGDOC 2.5.1 (applicable to Class 1 nuclear facilities). REGDOC 3.6 uses “control room” terminology as being related to reactor operators and high security sites. The references should be removed, or clarification provided on what the term is intended to capture as it relates to UMMs.

### **Section 3.3.5 and 3.4.1**

The reference in section 3.3.5 to procedures covering “normal, abnormal, unplanned and emergency” conditions appears to be terminology from Regulatory Documents applicable to reactors. Additionally, section 3.4.1 references “credible accident and emergency conditions,” which does not align with the conditions previously outlined in 3.3.5. Cameco suggests defining and clarifying how these terms relate to UMMs along with aligning the conditions amongst sections, or the references should be removed.

### **Section 3.9.5 and 3.11.10**

Section 3.9.5 states an applicant “shall” develop administrative levels for certain contaminants or physical stressors, introducing a new requirement. Similarly, s. 3.11.10 requires identification of administrative levels. In accordance with REGDOC 2.9.2, the use of administrative levels is at the discretion of licensees and the language should be revised to maintain alignment.

### **Section 3.13.1**

The second bulleted list is inconsistent with REGDOC 2.13.1. Further, the third bullet adds additional responsibilities for samples that are not required by stating “implement measures to prevent damage to, or theft, loss or sabotage of samples collected pursuant to a safeguards

agreement or the illegal use, possession, or removal of such samples.” To align with REGDOC 2.13.1, the second bulleted list that follows “The safeguards program should cover the following provisions:” should be revised to read:

- Safeguards Equipment and Seals
- IAEA Access
- Nuclear Material Accountancy
- Provision of Information
- Retention of Records

### **Appendix A**

The text states that the table outlines each SCA, their specific areas and the reference materials that relate to an application for a uranium mine or mill. However, there are several documents listed in the table which have no application to uranium mines and mills, such as:

- REGDOC 2.4.4, Safety Analysis for Class 1B Nuclear Facilities
- REGDOC 2.3.2, Accident Management, Version 2
- REGDOC 2.2.4, Fitness For Duty-Managing Worker Fatigue
- REGDOC 2.12.1, High Security Facilities, Volume I and II
- REGDOC 1.2.1, Guidance on Deep Geological Repository Site Characterization
- CSA N288.1, Guidelines for modelling radionuclide environmental transport, fate, and exposure associated with the normal operation of nuclear facilities for operating performance and environmental protection.

### **References to the applicable legislation and section should be included**

To assist applicants with evaluating the completeness of applications, a reference to the legislation should be included. The information in sections 4.2 to 4.10 appear to be taken from the *Nuclear Safety and Control Act* and its accompanying regulations, the GNSCR and *Uranium Mines and Mills Regulations*. However, the sections are not inclusive of all requirements and the wording used is inconsistent with the language in the corresponding legislation.

For example, it should be noted in section 4.14 that the requirement to notify the CNSC comes from s.15(c) of the GNSCR and includes any change in the information contained in s.15(a) and (b) of the GNSCR.

Additionally, it is unclear where the bullet list of requirements at the end of section 3.6 originated. Clarification on whether this is from a specific guidance document or legislation with a reference included would be useful.

### **Revisions to language, redundancy, and typo errors**

There are many sections where the wording in the section is not consistent with the scope outlined in section 1.2 of the REGDOC. For example, the wording of “application to operate or decommission a facility” is used throughout the entire section 3.14. Cameco suggests revising

the wording to capture the entire scope for consistency, such as “prepare a licence application for a licence to prepare a site for and construct, operate, and/or decommission a proposed new uranium mine or mill, or for the renewal of a licence for an existing facility.”

Generally, there are some sections that could be combined/removed to reduce duplication such as:

- Remove section 4.1 as the information is already contained in s. 3.11.11.
- Section 4.13 and 4.11 could be combined for succinctness.
- Revise section 3.16 and 3.17 to avoid redundancy and potential contradiction.
- Section 3.11.3 is redundant as s. 3.11.1 notes the waste management program should include conventional and radioactive wastes.
- Sections 3.11.6 and 3.11.9 are redundant as s. 3.5 speaks to physical design and s. 3.11.1 references the corresponding REGDOCs.

Some of the typos that were identified are as follows:

- Section 3.11.5 refers to s. 4.4 and 4.5 which should be 3.4 and 3.5.
- Section 3.13.1 contains spelling errors in questionnaire and NSCA.
- Section 3.11.6 and 3.11.7 reference s. 4.16.3 which should be s. 3.5.4.

In summary, the REGDOC would benefit from a thorough review to remove terminology, requirements and reference materials that are not applicable to UMMs. Ensuring alignment with existing REGDOCs and referencing the applicable sections in legislation would improve the value of the REGDOC as a licence application guide.

If you have any questions with respect to the above, then please contact me at [liam\\_mooney@cameco.com](mailto:liam_mooney@cameco.com).

Sincerely,



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Vice President  
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