



**Written submission from  
Areva Resources Canada Inc.**

**Mémoire de  
Areva Resources Canada Inc.**

In the Matter of

À l'égard de

**Cluff Lake Project**

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**Établissement de Cluff Lake**

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Request by Areva Resources Canada Inc. for changes to the Cluff Lake Project Financial Guarantee and amendment to the Decommissioning Licence

Demande d'Areva Resources Canada Inc. pour des modifications à la garantie financière et au permis de déclassement du projet Cluff Lake

Public Hearing - Hearing in writing based on written submissions

Audience Publique - Audience fondée sur des mémoires

**June 2018**

**Juin 2018**





February 15, 2018

Marc Leblanc  
Commission Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street  
PO Box 1046, Station B  
Ottawa, Ontario K1P 5S9

Dear Mr. Leblanc:

**Orano Canada Inc.**

817 45<sup>th</sup> Street West  
Saskatoon SK S7L 5X2  
Tel.: +1 (306) 343-4500

**Re: Name Change of AREVA Resources Canada Inc. to Orano Canada Inc.; Request to Amend the following Licences:  
UMOL-MINEMILL-McCLEAN.00/2027  
UMDL-MINEMILL-CLUFF.00/2019  
(collectively the CNSC Licences)**

Our parent company, driven by a new strategic vision, is refocused on the nuclear fuel cycle. To support this new vision, the former “New AREVA group” has changed its brand identity and is now Orano Group. Accordingly, in keeping with our parent company, we are changing our name from AREVA Resources Canada Inc. to **Orano Canada Inc.** Please find enclosed copies of the Certificate of Amendment issued by Corporations Canada in this regards. There have been no other changes affecting Orano Canada Inc.

Pursuant to section 24 of the Nuclear Safety and Control Act, AREVA Resources Canada Inc. (now Orano Canada Inc.) is requesting to amend the following licences issued by the Canadian Nuclear Safety Commission to reflect the name change from AREVA Resources Canada Inc. to Orano Canada Inc.:

- UMOL-MINEMILL-McCLEAN.00/2027
- UMDL-MINEMILL-CLUFF.00/2019

Further pursuant to section 24 of the NSCA, we confirm that this name change is strictly an administrative change involving no matter of substance, therefore we maintain that we remain qualified to carry on the activities authorized by the licences and continue to make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national



security and measures required to implement international obligations to which Canada has agreed.

Lastly, we confirm that once the CNSC Licences are amended, we will take all steps necessary to ensure that other relevant documents, including our financial guarantees, surface leases, permits and other legal documents are amended and that our stakeholders are advised of the name change.

Should you have any questions, please contact myself at 306.343.4058 or Tina Searcy at 306.343.4525.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dale Huffman".

Dale Huffman  
Vice-President  
Health, Safety, Environment and Regulatory Relations

Enclosure: Certificate of Amendment

cc: M. Langdon (CNSC)  
S. Akhter (CNSC)  
J. Glover (CNSC)  
UMMD Distribution  
ARC Distribution



## Certificate of Amendment

*Canada Business Corporations Act*

## Certificat de modification

*Loi canadienne sur les sociétés par actions*

Orano Canada Inc.

Corporate name / Dénomination sociale

333436-8

Corporation number / Numéro de société

I HEREBY CERTIFY that the articles of the above-named corporation are amended under section 178 of the *Canada Business Corporations Act* as set out in the attached articles of amendment.

JE CERTIFIE que les statuts de la société susmentionnée sont modifiés aux termes de l'article 178 de la *Loi canadienne sur les sociétés par actions*, tel qu'il est indiqué dans les clauses modificatrices ci-jointes.

Virginie Ethier

Director / Directeur

2018-02-07

Date of amendment (YYYY-MM-DD)

Date de modification (AAAA-MM-JJ)



**Form 4**  
**Articles of Amendment**  
*Canada Business Corporations Act*  
*(CBCA) (s. 27 or 177)*

**Formulaire 4**  
**Clauses modificatrices**  
*Loi canadienne sur les sociétés par*  
*actions (LCSA) (art. 27 ou 177)*

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- 1 Corporate name  
Dénomination sociale  
**AREVA Resources Canada Inc.**
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- 2 Corporation number  
Numéro de la société  
**333436-8**
- 
- 3 The articles are amended as follows  
Les statuts sont modifiés de la façon suivante
- The corporation changes its name to:  
La dénomination sociale est modifiée pour :  
**Orano Canada Inc.**
- 
- 4 Declaration: I certify that I am a director or an officer of the corporation.  
Déclaration : J'atteste que je suis un administrateur ou un dirigeant de la société.

Original signed by / Original signé par  
**Tammy Van Lambalgen**  
\_\_\_\_\_  
**Tammy Van Lambalgen**  
**306-343-4569**

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de 5 000 \$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.



VIA EMAIL

November 20, 2017

Mr. Marc Leblanc  
Commission Secretary  
Canadian Nuclear Safety Commission  
280 Slater Street  
PO Box 1046, Station B  
Ottawa, ON K1P 5S9

Dear Mr. Leblanc:

**Re: Request to Approve the Revised Financial Assurance for the Cluff Lake Project,  
Licence Number UMDL-MINEMILL-CLUFF.00/2019**

AREVA Resources Canada Inc. ("AREVA") is writing to reactivate our July 2015 request (Van Lambalgen to Leblanc, July 15, 2015<sup>1</sup>) for CNSC approval of the revised financial assurance amount for the Cluff Lake Project. We understand that the processing of our original request was postponed to coincide with the midterm hearing for Cluff Lake that was then anticipated for mid-2016. A subsequent decision then integrated the Cluff Lake midterm report into the larger Regulatory Oversight Report and Commission meeting that took place in December 2016. Ensuring the costs associated with monitoring and maintaining our decommissioned site are optimized is essential and therefore reducing the financial assurance, and the associated cost of carrying that assurance, remains very important to AREVA.

The updated 2014 Detailed Decommissioning Plan ("DDP"), revisions to the cost estimate, and resulting financial guarantee were submitted to both the Canadian Nuclear Safety Commission (CNSC) and the Saskatchewan Ministry of the Environment (SMOE) on December 23, 2014 for review. The SMOE staff completed a review of the DDP and provided their letter of acceptance on the revised document on July 6, 2015<sup>2</sup>. The CNSC staff completed a review of the DDP and concluded the plan and cost estimate and reduced financial guarantee met the respective regulatory requirements on July 10, 2015<sup>3</sup>.

As stated in our July 15, 2015<sup>1</sup> correspondence, the Province of Saskatchewan has agreed to the reduced cost estimate of \$26.8 million that accurately reflects the remaining decommissioning work, environmental monitoring, and eventual transfer to the Province of Saskatchewan's Institutional Control Program. AREVA continues to maintain a financial guarantee based on the cost estimate to execute the activities described in the 2009 Detailed Decommissioning Plan (DDP) which includes

**AREVA Resources Canada Inc.**

P.O. Box 9204 – 817 - 45<sup>th</sup> Street West – Saskatoon, SK S7K 3X5 – CANADA  
Tel: 1 (306) 343-4500 – Fax: 1 (306) 653-3883 – Web Site: [www.avevaresources.ca](http://www.avevaresources.ca)

works that have subsequently been completed. The current financial assurance, remaining at the value approved by the CNSC in 2009, is outdated and overvalued at \$33.6 million.

Condition 1.4 of UMDL-MINEMILL-CLUFF.00/2019 states “The licensee shall maintain a financial guarantee for decommissioning acceptable to the Commission or a person authorized by the Commission”. Although we have some uncertainty as to the process to obtain CNSC approval, we are hopeful that this letter satisfies the requirement to reactivate the process to approve the revised financial assurance amount, enabling AREVA to subsequently revise the value of financial assurance held by the Province of Saskatchewan to C\$26.8M. Please advise on the next steps for the approval process.

If you require additional information, please contact me at (306) 343-4058 or by email at [dale.huffman@areva.com](mailto:dale.huffman@areva.com), or Diane Martens, our Cluff Lake Project Manager at (306) 343-4042 or by email at [diane.martens@areva.com](mailto:diane.martens@areva.com).

Sincerely,



Dale Huffman  
Vice President  
Health, Safety, Environment and Regulatory Affairs

cc: Robert Lojk, CNSC  
Mark Langdon, CNSC

Attachments:

References

1. AREVA Letter, T. Vanlanbalgen (AREVA) to M. Leblanc, Licence Amendment Request to Approve the Revised Financial Assurance for the Cluff Lake Project, Licence Number UMDL-MINEMILL-CLUFF.00/2019, July 15, 2015.
2. SMOE Letter, A. Merkowsky (SMOE) to D. Huffman (AREVA), Cluff Lake Project –Detailed Decommissioning and Reclamation Plan and Financial Assurance, July 6, 2015, File S25020-50/CL/06.
3. CNSC Letter, C. Moreau (CNSC) to D. Huffman (AREVA), Cluff Lake Project Detailed Decommissioning Plan, Version 3 Revision 0, July 10, 2015, File No 4.04.02 CL-A, E-Doc #480018.

DMH/lp





VIA COURIER

July 15, 2015

Mr. Marc Leblanc  
Commission Secretary  
Canadian Nuclear Safety Commission  
280 Slater St.  
P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

Dear Mr. Leblanc:

**Re: Licence Amendment Request to Approve the Revised Detailed Decommissioning Plan for the Uranium Mine Decommissioning Licence, Cluff Lake Project, Licence Number UMDL-MINEMILL-CLUFF.00/2019 (the “Cluff Lake Licence”)**

AREVA Resources Canada Inc. (“AREVA”) is writing to request to amend the Cluff Lake Licence to replace the current Detailed Decommissioning Plan (Version 2, February 2009) which is Appendix B Reference Document to the Cluff Lake Licence. In accordance with Licence Condition 2.1 of the Cluff Lake Licence this amendment requires the Canadian Nuclear Safety Commission’s approval. The Detailed Decommissioning Plan (Version 2, February 2009), will be replaced with the revised Detailed Decommissioning Plan (Version 3, December 2014), a copy of which is attached hereto (hereinafter the “DDP”).

The revisions in the DDP consider activities conducted in the period since 2009 when the current Cluff Lake Licence was issued. The revisions to the cost estimate for the remaining decommissioning work, environmental monitoring and eventual transfer to the Province of Saskatchewan’s Institutional Control Program has been reduced from C\$33.6 million to C\$26.8 million. AREVA maintains a financial guarantee acceptable to the Canadian Nuclear Safety Commission, based on the cost estimate to execute the activities described in the DDP. The updated DDP, revisions to the cost estimate and resulting financial guarantee were submitted to both the Canadian Nuclear Safety Commission – Uranium Mines and Mills Division (CNSC UMMD) and the Saskatchewan Ministry of Environment (SMOE) on December 23, 2014 for review. The SMOE staff completed a review of the DDP and provided their letter of acceptance on the revised document and financial guarantee on July 6, 2015<sup>1</sup>.

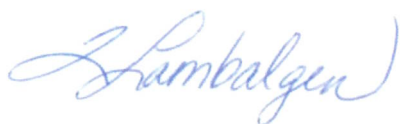
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<sup>1</sup> SMOE Letter, A. Merkowsky (SMOE) to D. Huffman (AREVA), *Cluff Lake Project-Detailed Decommissioning and Reclamation Plan & Financial Assurance*, July 6, 2015, File S25020-50/CL/06.

The CNSC Staff completed a review of the DDP and concluded the plan and cost estimate and reduced financial guarantee met the respective regulatory requirements on July 10, 2015<sup>2</sup>.

We trust that this letter satisfies the requirement to commence the process to request a Licence Amendment with the Canadian Nuclear Safety Commission. It is AREVA's understanding that this amendment request is administrative in nature and therefore may qualify for an Abridged Hearing if recommended by the CNSC staff pursuant to section 1.6 (3) CNSC GD-379, Guide for Applicants and Intervenor Writing CNSC Commission Member Documents (2012). We will await the Commission's determination on what is further required for the approval process. If you require additional information, please feel free to contact myself at (306) 343-4569 or by email at [tammy.vanlambalgen@areva.ca](mailto:tammy.vanlambalgen@areva.ca) or Lyne Thompson, Regulatory Coordinator at (306) 343-4007 or [lyne.thompson@areva.ca](mailto:lyne.thompson@areva.ca).

Sincerely,



Tammy Van Lambalgen  
Vice President, Regulatory, CSR & Legal

Enclosure

cc: Charles Moreau  
CNSC UMMD Records  
Alan Merkowsky, SMOE  
AREVA Distribution

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<sup>2</sup> CNSC Letter, C.Moreau (CNSC) to D. Huffman (AREVA), *Cluff lake Project Detailed Decommissioning Plan, Version 3 Revision 0*, July 10, 2015, File No 4.04.02 CL-A, E-Doc #4800418



**July 6, 2015**

Environmental Protection Branch  
Uranium and Northern Operations  
**Ministry File: S25020-50/CL/06**

Mr. D. Huffman  
Vice President – Safety, Health, Environment and Quality  
AREVA Resources Canada Inc.  
P.O. Box 9204  
817 – 45<sup>th</sup> Street West  
Saskatoon SK S7K 3X5

Dear Mr. Huffman:

**Re: Cluff Lake Project – Detailed Decommissioning and Reclamation Plan & Financial Assurance**

Ministry of Environment (Ministry) staff have completed their review of the following correspondence submitted by AREVA Resources Canada Incorporated (AREVA) regarding the proposal to amend the Approval to Operate a Pollutant Control Facility for the Cluff Lake Project site:

- Received on December 23, 2014, “Cluff Lake Project – Detailed Decommissioning Plan Version 3”.

It is noted by Ministry staff that a significant portion of the estimated costs are now related to the Environmental Monitoring Program (EMP) under the assumption that the decommissioning objectives are being met. Because of this, AREVA is suggesting that the EMP should be reduced in scope and cost. Ministry staff also understand that AREVA will be submitting a Hydrogeology and Groundwater Modelling Technical Information Document and the Environmental Performance Report Technical Information Document before year end.

Based on this review, the proposed Detailed Decommissioning Plan and Financial Assurance estimate of \$26.6 Million is acceptable with the understanding that the Ministry may require changes to the EMP following reviews of the submissions expected by year end.

If you have any questions, or require additional information, you may contact the undersigned at (306) 933-7062.

Sincerely,

  
Alan Merkowsky M.Sc.

Senior Environmental Project Officer – Uranium and Northern Operations  
Ministry of Environment

cc: L. Thompson/Cluff Regulatory – AREVA  
C. Moreau – Canadian Nuclear Safety Commission  
T. Moulding – Ministry of Environment (E-mail)/File



Directorate of Nuclear Cycle  
and Facilities Regulation

Telephone: 613-995-1947  
[charles.moreau@cnsccsn.gc.ca](mailto:charles.moreau@cnsccsn.gc.ca)

July 10, 2015

File No.: 4.04.02 CL-A  
E-Docs #4800418

Mr. Dale Huffman, Vice President  
Safety, Health, Environment & Quality  
AREVA Resources Canada Inc.  
817 – 45<sup>th</sup> Street West  
P.O. Box 9204  
Saskatoon, SK S7K 3X5

**Subject: Cluff Lake Project  
Detailed Decommissioning Plan, Version 3 Revision 0**

Dear Mr. Huffman:

Canadian Nuclear Safety Commission (CNSC) staff have reviewed the **Detailed Decommissioning Plan, Version 3 Revision 0** for the Cluff Lake Project dated December 23, 2014 (D. Huffman to J. Glover and A. Merkowsky). The decommissioning plan was evaluated against the criteria described in CSA N294: *Decommissioning of Facilities Containing Nuclear Substances* and Regulatory Guide G-219: *Decommissioning Planning for Licensed Activities*.

Based on the review and considering the current stage of decommissioning, CNSC staff conclude that Version 3 of the Detailed Decommissioning Plan meets the requirements of CSA N294 and Regulatory Guide G-219.

CNSC staff have also reviewed the updated financial guarantee cost estimate for the Cluff Lake Project. The assessment was evaluated in accordance with CNSC Regulatory Guide G-206: *Financial Guarantees for the Decommissioning of Licensed Activities*. The financial instrument meets the criteria of the CNSC Regulatory Guide G-206.

CNSC staff have no additional comments and is awaiting AREVA's request to include the new revision of the Detailed Decommissioning Plan in the Cluff Lake Project decommissioning licence.

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Should you have any questions or concerns, please do not hesitate to contact me at 613-995-1947.

Sincerely,



Charles Moreau  
Project Officer  
Uranium Mines and Mills Division

Enclosure

c.c.: L. Thompson, Cluff Regulatory Group – AREVA  
A. Merkowsky – Saskatchewan Ministry of Environment  
UMMD Records