



**Written submission from
Canada Eldor Inc.**

**Mémoire de
Canada Eldor Inc.**

In the Matter of the

À l'égard de

Beaverlodge Project

Site Beaverlodge

Application to amend the Waste Facility Operating Licence to allow for the removal of 20 properties at the Beaverlodge Project from its licence

Demande pour modifier le permis d'exploitation d'une installation de gestion des déchets pour permettre le retrait de 20 propriétés du site Beaverlodge de son permis

Commission Public Hearing

Audience publique de la Commission

October 2, 2019

Le 2 octobre 2019

*This page was intentionally
left blank*

*Cette page a été intentionnellement
laissée en blanc*

Canada Eldor Inc.

Intervention before the Canada Nuclear Safety Commission - Cameco Corporation's Application for Release of certain properties from the Waste Facility Operating Licence, Beaverlodge Mine Site

Canada Eldor Inc. (CEI) is a federal crown corporation, and an agent of Her Majesty in Right of Canada. CEI is filing this request to intervene with the Canadian Nuclear Safety Commission (CNSC) on the basis that it (i) has an interest in the proceedings because it continues to reimburse Cameco Corporation (Cameco) for costs related with the management of the decommissioned Beaverlodge Mine Site; and, (ii) CEI has special knowledge of the history of the Beaverlodge Mine Site.

CEI is the continuing corporation previously called Eldorado Nuclear Ltd. (Eldorado) Eldorado was Canada's sole source of uranium until the 1950's and continued to be an active mining and refining company until its assets were sold in 1988 to a newly formed company-Cameco- in exchange for a 38.5 % interest in Cameco's shares. These shares were subsequently sold and CEI has no current equity interest in Cameco.

As a part of asset sale to Cameco, Eldorado retained responsibility for the former Beaverlodge mines and mill, which had been shut down in 1982 and decommissioned under the supervision of the Atomic Energy Control Board. Since CEI ceased to have any operating personnel as a part of the subsequent 1988 sale to Cameco, it was agreed that Cameco would manage any matters pertaining to Beaverlodge, and that CEI would reimburse Cameco for its costs plus a management fee. This arrangement has continued since the 1988 transaction to the present.

A brief history of Beaverlodge.

The Beaverlodge uranium mines and mill were operated by Eldorado Mining and Refining Limited (later known as Eldorado Nuclear Inc.), a federal Crown corporation, from 1952 to 1982. Uranium-bearing minerals were first found in the Beaverlodge area in 1934. Since there was no demand for uranium at the time, prospecting and development of the ore was delayed for almost ten years until 1944 when Eldorado Mining and Refining Limited, and the Geological Survey of Canada commenced detailed exploration in the area of Fishhook Bay of Lake Athabasca.

The-primary focus of the exploration eventually moved to the area north and east of Beaverlodge Lake where the Ace, Fay, and Verna ore bodies were discovered. Three shafts (Ace, Fay and Verna) were sunk in this area in the late 1940s and early 1950s and production continued until 1982. Over the production period a number of satellite mines were also developed.

1240 Bay Street, Suite 302
Toronto, Ontario M5R 2A7
Telephone/téléphone: (416) 966-2221
FACSIMILE/-télécopieur: (416) 966-5485
Canada

Canada Eldor Inc.

The properties were decommissioned by 1985 following an AECB-approved decommissioning plan. The following extract from documents filed with the AECB at the time is of note:

"Departure with Dignity is an account of the decommissioning of a uranium mine/mill facility.

It is the history of the implementation of a plan developed over one and one-half years, and which took two years to implement in a sometimes harsh and difficult environment. It is the history of an innovative and dedicated group of people with deep concern for achieving high standards of safety and excellence, and for the environment in which they lived and would leave behind. Without such dedication, this account would never have been written.

The decommissioning of the Beaverlodge mine/mill facilities and reclamation of the site represents a first in Canada in which company and regulatory personnel developed, and the company successfully implemented, a plan of action of this size and complexity within the uranium industry in Canada.(emphasis added)

This report demonstrates that with sound objectives and careful planning, the orderly and successful decommissioning of a uranium mine and mill complex can be achieved. Although the complete eradication of the effects of the operations was neither intended nor achieved, their reduction to a very low, stable level was possible. The planning process and ingenuity of the decommissioning staff resulted in the project being completed on schedule and within budget.

The decommissioning and reclamation plan was developed in close consultation with the responsible Federal and Provincial regulatory agencies. The agencies formed a Joint Review Committee (JRC) which reviewed proposals and plans submitted by the company, issued joint approvals to conduct the work at the site, and ensured compliance with regulatory agency requirements.

The overall decommissioning and reclamation plan was developed after nearly two years of intensive study in which existing environmental conditions were characterized, operating impacts were defined, remedial options were identified and costed, and an environmental and radiological assessment of the potential decommissioning and reclamation options was completed.

1240 Bay Street, Suite 302

1240, rue Bay, bureau 302

Toronto, Ontario M5R 2A7

Telephone/téléphone: (416) 966-2221

FACSIMILE/-télécopieur: (416) 966-5485

Canada

Canada Eldor Inc.

Both Eldorado and the AECB concluded at that time that all that could and should reasonably be done had been done regarding Beaverlodge, with the only ongoing activity contemplated being periodic monitoring.

Since then, routine post-decommissioning monitoring has continued with some targeted environmental investigations and maintenance undertaken to ensure the continued protection of the environment and human health and safety. Cameco currently holds a waste facility operating licence issued by the CNSC to possess, manage and store nuclear substances with respect to the Beaverlodge properties. In 2013, Cameco was granted a ten-year licence by the CNSC to implement certain remedial actions identified through consultation with stakeholders in accordance with the approved Beaverlodge Management Framework and to complete the necessary follow-up monitoring to verify the effectiveness of these actions. Cameco now seeks the release of twenty properties from the CNSC Beaverlodge licence to facilitate their transfer to the Province of Saskatchewan's Institutional Control Program as outlined in its CMD. CEI fully supports this application and the plan to continue the release from CNSC licencing and transfer of the remaining Beaverlodge properties to the Saskatchewan Institutional Control Program over time.

Management of the decommissioned Beaverlodge properties has met expectations in all areas over the current licence term with respect to the properties for which release from CNSC licencing is sought. There have been no safety or environmental incidents at the properties in question. The gradual environmental recovery of the properties from the impact of historic operations continues as expected.

In accordance with its licence and the Beaverlodge Management Framework, Cameco has prepared twenty of the decommissioned properties for release from CNSC licencing in order that they can be placed in the custody of the government of Saskatchewan under that Province's *Reclaimed Industrial Sites Act*. This Act creates an Institutional Control (IC) framework under which long-term monitoring of properties such as Beaverlodge can continue at a level appropriate to the risk posed by the reclaimed land, and, if required, restrictions can be imposed with respect to future land use as deemed appropriate by the provincial government. The first five Beaverlodge properties were released into the IC program in 2009. CEI provided funds to Saskatchewan at that time to cover long-term monitoring and maintenance activities associated with the properties, and also made a contribution to the "unforeseen events fund" established by the Province under the IC program. These properties are monitored by the Province and there have been no adverse incidents or impacts with respect to these properties since their acceptance into the IC Program.

1240 Bay Street, Suite 302

1240, rue Bay, bureau 302

Toronto, Ontario M5R 2A7

Telephone/téléphone: (416) 966-2221

FACSIMILE/-télécopieur: (416) 966-5485

Canada

Canada Eldor Inc.

CEI is fully supportive of Cameco's request to now release an additional twenty of the decommissioned Beaverlodge properties from the CNCS Beaverlodge licence. We have provided the Saskatchewan government with written assurance as to our and through us the Government of Canada's ongoing financial support for continuing costs that will be incurred in ongoing monitoring all of the Beaverlodge properties released from the CNSC licence into the Province's IC Program. We look forward to working with the Province as the Beaverlodge properties continue to transition to Institutional Control.

1240 Bay Street, Suite 302 1240, rue Bay, bureau 302
Toronto, Ontario M5R 2A7
Telephone/téléphone: (416) 966-2221
FACSIMILE/-télécopieur: (416) 966-5485
Canada