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**Written submission from
Denison Mines Corp.**

**Mémoire de
Denison Mines Corp.**

In the Matter of the

À l'égard de

**Orano Canada Inc.,
McClellan Lake Operation**

**Orano Canada Inc.,
Établissement minier de McClellan Lake**

Application for licence amendment
for the expansion of the JEB Tailings
Management Facility (TMF) at the
McClellan Lake Operation

Demande de modification de permis pour
l'agrandissement de l'installation de gestion
des résidus (IGR) JEB à l'établissement de
McClellan Lake

Commission Public Hearing

Audience publique de la Commission

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Submission to the Canadian Nuclear Safety Commission

Orano Canada Inc.' Licence Amendment for the Expansion of the McClean Lake Operation's Tailing Management Facility

August 13, 2021

Introduction

Please accept this correspondence as Denison Mine Corp.'s ("Denison") written intervention for Orano Canada Inc.'s ("Orano") request for a licence amendment for the expansion of the McClean Lake Operation's JEB Tailings Management Facility ("JEB TMF").

Denison, through its wholly owned subsidiary Denison Mines Inc., owns 22.5% of the McClean Lake Joint Venture ("MLJV"). Orano owns 77.5% of MLJV and acts as the operator. The MLJV's assets include the McClean Lake Mill and associated infrastructure, and the McClean Lake uranium deposits and associated exploration ground (together, the "McClean Lake Project").

Amongst other considerations, Denison highlights the following in support of Orano's request for a licence amendment to allow for the expansion of the JEB TMF:

Minimizes the Environmental Footprint of Tailings Facilities in the Region

Denison is aligned with the observations made by the Joint Federal-Provincial Panel on Uranium Mining Developments in Northern Saskatchewan (McClean Lake and Midwest report 1993, McArthur River report 1997) which identified the importance of minimizing the proliferation of tailings management facilities in an effort to reduce the extent of the environmental footprint of uranium processing activities in northern Saskatchewan. The expansion of the JEB TMF is an important initiative in support of this consideration – as it is intended to result in the addition of capacity at an existing and already approved facility rather than building a new facility, with a new environmental footprint, in an alternative location as a means to manage regional mine wastes. Orano's experience and management practices have resulted in a safety and environmental record at the McClean Lake Project that is proven to be protective of people and the environment.

Operator Committed to Progressive Engagement

As an owner in the MLJV, Denison is well aware of and fully supportive of the engagement efforts Orano has conducted since 2012. It is evident from the list of engagement activities, outlined in Section 4.2 and 4.3, that Orano's efforts are extensive and continuous. Over a nine-year period Orano has worked diligently to adapt to the interests of various engagement organizations and expectations of interested parties to ensure the communities within proximity to the McClean Lake Project are informed about the activities occurring on site, including the proposed TMF expansion. For example, as agreed upon in the 2016 Ya'thi Néné Collaboration Agreement, Orano utilizes the Athabasca Joint Engagement and Environmental Subcommittee (AJES) as the primary engagement entity for the Athabasca Indigenous communities and municipalities, which was a shift from previous practice (prior to 2016) by Orano to engage directly with the various Indigenous communities and municipalities. Over the years, Orano has routinely and consistently met with various Indigenous and non-Indigenous entities and individuals, shared information, listened and heard concerns and issues, and responded and adapted to an evolving engagement landscape.

Leading Approach to Environmental Monitoring

We also note Orano's continued commitment to advance various arms-length community-based environmental monitoring programs (described in Section 4.4 and 4.5), which are considered by many to represent an example of a national best-practice by directly involving potentially affected Indigenous people in the monitoring process. These ongoing programs are developed and implemented with significant input from local residents and monitor environmental elements that are deemed important by the Indigenous communities. Results of the annual monitoring programs have consistently concluded that traditional country foods are safe for consumption in the region in which the McClean Lake Project is located. Denison views these programs as a vital bridge to share knowledge between people living within Northern Saskatchewan and industry operating in the region. Based on the progressive design planned for the TMF expansion, which builds on years of data collected through specific tailings monitoring programs associated with the McClean Lake Operation, we are confident the TMF expansion will not change the positive evidence regarding safe consumption of traditional country foods in the region.

Conclusion

Through our close collaboration with Orano over years of shared operations and experiences, Denison is well-informed and confident in Orano's competence as a reliable and ethical operator. Orano has established appropriate operating measures, undertaken comprehensive tailings-specific monitoring programs, and has demonstrated performance in engaging northern communities, protecting the environment, and ensuring the health and safety of workers and the public – all of which support the merit of the application for a licence amendment for the expansion of the JEB TMF. Denison fully supports Orano's application.