



Oral Presentation

Exposé oral

**Written submission from the
Canadian Nuclear Association**

**Mémoire de
l'Association nucléaire canadienne**

In the Matter of the

À l'égard de

Cameco Fuel Manufacturing Inc.

Cameco Fuel Manufacturing Inc.

Application to Renew the Class IB Nuclear
Fuel Facility Licence for Cameco Fuel
Manufacturing Inc. in Port Hope, Ontario

Demande de renouvellement du permis
d'exploitation de l'installation de combustible
nucléaire de catégorie IB pour Cameco Fuel
Manufacturing Inc. à Port Hope (Ontario)

Commission Public Hearing

Audience publique de la Commission

November 23-24, 2022

23 et 24 novembre 2022

October 7, 2022

Canadian Nuclear Safety Commission
c/o Louise Levert, Secretariat
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Dear Ms. Levert,

Re: Canadian Nuclear Association Intervention Regarding Cameco Corporation's licence renewal application for the Cameco Fuel Manufacturing facility

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life cycle of the nuclear industry and as such are supportive of Cameco Fuel Manufacturing's (CFM) request for a 20-year renewal of its licence and an increase in its production limit.

Nuclear energy is a safe, reliable, non-emitting source of energy that not only helps Canada and indeed the world meet its electricity needs but is also a critical element in the world's fight against climate change. It is widely acknowledged that nuclear energy must play a greater role if the world is to meet its climate change goals. Nuclear energy generates approximately 15% of Canada's electricity and CFM provides a significant amount of the fuel for Canada's nuclear fleet.

CFM's application is for a 20-year licence. In addition, CFM is seeking to increase the annual production limit to 1650 tonnes to align with current production capacity. As noted earlier, nuclear energy plays a critical role in reducing GHG emissions and Cameco's customers have made long-term commitments to provide that non-emitting electricity. A 20-year licence allows those customers to rely on Cameco as a secure and stable supplier of nuclear fuel, which in turn provides the environmental benefit of cleaner, reliable electricity to homes and businesses.

The CNA believes that it is important to note that in this application no new activities are being requested nor are there changes to existing production lines and equipment. Reporting requirements, release limits and action levels remain the same. Further, Cameco's world-class management system, radiation protection, safety, environmental, emergency and fire protection, waste management, security, safeguards and packaging and transport programs remain in place.



Like all members of the Canadian nuclear industry, Cameco is committed to continuous improvement and the CNA would like to note the following improvements over the previous licence period:

- Over the past decade significant upgrades have been put in place to automate both the handling of UO₂ powder and pellets within the facility as well as to the fuel bundle assembly process. This has resulted in lower employee dose rates and improved production conformance to customer specifications.
- CFM updated its Safety Analysis Report in 2021 to align with International Atomic Energy Agency (IAEA) standard, SSR-4 *Safety of Nuclear Fuel Cycle Facilities*.
- CFM developed and implemented Exposure Based Release Limits (EBRLs) to ensure the facility meets federal or provincial environmental quality criteria at the end of the appropriate mixing zones.
- CFM revised its Preliminary Decommissioning Plan and associated cost estimate. An updated financial guarantee was put in place to reflect the revised plan.

Cameco's highest priorities are the health and safety of its workers, the public and the environment. The CNA believes that the best indicator of future performance is past performance, and we would like to highlight the following in that regard:

- CNSC staff have reviewed the relevant Safety and Control Areas and in all cases the CFM has received a satisfactory rating.
- Cameco has a comprehensive Radiation Protection Program that is guided by the ALARA (as low as reasonably achievable, social and economic factors taken into account) principle. In 2020, the public dose from CFM's emissions was just 0.02mSv, which is 2% of the acceptable dose limit for a member of the public. In addition, the annual effective dose to Nuclear Energy Workers remained well below the regulatory limit.
- CFM recorded just one lost time injury over the previous review period and that occurred in 2015. The site has now gone seven years without a lost time accident. CFM's Total Recordable Injury Rate has also been on a downward trend for the last six years.
- Corporate safety culture assessments in 2016 and 2021 documented positive trends in safety culture metrics.
- CFM's environmental protection program meets ISO 14001 standards as well as Cameco's corporate requirements.
- CFM maintains an Environmental Risk Assessment (ERA), which is updated at least every five years. The ERA assesses the effects of activities to the environment and identifies measures to address potential adverse effects before they occur.
- CNSC staff found that the potential risks from physical stressors, as well as from radiological and hazardous releases to the atmospheric, aquatic, terrestrial and human environments from the CFM facility are low to negligible.



Like all members of Canada's nuclear industry, Cameco considers Indigenous consultation and engagement to be a top priority and not just on the occasion of a licence application but as a fundamental part of its day-to-day operations. Cameco proactively developed and submitted its Indigenous Engagement Report (IER) to the Canadian Nuclear Safety Commission (CNSC), which was developed in support of Cameco Fuel Manufacturing's (CFM) 20-year licence renewal request to fulfill the requirements of the CNSC's REGDOC 3.2.2 Indigenous Engagement. The IER clearly articulates the efforts and work Cameco has carried out to help build meaningful relationships with Indigenous communities. Examples of this work includes establishing regular meetings with Curve Lake and Scugog Island First Nations and facility tours for Curve Lake First Nation, the Indigenous Advisory Council for Small Modular Reactors and Anishinabek Nation. Cameco strives to keep Indigenous communities informed and provides copies of its community newsletters and quarterly and annual compliance reports.

Further, Cameco maintains an active Public Information Program. Cameco makes technical reports or summaries (i.e., ERA) available on a dedicated community website (www.camecofuel.com) as are CNSC Quarterly and Annual Compliance Reports. Further community engagement occurs through regular community activities, such as the Port Hope Fall Fair and Cameco's community barbeque, although those were limited during the COVID-19 pandemic.

It's important to highlight that a longer licence term does not diminish or reduce a licensee's engagement with the public, stakeholders and Indigenous communities. Cameco has a long history of open and transparent communications and engagement, and the CNA is confident that this work will continue regardless of the length of licence.

In 2022, Cameco engaged outside expertise to measure public opinion in Port Hope. The CNA believes it is important to note that 100% of the people polled were aware of Cameco's presence in the community and that 93% support Cameco's continued operations. When asked about support for CFM's application for a 20-year licence, the large majority – 82% - are supportive. In addition, 85% agree that Cameco does everything possible to protect people and the environment and 79% respondents believe Cameco makes information about its operations in Port Hope readily available to residents. These numbers clearly demonstrate that Cameco is well regarded and supported by the local community.

The CNA would also like to highlight that a longer licence term does not in any way reduce regulatory oversight or safety. The CNSC's comprehensive inspection and assessment program is not impacted by the term of the licence. As the Commission knows, there is an established process through the Licence Conditions Handbook to ensure any changes in requirements can be implemented within the licence term. The CNA agrees with the staff recommendation that CFM provide a comprehensive performance update to the Commission at the mid-point of the licence and we note that the Commission maintains the authority to call public proceedings at any time, including providing for intervenor participation and participant funding in such a proceeding.



In conclusion, the CNA believes that Cameco has clearly demonstrated its ability to operate CFM in a safe manner that protects workers, the public and the environment and we recommend the Commission grant the requested 20-year licence and increase in annual production limit.

Please feel free to contact Steve Coupland at couplands@cna.ca or 519-386-0704 should you have questions or require additional information.

Sincerely,



John Gorman
President and CEO
Canadian Nuclear Association

