



**Written submission from the  
Canadian Nuclear Association**

**Mémoire de l'  
Association nucléaire canadienne**

In the Matter of

À l'égard de

**Request for 2-Year Licence Renewal for  
Cameco Corporation's Beaverlodge Project**

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**Demande de renouvellement, pour 2 ans, du  
permis de Cameco Corporation pour le projet  
de Beaverlodge**

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Public Hearing - Hearing in writing based on  
written submissions

Audience publique - Audience fondée sur des  
mémoires

**March 2023**

**Mars 2023**

February 10, 2023

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

**Re: Canadian Nuclear Association Intervention Regarding Cameco Corporation's application to renew its waste facility operating licence for the decommissioned Beaverlodge mine and mill site.**

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 76,000 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 and environmental stewardship throughout the entire life cycle of the nuclear industry including the release of sites to long-term stewardship or free release.

Like all forms of energy, nuclear energy creates by-products which in our industry are often referred to as nuclear waste. The Canadian nuclear industry is a cradle to grave industry in that the proper decommissioning, disposal of nuclear material and the ultimate return of nuclear facilities to a state where they are available for alternative use is a responsibility our industry takes seriously and is a top priority.

The Beaverlodge Project is a decommissioned uranium mine and mill site that originally consisted of 70 individual properties licenced by the Canadian Nuclear Safety Commission (CNSC). Over the years, 42 properties have been exempted from CNSC licensing and accepted for entry into the province of Saskatchewan's Institutional Control Program (ICP) and one was free released. Twenty-seven properties currently remain under the CNSC issued licence. The current licence authorizes Cameco to manage reclamation, maintenance, and monitoring activities at the Beaverlodge Properties. Cameco's objective in managing these properties is to protect the health and safety of the public and environment, and to meet the requirements for the transfer of the decommissioned properties to the ICP.

On-site activities to prepare the final set of properties for release from CNSC licensing will be completed prior to the expiration of the current licence, however both Cameco and CNSC staff have determined that there will not be adequate time for the regulatory process, public and Indigenous engagement for final release before the expiration of the current licence hence the request for a two-year renewal of Cameco's waste facility operating licence. Other than the expiry date, no changes to the existing terms and conditions of the existing licence or Licence Condition Handbook are being requested.

CNA notes that CNSC staff conducted an Environmental Protection Review and verified that the health of persons and the environment remain protected and that no new activities are proposed. The site is in a stable and passive state and no changes to the project-environment interactions are expected as a result of this licence renewal.

CNA also notes that in 2020, Cameco submitted an updated Environmental Risk Assessment (ERA), which was completed in accordance with CSA N288.6 standard and used a pathways assessment to evaluate potential risks to ecological and human receptors on and downstream of the decommissioned properties. Consistent with previous assessments, the 2020 ERA concluded that the immediate and downstream environments will continue to naturally recover. It also showed that based on the reported use of the land, there is not expected to be any risk to human residing near or consuming food harvested from the properties.

As with all its sites, Cameco has a robust Public Information Program (PIP) designed to ensure interested audiences and Indigenous groups are informed on a timely basis about activities and any potential impacts on human health, safety and the environment. The primary audience for the Beaverlodge PIP is the rights bearing First Nation and Metis communities which are located in the vicinity of the decommissioned properties. Cameco also focuses engagement with the northern settlement of Uranium City, including the Uranium City Metis Local 50. It is important to note that Uranium City is the only community with year-round road access to the properties.

CNA reviewed the Beaverlodge Indigenous Engagement Report in Cameco's supplementary submission and note the long-standing relationship between Cameco and First Nations. In particular, we note that in 2016, Cameco signed a collaboration agreement with the seven Athabasca Basin communities - known as the Ya'thi Nene Collaboration Agreement. Under the agreement, the Athabasca Joint Engagement and Environment Subcommittee meet regularly to provide updates and discuss issues related to the Beaverlodge Properties. In addition, site tours were hosted in June and September. CNA also notes that no questions or concerns were raised regarding the proposed licence renewal during Cameco's engagement activities.

The CNA believes the Beaverlodge Properties are an excellent example of how a site can be operated for its life and then ultimately returned to a state similar to pre-mining, while ensuring the site poses no unreasonable risks to people or the environment and allowing access to the land for traditional activities.

Please feel free to contact Steve Coupland at [scoupland.sgcresearch@gmail.com](mailto:scoupland.sgcresearch@gmail.com) or 519-386-0704 should you have questions or require additional information.

Sincerely,



Jill Baker  
Vice President, Operations  
Canadian Nuclear Association

