



## **Objections to the Request for Confidentiality**

## **Objections à la Demande de confidentialité**

In the Matter of

À l'égard de

Cameco Corporation

---

Cameco Corporation

---

Revised preliminary decommissioning plan and financial guarantee for Cameco Corporation's Port Hope Conversion Facility

Plan préliminaire de déclassément et la garantie financière révisés pour l'installation de conversion de Port Hope de Cameco Corporation

Public Hearing - Hearing in writing based on written submissions

Audience publique - Audience fondée sur des mémoires

**December 2023**

**Décembre 2023**

**From:** [Faye More](#)  
**Sent:** Wednesday, November 15, 2023 9:17 PM  
**To:** [Interventions / Interventions \(CNSC/CCSN\)](#); [Interventions / Interventions \(CNSC/CCSN\)](#)  
**Subject:** Fw: Cameco Corp Port Hope Conversion Facility PDP 2022, Request for Confidentiality

---

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

November 15, 2023

To CNSC Commission Registrar: Please provide this email to the CNSC Chair and Commissioners submitted on behalf of the Port Hope Community Health Concerns Committee to be heard in this matter.

Dear Chair and Commissioners:

**Re: Cameco Corporation Port Hope Conversion Facility  
Preliminary Decommissioning Plan (PDP)  
Request for Confidentiality**

The Port Hope Community Health Concerns Committee objects to this request by Cameco Corporation to withhold information contained in its complete Preliminary Decommissioning Plan for the Port Hope Conversion Facility and its storage facility on Dorset Street East beyond that which is required by legislation to be confidential.

1. Cameco's Port Hope Conversion Facility is located on the shores of Lake Ontario, a source of drinking water for millions of people on both sides of the border, and on the Ganaraska River which flows through the community into Lake Ontario. The facility has been licensed for years despite having no buffer zone, is in the midst of our community, surrounded on three sides by homes and businesses. Photos in Cameco documents illustrate its location. By virtue of its licensed locations for decades both Cameco and the CNSC have a duty of care to the people to be as transparent as possible regarding future decommissioning plans with opportunities for informed public involvement.

2. All information related to planned remediation, restoration and intended future state of the lands currently occupied and contaminated by Cameco are of strong concern to the people of Port Hope and others impacted directly by these plans including First Nations peoples and residents of Blind River, the intended destination of much of the material to a planned new facility.

3. As the information intended to be withheld by Cameco is not known to us it therefore cannot be itemized in this submission as requested. Instead we argue a necessary and general principle for full disclosure of the PDP for maximum scrutiny and public comment on a matter of significant public concern both local and beyond.

4. Currently there is a \$1.2B federally funded cleanup of more than 1.2M cubic metres of radioactive wastes throughout Port Hope with agreed upon cleanup criteria. It is critical for the public to know whether or not Cameco intends to be in full compliance at its properties.

5. A detailed accounting of all steps and costs associated with the decommissioning including removing all radioactive contamination from the sites and restoration of the waterfront and Dorset Street East locations are essential for transparency and accountability to the public of its operations, now and in the future.

6. We have seen no rationale from Cameco to support its sweeping request for confidentiality in such an important matter to the public.

To act in the public interest, Commissioners should deny Cameco's request.

Submitted by

Faye More, Chair  
on behalf of the Port Hope Community Health Concerns Committee

# NORTHWATCH

November 17, 2023

Commission Registrar  
Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

CMD 23-H107

Re. Cameco Corporation's Request for Confidentiality for Port Hope Conversion Facility Preliminary Decommissioning Plan 2022

On November 10<sup>th</sup>, 2023 at 5:01 pm Northwatch received from the Canadian Nuclear Safety Commission a "Notice of Request for Confidentiality" setting out that Cameco Corporation has requested that its "Port Hope Conversion Facility Preliminary Decommissioning Plan 2022" be kept confidential. The Notice further stated that the comment period was limited to six days.

Northwatch had requested the Preliminary Decommissioning Plan on October 12, 2023 and had posed further questions with respect to the review schedule and currency of the PDP on October 17<sup>th</sup>, to which we received a response today, November 17<sup>th</sup>.

Northwatch objects to "Port Hope Conversion Facility Preliminary Decommissioning Plan 2022" being deemed a confidential document, and to the related notice and comment period, for the following reasons:

- The Port Hope Conversion Facility is the site of nuclear operation that began in the 1930s and is the scene of almost a century of radioactive and site contamination; the community of Port Hope and Lake Ontario have been impacted by these operations
- The decommissioning and cleanup of this site after closure is a matter of public interest
- Cameco has publicly stated that their decommissioning plan (as summarized by Cameco) includes the relocation of the decommissioning wastes to a radioactive waste facility which Cameco proposes to construct on the site of the Cameco uranium refinery in Algoma District, in the territory of Mississauga First Nation and Robinson-Huron Treaty Area, on the north shore of Lake Huron
- The nuclear risk and the potential for contamination of the proposed site of the waste deposition on the north shore of Lake Huron is a matter of public interest, and of particular concern to the public and Indigenous peoples on the transportation route and in the region of the proposed site
- Cameco is proposing that public access be limited to a summary of the Preliminary Decommissioning Plan which does not provide adequate information about the proposed approach to decommissioning or to the proposed dispositioning of the decommissioning wastes



- The information that should be made available to the public includes but is not limited to:
  - o A full and detailed inventory of the anticipated decommissioning wastes, including a full characterization of the wastes and any radioactive, toxic, combustible and flammable qualities of the waste
  - o A full and detailed estimate of the waste volumes, by category and characteristic
  - o A detailed description of the proposed waste management facility which Cameco had indicated will be the end point for the decommissioning wastes and will be located on the north shore of Lake Huron; the description should include design and dimensions and technologies to be employed, the monitoring plan and mitigation measures, and the method for waste retrieval in the event of facility failure
  - o Any other information which Cameco has included in its 2022 preliminary decommissioning plan

On October 6, 2023 the Canadian Nuclear Safety Commission issued a notice that it intends to conduct a hearing in writing on the revised preliminary decommissioning plan and financial guarantee for Cameco Corporation's Port Hope Conversion Facility and has invited persons who have an interest in this matter to comment, in writing, on Cameco's application by December 4<sup>th</sup>.

Clearly, Indigenous peoples and members of the public who have an interest in the preliminary decommissioning plan cannot comment on the plan if it is not available to them.

In effect, if the Commission permits Cameco Corporation to keep the preliminary decommissioning plan confidential, they are rendering the opportunity to comment on the plan moot and void.

For these reasons and those that may have been brought forward by others with an interest in this matter, Northwatch submits that the Canadian Nuclear Safety Commission must direct Cameco to make the preliminary decommissioning plan for the Port Hope Conversion Facility available to those who have an interest in this matter, including Northwatch.

Sincerely,



Brennain Lloyd  
Project Coordinator, Northwatch