



**Written submission from the
Port Hope Community Health
Concerns Committee**

**Mémoire de
Port Hope Community Health
Concerns Committee**

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 déclassement et la
garantie financière révisés pour l'installation
de conversion de Port Hope de Cameco
Corporation**

Hearing in writing based on written
submissions

Audience par écrit fondée sur des mémoires

December 2023

Décembre 2023



December 4, 2023

Dear CNSC Commissioners:

**Re: PHCHCC Intervention re: Cameco Port Hope Conversion Facility
Preliminary Decommissioning Plan (PDP) 2023**

The Port Hope Community Health Concerns Committee submits this intervention to the CNSC with respect to Cameco's Preliminary Decommissioning Plan (PDP) for the Port Hope Conversion Facility which includes its licensed Dorset Street East storage site, for consideration at the December 2023 CNSC hearing.

Appendix A: email from PHCHCC dated November 15, 2023 objecting to Cameco's request to the CNSC to withhold from the public details of its draft and future approved PDP. Members of the public cannot fully comment or participate in a thorough, informed manner now and in the future without such details yet are asked to provide comments once in five years on a very brief Summary. As yet we do not know your decision on Cameco's request but no further details of the PDP have been made available to the public by this writing.

Key Considerations:

i) Excerpt from Federal/Port Hope Remediation Legal Agreement, 2009

"Canada is prepared to mitigate the effects on the Municipalities and the property owners within the Municipalities of the work to be undertaken within each community Decommissioning" means the actions taken to retire the Cameco facilities in the Town of Port Hope from service and decommissioning includes, inter alia, the dismantling and removal of all process equipment and buildings and the cleanup of the property on which facilities were located.

Cameco Waste:

a) Cameco Decommissioning Waste – This type of Low-Level Radioactive Waste comprises Cameco-owned materials in the former Town of Port Hope and includes an inventory of 3,822 cubic metres of Low-Level Radioactive Waste materials that have been in storage at the Cameco facility since prior to 1988 and materials that would result from the decommissioning of Cameco-owned and/or operated processing facilities and associated properties utilized by Eldorado in the former Town of Port Hope prior to 1988. This includes Low-Level Radioactive Waste at the main plant site at 1 Eldorado Place and the Dorset Street East warehousing facilities (117,000 cubic meters) and at the Centre Pier property (30,000 cubic meters). The estimated total volume is approximately 150,000 cubic meters.”

ii) Excerpt from *Canada's Policy for Radioactive Waste Management and Decommissioning 2023*

“Waste generators and owners will

3.7. acknowledge the unique status of Indigenous peoples as rights holders in Canada; commit to respecting their rights; and work in partnership with Indigenous peoples to gain a greater understanding of the implications of radioactive waste management and **decommissioning projects on these rights**;

3.8. work in partnership with Indigenous peoples to gain a greater understanding of their Indigenous knowledge and advice with regards to radioactive waste management and decommissioning projects;

3.9. demonstrate meaningful and respectful engagement, on an early and ongoing basis, with Indigenous peoples who may be affected in the siting, construction, operation, and monitoring of radioactive waste management and decommissioning projects;”

Section B: Issues and Concerns with Cameco’s Summary PDP Document:

1. It is not possible to provide comprehensive comments to the regulator when the public is not informed of the content. There should be full disclosure of the Preliminary Decommissioning Plan for the public especially Port Hope, Blind River, First Nations, and other communities with nuclear operations of any kind to know, understand, comment, object to, be involved in the plan as described in Canada’s new policy.

2. The PHCF is on Lake Ontario at the mouth of the Ganaraska River and Port Hope harbor, in the midst of a town surrounded by homes, businesses, beside drinking water sources for millions of people. The Dorset Street East storage site is in the middle of a neighborhood of homes and businesses with sidewalks beside cylinders, beside parking areas. There is a huge public impact of decommissioning and restoring these properties properly and fully for future use.
3. The duty for Indigenous consultation must be respected and fulfilled not dismissed as it is in the brief Summary document provided for public comment.
4. The end state objectives for final cleanup of Cameco's current sites in Port Hope must be for unfettered future use applying the same cleanup criteria as in the Port Hope /federal Legal Agreement for remediation 2009 for the current 1.2B federally funded cleanup of historic radioactive wastes throughout the community. The current Summary wording for desired outcome that a CNSC license should not be required post decommissioning is not the same planned outcome nor adequate protection for the public for generations to come.
5. Cameco's PDP summary states it is based on a "decommission tomorrow" concept without defining what that is or means and what the implications are.
6. Explain the reference to and implications of wording to the effect of Cameco possibly not able to financially fulfill its decommissioning responsibilities.
7. Explain details of Cameco' plan of a solution consisting of construction of a centralized waste management facility for Cameco operations in Blind River. What is the basis for this assumption? What approvals have been sought and obtained for this plan with Blind River public and First Nations? What are the projected costs not only of construction but also ongoing maintenance.
8. Since 2017 and the previous Cameco PDP discussions, the average rate of inflation (according to the Bank of Canada) each year is 3.25% totalling 21.2% in 2023. Applied to Cameco's current financial guarantee of \$128.6M it can be argued that the increase now should be \$27.3 for a total of \$155.9M based on this factor alone.

What is the basis for the proposed increase to the financial guarantee of only 7.4% or \$9.6M after 6 years rather than 21.2%?

What is the basis for and inclusions in the total proposed financial guarantee of \$138.2M?

9. The lands on Lake Ontario waterfront and beside the Ganaraska River on which the Cameco Conversion Facility is located (and immediate surrounding area) have been highly contaminated with radioactive wastes and air emissions from various nuclear operations beginning in the 1930's with radium refining. The Commissioners should view all of the AECL documentation on Cameco's CF property from its property investigations as well as Dorset Street East storage area as there is extensive remediation that must happen for full restoration of the lands which should be included in the PDP.
10. Will the taxpayers of Canada and Port Hope specifically be required to pay any costs for Cameco decommissioning and restoration of the lands if so, what are those costs estimated to be?
11. What changes are required to the existing Letter of Credit?
12. Why is CNSC expected by Cameco to approve first before a sample of the wording is reviewed?

In order for the public to be properly informed and fully participate in this process we require the information contained in Cameco's detailed PDP. We trust the CNSC will refuse Cameco's request for confidentiality and release the full document.

Submitted on behalf of the
Port Hope Community Health Concerns Committee

Faye More
Chair

Cc. Northwatch, Brennain Lloyd, Dr. Gordon Edwards.

Appendix A: November 15, 2023 email from PHCHCC to CNSC re Cameco's request for confidentiality for its PHCF PDP.

Appendix A *Copy of email submission to CNSC re Cameco's request for confidentiality of its updated Preliminary Decommissioning Plan 2023*

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: Camecco 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