



**Written submission from  
Susan O'Donnell**

**Mémoire de  
Susan O'Donnell**

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**

**From:** [Susan O'Donnell](#)  
**Sent:** Monday, December 18, 2023 7:00 AM  
**To:** [Interventions / Interventions \(CNSC/CCSN\)](#)  
**Subject:** Objection to request for confidentiality by Cameco re the PDP for the Port Hope Conversion Facility

---

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

December 18, 2023

Commissioners,

Although I live in New Brunswick, I'm intervening in this Ontario project because I'm concerned about the lack of independent / public scrutiny of proposed nuclear activities in Canada. The environmental impact from the decommissioning of nuclear facilities is of great interest to many New Brunswickers.

I am registering my objection to the CNSC decision to allow Cameco to designate the preliminary decommissioning plan for the Port Hope Conversion Facility as confidential and not release it to the public. I'm concerned that this decision will set a precedent for future CNSC decisions related to the decommissioning of nuclear facilities in New Brunswick.

In its letter (September 30, 2022) to the CNSC requesting that the full PDP be withheld from public scrutiny, Cameco wrote:

*"The PDP document contains prescribed information and controlled nuclear information pursuant to the Nuclear Non-proliferation Import and Export Control Regulations **as well as information that Cameco is of the view should not be disclosed in a response to a request made pursuant to the Access to Information Act.** Cameco will therefore not be making these documents publicly available and the attachment to this letter will be encrypted and submitted to the CNSC via secure file transfer. A summary document is available to the public on Cameco's website ([www.camecofuel.com](http://www.camecofuel.com))."*

I note that when information is requested from an organization and withheld under the *Access to Information Act*, the organization must reference specific sections of the Act justifying why the information was withheld. This has not happened in this case. In addition, the requester has the right to file a complaint with the Information Commissioner of Canada who is then obligated to review the complaint and make an impartial decision. I submit that the same process should apply in this case: that Cameco and the CNSC must provide the document with the information redacted with reference to justification reasons in the Act, and that I have the right to file a complaint with the Information Commissioner of Canada if I am not satisfied with the reasons.

Thank you,

Susan O'Donnell, PhD  
Adjunct Research Professor  
Lead investigator, the [CEDAR](#) project  
Environment and Society Program  
St. Thomas University  
Fredericton, New Brunswick, Canada