



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 Corporation, Rabbit Lake
Operation**

**Cameco Corporation, établissement de
Rabbit Lake**

Application for the renewal of uranium
mine/mill licence for Rabbit Lake Operation

Demande visant le renouvellement du permis
d'exploitation de mine et d'usine de
concentration d'uranium pour l'établissement
de Rabbit Lake

Commission Public Hearing

Audience publique de la Commission

June 7-8, 2023

7-8 juin 2023

April 24, 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 uranium mine and mill licence for the Rabbit Lake Operation.

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 throughout the entire life cycle of the nuclear industry and as such CNA is supportive of Cameco Corporation's request for a 20-year renewal of its uranium mine and mill licence for the Rabbit Lake Operation.

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 it is also a critical element in the world's fight against climate change. It is increasingly acknowledged that without a significant increase in the use of nuclear energy the world cannot meet the Paris agreement targets. Uranium mining and milling is the first step in the nuclear fuel cycle and not only is Canada blessed with an abundance of uranium, but Canada has decades of experience safely mining and processing uranium.

Rabbit Lake is Canada's longest operating uranium mine and mill, with the first uranium processed in 1975. Rabbit Lake is the second largest uranium mill in the world. Since 1975, Rabbit Lake has produced more than 78 million kilograms of uranium ore from five different ore bodies. Since 1993, Rabbit Lake produced uranium ore concentrate primarily from milling the Eagle Point ore body. However, as a result of depressed uranium market conditions during the last licence term, production was suspended in 2016 and Cameco place Rabbit Lake into a safe state of care and maintenance.

The CNA agrees with Cameco's view of long-term growth in the nuclear industry, and acknowledges the efforts made to provide Rabbit Lake the ability to respond to evolving market conditions. While considerable financial and administrative efforts have been made to maintain that flexibility, a decision to resume production is not expected until market conditions improve, and the site remains in a safe state of care and maintenance. During care and maintenance, Cameco has, and will continue to focus on key functions on site in order to maintain the flexibility to conduct current and future activities in accordance with the licence. These functions include:

- Maintaining the safety of the public, workers, and the protection of the environment.
- Collecting and treating potentially contaminated water.
- Continued maintenance of critical infrastructure.
- Ensuring commitments to stakeholders are met.



By taking this responsible approach Cameco is both meeting its responsibilities under the CNSC licence and preserving the ability to activate an important resource should/when Canada, or the world needs more uranium to meet our Net Zero goals.

The CNA notes that Cameco has achieved strong performance in protecting the health and safety of people and the environment and achieving continual improvement in facilities and management systems of the course of the current licence term. Highlights include:

- Low effective doses received by workers.
- Continual improvement in key safety metrics.
- Successful activation of Corporate Crisis Management Plan during the COVID-19 pandemic.
- Improvement in the quality of all water treated and released to the environment during the current care and maintenance period.
- Ongoing progressive reclamation activities in areas of the site no longer required for future mining or milling activities.

During the current licence term, Cameco conducted two Environmental Risk Assessments (2015 and 2020) that demonstrated that human health and the environment in the vicinity of the Rabbit Lake operation remain protected. Cameco also has a comprehensive environmental monitoring program in place that meets both CNSC and provincial requirements. CNA notes that CNSC staff reviewed the environmental risk assessments, quarterly and annual compliance monitoring reports, past performance and concluded that Cameco meets the regulatory requirements under the Nuclear Safety Control Act. CNA also notes that CNSC staff will continue to verify the health and safety of people and the environment through ongoing compliance activities and reviews. The CNSC requires the licensees of uranium mines and mills to have in place a waste management program for generation, transport, handling, processing, storing, or disposing of wastes. Cameco has implemented a waste management program to effectively control wastes generated and stored at Rabbit Lake. Cameco disposes waste on site only when it cannot be practically reduced, reused, recycled and/or recovered. Quantities of wastes produced, recycled, stored, and disposed of are tracked.

The Canadian nuclear industry is a cradle to grave industry and the proper decommissioning, disposal of nuclear material and the ultimate return of nuclear facilities to state where they are available for alternative use is a responsibility our industry takes seriously and is a top priority. CNA would like to highlight that Rabbit Lake has a long history of progressively reclaiming areas of the site that are no longer required for future mining or milling activities. During the current licence term ongoing revegetation of B-Zone WRP as well as reclaimed mining areas at D-Zone and A-Zone included the planting of approximately 28,00 native trees and shrubs. In the next licence term Rabbit Lake will evaluate the potential to progressively reclaim the B-Zone Pond.

Cameco has developed a long-standing relationship with northern Indigenous communities. Cameco's relationship with Indigenous communities is focused on providing benefits from resource development through workforce and business development opportunities, community investment initiatives, community engagement activities and environmental stewardship while recognizing the rights of Indigenous Peoples to be consulted by the Crown.

Consistent with Cameco's vision, mission and values community engagement is carried out through the Rabbit Lake Public Information Program (RAM-PIP). The primary audience for RAM-PIP is the rights-bearing First Nation and Métis communities and municipalities of the Athabasca Basin located in the vicinity of the site. Cameco has a long history of collaboration including the 1999 Impact Municipal Agreement, the 2016 Collaboration Agreement, and the Community Based Environmental Monitoring Program.

During the licence term, over 94 specific engagements events were held focused on providing members of the public with ongoing updates on the activities including discussion on the surface and underground activities as well as the results of environmental monitoring. In addition, Cameco undertook early and proactive engagement with Indigenous communities in support of the licence renewal process. During that engagement communities expressed uncertainty with what an indefinite licence term means and how it fits within existing regulatory and engagement frameworks. In response to these concerns Cameco submitted a revised application requesting a 20-year licence.

The longer licence term Cameco has applied for would provide Cameco with an increased level of regulatory certainty and predictability while continuing to protect the health and safety of the public, workers and the environment as well as facilitate Cameco's ability to make longer term plans and budgeting investment decisions. This increased level of regulatory certainty would in turn benefit communities through Cameco's ability to sustain their community commitments into the future.

CNA believes that the best indicator of future performance is past performance and Cameco has proven itself to be a reliable, safe operator of multiple mines and mill over many decades. Based on that track record and the strong performance in all SCAs at Rabbit Lake throughout the current licence period, the CNA believes Cameco has demonstrated that it is qualified to carry out all licensed activities and the CNA is pleased to strongly support Cameco's application to renew its operating licence for a 20-year term.

If you have any questions or require additional information, please contact Steve Coupland at scoupland.sgcresearch@gmail.com

Regards,



Jill Baker, VP Operations

