



**Written submission from
Cameco Corporation**

**Mémoire de
Cameco Corporation**

In the Matter of the

À l'égard de

Orano Canada Inc., Cluff Lake Project

Orano Canada Inc., Projet de Cluff Lake

Request to Revoke the Current Licence and
Release the Cluff Lake Project to the
Institutional Control Program

Demande visant à révoquer le permis pour le
projet de Cluff Lake et à transférer la propriété
au Programme de contrôle institutionnel

Commission Public Hearing

Audience publique de la Commission

March 1, 2023

1^{er} mars 2023

Please accept this correspondence as Cameco Corporation's (Cameco) written intervention in support of Orano Canada Inc's (Orano) request to revoke the uranium mine and mill licence for the decommissioned Cluff Lake Project, to facilitate the transfer of the property to the Province of Saskatchewan for long-term oversight, under the Institutional Control Program (the ICP).

Cameco is one of the largest global providers of the uranium fuel needed to energize a clean-air world. Our competitive position is based on our controlling ownership of the world's largest high-grade reserves and low-cost operations. Utilities around the world rely on our nuclear fuel products to generate safe, reliable, carbon-free nuclear power.

In addition to our uranium mine and mill facilities in northern Saskatchewan, Cameco is also the licensee for the decommissioned Beaverlodge properties. Located near Uranium City, Beaverlodge was operated by Eldorado Nuclear (a federal crown corporation) and consisted of a main mining and milling facility, with a number of satellite mines, that operated from 1953 to 1982. Decommissioning of Beaverlodge was completed in 1985 by the operator following a regulatory approved decommissioning plan. Cameco has managed the monitoring and maintenance of the decommissioned properties, on behalf of the federal government, since 1988.

During the current licence term, Cameco has followed the approved Beaverlodge Management Framework (the Framework) to demonstrate that the decommissioned properties are safe, secure and stable, and suitable for transfer into ICP. The Framework provides a systematic process for understanding environmental conditions and land use on the decommissioned Beaverlodge Project properties, with the objective to ensure the properties met the criteria for release from CNSC licensing. To date, forty-three decommissioned properties have been released from CNSC licensing and, either approved for transfer into the ICP, or free released, depending on the presence or absence of historical mining activities. Currently, Cameco is seeking a 2-year licence renewal in 2023 to accommodate the regulatory process and engagement associated with the transfer of the remaining properties into ICP. As such, Cameco is familiar with the requirements to decommission a site, as well as the review process and level of engagement needed to prepare decommissioned properties for acceptance into Saskatchewan's ICP.

The Cluff Lake Project, operated by Orano and its predecessors, mined and milled uranium ore from 1980 to 2002. Following a comprehensive environmental assessment study and licensing process, the majority of physical decommissioning works were completed in 2006 and the site transitioned into a post-decommissioning monitoring and maintenance phase.

In 2019, provincial and federal regulators acknowledged the site met decommissioning objectives and criteria. Thereafter, the licensed area was reduced to approximately 300 ha, representing the area that would be subject to the long-term oversight provided by ICP. Post-decommissioning monitoring, studies and evaluations concluded that the site is safe and will continue to be in the future.

During the current licence term, Orano has completed the remaining minor physical decommissioning works and conducted monitoring and maintenance activities. Orano has demonstrated, through transition-phase monitoring, modelling, and risk assessment, that the decommissioning objectives have been achieved. The decommissioned Cluff Lake site is in a

safe, secure and stable condition as Orano has prepared the site for transfer to the Province of Saskatchewan for long-term oversight, under the ICP.

Orano's Cluff Lake Project is a modern example of how a company can operate a mining facility for over 2-decades, while successfully planning for its eventual decommissioning. The property has been returned to a state similar to pre-mining, will pose no unreasonable risk to humans or the environment and allow for completely unrestricted access to the land for traditional activities. Environmental monitoring and risk assessment have concluded that the area can be safely used for traditional purposes such as trapping, hunting, fishing and gathering now and by future generations. Foods from the site and surrounding area are safe to share with community and family members, including children.

Indigenous communities, residents and land-users were engaged throughout the life cycle of the Cluff Lake Project. As a signatory to the 2016 Ya' thi Néné Collaboration Agreement (CA) and a participant in presentations and information sharing opportunities with the Athabasca Joint Engagement and Environmental Subcommittee (AJES) and the Northern Saskatchewan Environmental Quality Committee, along with Orano's Public Information Program, Cameco is well-informed and confident in the level of engagement and outreach that Orano has conducted on Cluff Lake.

In 2016, Cameco, along with Orano signed a confidential collaboration agreement (CA) with the seven Athabasca Basin Communities, referred to as the Ya' thi Néné CA. The company's obligations for informing and engaging with the Athabasca Basin communities are described and an engagement process was formally established. Engagement primarily occurs through the AJES, a subcommittee formed through the CA to represent the Basin communities.

Upon release from CNSC licensing and transfer to the IC Program, the decommissioned properties will be overseen by a responsible authority, the Province of Saskatchewan. A long-term monitoring and maintenance plan that was developed by Orano in consultation with provincial and federal regulators and community rights holders; which will be administered by the province.

Orano has been a competent operator of the decommissioned Cluff Lake property and has effectively concluded the activities authorized by the licence. In our view, Orano has successfully transitioned Cluff Lake from decommissioning to post-decommissioning, while ensuring the protection of the environment and the health and safety of persons.

In summary, Cameco has reviewed Orano's submission to the CNSC and fully supports Orano's request to revoke the uranium mine and mill licence for the decommissioned Cluff Lake Project to facilitate the transfer of the property to the Province of Saskatchewan under the ICP.