



File / dossier : 6.01.07

Date: 2023-01-12

Edocs: 6950745

**Written submission from the
Canadian Nuclear Association**

**Mémoire de
l'Association nucléaire canadienne**

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

January 12, 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 Orano's application for the revocation of its Cluff Lake uranium mine and mill operating licence.

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 and environmental stewardship throughout the entire life cycle of the nuclear industry including the release of sites to long-term stewardship or free release.

Like all forms of energy, nuclear energy creates by-products which in our industry are often referred to as nuclear waste. 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. Orano's Cluff Lake Project is an excellent example of this commitment, and the CNA is pleased to support Orano's application.

Mining activity began at the Cluff Lake site in 1980 and ceased in 2002. Regulatory approval for decommissioning was granted in 2004 with approved end-state decommissioning objectives. The majority of physical decommissioning was completed in 2006 and the Cluff Lake site has been in post-decommissioning monitoring since 2006. Full-time on-site presence ended in 2013.

In 2019, Orano submitted a Detailed Post-Decommissioning Plan to the Government of Saskatchewan and to the CNSC which details the long-term environmental monitoring program. The CNSC and provincial staff have reviewed the Plan and have concluded that it adequately addresses the predicted long-term needs of the site, people and the environment. In 2020, Orano requested that their licence be revoked, and that regulatory oversight be transferred from the CNSC to the Government of Saskatchewan's Institutional Control Program (ICP).

The CNA believes it is important to note that upon transfer to the ICP the property is not abandoned but overseen by a responsible authority namely the Government of Saskatchewan who will manage any monitoring and maintenance as outlined in the Post-Decommissioning Monitoring Plan. The ICP was designed in collaboration with the CNSC to meet provincial, national and international obligations for the oversight of decommissioned radioactive waste. The ICP has shown to be effective in ensuring properties placed into it are protected, secure and stable and will not in the future pose an unreasonable risk to the health and safety of people or the environment and this gives the CNA confidence in the ICP's ability to assume responsibility for the site.



The CNA notes that an environmental protection review was conducted by CNSC staff and concluded that the potential risks from radiological and hazardous sources are low to negligible and are similar to natural background. CNSC staff carried out an Independent Environmental Monitoring Program in 2017 and the results indicate that the public and the environment in the vicinity of the Cluff Lake site are protected and that there are no expected health impacts as a result of past operations on the site. CNA also notes that CNSC staff stated that they are confident that the site is protected and will remain so in perpetuity.

Over the course of the Cluff Lake site decommissioning process both Orano and CNSC staff have been actively engaged with Indigenous communities. CNA notes that some members of Indigenous communities have expressed fears and a desire to avoid the Cluff Lake property with respect to traditional activities. In addition, concerns were raised around engagement and transparency with respect to long-term monitoring. CNA recognizes that Orano has acknowledged these concerns by a few community members and have been actively engaged with the community to further address those concerns. CNA supports the work Orano and CNSC staff have done to alleviate these concerns and supports the need for the ICP to include Indigenous communities in long-term monitoring activities and to continue engagement to build trust in the safety of the site for traditional activities.

The CNA believes the Cluff Lake Project is an excellent example of how a site can be operated for its life, while planning for decommissioning to return the site to a state similar to pre-mining and ensuring the site poses no unreasonable risks to people or the environment and allow access to the land for traditional activities.

In conclusion, the CNA strongly supports Orano's application and encourages the Commission to facilitate the transfer of the decommissioned Cluff Lake site to Saskatchewan's ICP.

Please feel free to contact me at bakerj@cna.ca should you have questions or require additional information.

Sincerely



Jill Baker

Vice President, Operations

