



Request for Confidentiality of Material Submitted in Relation to CMD 25-H116

IMPORTANT NOTE:

The purpose of the confidentiality request process is to seek a decision from the Commission as to whether specific information being submitted for a Commission proceeding can be protected. Generally, material received as part of a matter before the Commission is made available to the public by default. The rule of confidentiality (i.e., rule 12 of the [CNSC Rules of Procedure](#)) is applied only if a request for confidentiality is submitted.

The Commission weighs any request for confidentiality against the criteria set out in rule 12 to confirm that:

- the importance of protecting the information outweighs the public interest in public hearings and disclosure of evidence; and
- the measures taken to protect confidentiality are designed to ensure that the public nature of the proceeding will be affected only to the extent necessary to adequately protect the information.

In the interest of enabling a timely decision, any request for confidentiality must be accompanied by redacted versions of all documents named in the request, and/or adequately informative summaries that can be made available to participants and the public. **Please provide the appropriate versions, as applicable.**

It is the responsibility of the requestor to provide an adequately detailed explanation as to how and why sub-rule 12(1) applies.

In the matter of:

TRIUMF Preliminary Decommissioning Plan and Financial Guarantee

With regard to: CMD 25-H116

I, **Roxana Ralea**, am an authorized representative of **TRIUMF Inc.** I understand that:

- documents and information ("the material") provided to the Canadian Nuclear Safety Commission ("the Commission") as part of a public proceeding will be made publicly available unless the Commission has rendered a decision to take measures to protect it; and
- regardless of any request for confidentiality or approval of same, the material may be disclosed if the Commission is required by law to disclose it (for example, after a request under the [Access to Information Act](#)).

I hereby request that the Commission take measures to protect the following information, pursuant to rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#) (the Rules):

Material to be Deemed Confidential:

The material to be deemed confidential is identified in Table 1, below.

NOTE 2: Where the request for confidentiality applies only to part of the submission, the portions to be deemed confidential must be clearly identified to distinguish them from any content that is non-sensitive.

NOTE 3: The Commission is not responsible for any copyright infringement due to its publication on the public CNSC website of documents that have been submitted by a third party.

Table 1: Material to be Deemed Confidential

	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
1.	<i>Amended and Restated Fund Contribution Gap Agreement.</i>	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input checked="" type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
2.	<i>Amended and Restated CNSC Financial Security and Access Agreement.</i>	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input checked="" type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input checked="" type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.

Proposed measure(s) to be taken and Detailed reason(s) for request:

The above-noted material should be protected for the following reasons:

Table 2: Detailed Reason(s) for Request

Item Name	Measure being Requested	Reason(s) for Request
<i>Amended and Restated Fund Contribution Gap Agreement.</i>	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	<p><u>The information is of a financial nature</u></p> <p>This document contains confidential information of a financial nature. Public disclosure may impact TRIUMF's ability to sign on new member institutions, negotiate commercial agreements to generate revenue, impact negotiating positions with vendors to prepare future PDP submissions, and/or future government funding to support TRIUMF operations.</p> <p>This is a confidential agreement between the CNSC, TRIUMF and multiple other signatories who considered third parties to any information TRIUMF provides to the CNSC. TRIUMF does not have their consent to disclose this information</p>
<i>Amended and Restated CNSC Financial Security and Access Agreement.</i>	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	<p><u>The information is of a financial nature</u></p> <p>This document contains confidential information of a financial nature. Public disclosure may impact TRIUMF's ability to sign on new member institutions, negotiate commercial agreements to generate revenue, impact negotiating positions with vendors to prepare future PDP submissions, and/or future government funding to support TRIUMF operations.</p> <p>This is a confidential agreement between the CNSC, TRIUMF and multiple other signatories who considered third parties to any information TRIUMF provides to the CNSC. TRIUMF does not have their consent to disclose this information</p>

Attestation

1. I attest that the above-noted material is not available through any public sources.
2. **MANDATORY:** I have included a **summary** or **redacted** version of the material that provides adequate detail to satisfy the public interest in public hearings and disclosure of evidence.
3. I understand that if this request is not approved by the Commission and/or no protection measures are taken, the information will be part of the public record as per rule 15 of the Rules.
4. I understand that upon receipt of this request, the Commission Registrar will treat the material that is subject to this request as confidential unless and until the Commission makes a ruling to deny this request.

Attachments:

1. *Amended and Restated Fund Contribution Gap Agreement.*
2. *Amended and Restated CNSC Financial Security and Access Agreement.*

Authorized signature:



Roxana Ralea, Radiation Safety Officer, TRIUMF Inc

22 Dec 2025

Date

Summary of the material:

1. The *Amended and Restated Fund Contribution GAP Agreement* notes that TRIUMF's member institutions agreed to have TRIUMF INC. assume the operations and assets of the Joint Venture effective June 1, 2021. This includes transferring the CNSC Licence to TRIUMF INC and TRIUMF INC. assuming all CNSC regulatory obligations, including decommissioning activities. Furthermore, it outlines obligations and process to address any gap in funds for decommissioning costs amongst the signatories.
2. The *Amended and Restated CNSC Financial Security and Access Agreement* is partied by the CNSC, TRIUMF INC., and TRIUMF's member institutions and required by the CNSC's licence conditions. This document notes TRIUMF INC. assuming the operations and assets of the Joint Venture effective June 1, 2021, including transferring the CNSC Licence to TRIUMF INC and TRIUMF INC assuming all CNSC regulatory obligations, including decommissioning activities and funds.