



CMD 25-H115 - CNSC Staff Submission

Cameco Corporation Rabbit Lake Operation – Financial Guarantee Review

Classification	UNCLASSIFIED
Type of CMD	Original
CMD Number	25-H115
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Type of audience	Hearing in writing based solely on written submissions
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Word e-DOC #	7496812
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Attachments	The following items are attached: • Current licence: UML-MINE-RABBIT.00/2038 • Draft licence conditions handbook: LCH-MINEMILL-RABBIT.01/2038
Summary	This CMD presents information about the following matters of regulatory interest with respect to Cameco Corporation's Rabbit Lake Operation: • The revised financial guarantee for the Rabbit Lake Operation.
Actions required	CNSC staff recommend the Commission consider taking the following actions: • Accept CNSC staff conclusions that the Preliminary Decommissioning Cost Estimate accurately reflects the PDP • Accept the proposed revised amounts of the financial guarantee for the Rabbit Lake Operation • Direct Cameco Corporation to submit to the Commission, within 90 days of the publication of a decision, revised financial instruments.



CMD 25-H115 - Soumission du personnel de la CCSN

Cameco Corporation Établissement de Rabbit Lake – Examen de la garantie financière

Classification	NON CLASSIFIÉ
Type du CMD	Version initiale
Numéro du CMD	25-H115
CMD(s) de référence	N/A
Type d'audience	Audience par écrit fondée uniquement sur des mémoires
Date de l'audience	N/A
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Pièces jointes	Les pièces suivantes sont jointes : • Permis actuel: UML-MINE-RABBIT.00/2038 • Ébauche du manuel des conditions de permis: LCH-MINEMILL-RABBIT.01/2038
Sommaire	Le présent CMD fournit de l'information sur les questions d'ordre réglementaire suivantes concernant les établissements de Cameco Corporation à Rabbit Lake: • Les garanties financières révisées pour les établissements de Rabbit Lake.
Actions requises	Le personnel de la CCSN recommande à la Commission envisager les mesures suivantes : • Accepter les conclusions du personnel de la CCSN selon lesquelles l'estimation préliminaire des coûts de démantèlement reflète fidèlement le PDP • Accepter les montant révisés proposés aux garanties financières pour les établissements de Rabbit Lake • Donner instruction à Cameco Corporation de soumettre les instruments financiers révisés à la Commission, dans les 90 jours suivant la publication d'une décision.



CMD 25-H115
Cameco Corporation
Rabbit Lake Operation – Financial Guarantee Review
Signed by:

X

Kim Campbell
Director General (Acting), DNCFR



Cameco Corporation Rabbit Lake Operation – Financial Guarantee Review

Canadian Nuclear Safety Commission



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Land acknowledgement

Canadian Nuclear Safety Commission (CNSC) staff would like to acknowledge that the Rabbit Lake Operation site is located in northern Saskatchewan on Treaty 10 territory (1906) and the Homeland of the Métis, and is within the traditional territories of the Denesų́liné, Cree, and Métis.

Plain language summary

As part of the routine 5-year review cycle, Cameco submitted an updated preliminary decommissioning plan (PDP) and preliminary decommissioning cost estimate (PDCE) for the Rabbit Lake Operation. These documents serve to update the current PDP and PDCE, which were submitted in 2018 and finalized in 2020, as required under the 5-year review cycle, or at the Commission's request. Licensees may also request a review of their financial guarantee at any time. No licence changes are proposed.

CNSC staff completed a technical review of the revised PDP and PDCE for the Rabbit Lake Operation. An increase in the financial guarantee amount is proposed. All technical comments have been addressed, and the plan and cost estimate comply with regulatory requirements. Furthermore, the Saskatchewan Ministry of Environment has accepted the revised PDP and PDCE for the Rabbit Lake Operation.

Should the Commission accept the proposal, the licence conditions handbook will be updated to account for the new PDP, PDCE and financial guarantee instruments.

Referenced documents in this CMD are available to the public upon request, subject to confidentiality considerations.

1 Overview

1.1 Background

Cameco Corporation is the licence holder and operator of the Rabbit Lake Operation, which is situated within the Wollaston Lake watershed on the eastern extremity of the Athabasca Basin. The site is located adjacent to Wollaston Lake and is roughly 30 km across the lake from Hatchet Lake First Nation and the community of Wollaston Post. The Rabbit Lake Operation is approximately 750 km north of Saskatoon and is accessible by air and overland via Highway 905. The site is in proximity to Cameco's Cigar Lake Operation and Orano Canada Inc.'s McClean Lake Operation, as seen in Figure 1.

The Rabbit Lake Operation spans a physically large site which includes an underground uranium mine, a uranium mill, tailings management areas, waste management facilities, a water treatment plant (WTP), administration offices and warehouses.

On April 21, 2016, Cameco announced the suspension of production at the Rabbit Lake Operation and the planned transition of the operation into a safe state of care and maintenance. It has remained in a safe state of care and maintenance continuously through to the present. CNSC staff have not been informed of any plans to mine ore, nor to operate the mill at the Rabbit Lake Operation.

Figure 1 : Location Map



This map shows the location of the Rabbit Lake operation relative to Saskatoon and the other operating uranium mines in the Athabasca Basin.

In line with the 5-year review cycle for the Rabbit Lake PDP, on December 14, 2022, Cameco submitted an updated draft PDP and PDCE for review by the Saskatchewan Ministry of Environment (SMOE) and CNSC staff. These documents serve to update the current PDP and PDCE, which were finalized in 2020.

After addressing technical review comments from both agencies, a revised final PDP and PDCE were submitted by Cameco on November 22, 2024.

The PDP and its public summary [1, 66] outline the end state of the operation, as summarized in section 1.2 of this CMD, and the steps the licensee will take to reach that end state. The PDCE [2] outlines the basis for the value of the financial guarantee and is based on the project end state as described in the PDP. CNSC staff subject-matter experts reviewed and assessed the PDP and PDCE against Canadian Standards Association (CSA) Group standard N294.19 [44] and CNSC regulatory documents and confirmed that the submissions meet regulatory requirements.

Under Saskatchewan's [*The Mineral Industry Environmental Protection Regulations, 1996*](#), SMOE requires that mining and milling operations prepare decommissioning plans and financial assurances (equivalent to the term financial guarantee under the [*Nuclear Safety Control Act*](#) (NSCA)). SMOE completed their review of the PDP and PDCE for the Rabbit Lake Operation and have accepted the reports and the proposed financial guarantee amount [3].

A [*Memorandum of Understanding*](#) (MoU) between the CNSC and the province of Saskatchewan on reclamation and financial guarantees guides cooperation between the parties [55]. The MoU stipulates that it is not intended to require owners and/or operators of uranium mining and milling facilities in Saskatchewan to provide separate and distinct financial guarantees to satisfy each of federal and provincial requirements. The CNSC and SMOE work closely in aligning and coordinating decommissioning and financial guarantee requirements. SMOE is the beneficiary of the financial guarantee for all operating and decommissioned uranium mines and mills in Saskatchewan and provides their own acceptance of the financial guarantee separate to approval by the Commission. The SMOE can invoke the Commission-approved financial guarantee to ensure decommissioning is carried out under extenuating circumstances such as bankruptcy or a failure of the licensee to meet regulatory requirements.

1.2 Highlights

The following is a summary of the financial guarantee regulatory review for Rabbit Lake:

- Cameco submitted an updated draft PDP and PDCE in December 2022 for review by CNSC and SMOE staff.
- Cameco revised the PDP and PDCE in response to CNSC and SMOE staff regulatory review comments and submitted a revised draft PDP and PDCE in 2024.

- Cameco proposed an increased amount to C\$295.8 million for decommissioning the Rabbit Lake Operation, up from C\$213.4 million.
- CNSC staff and SMOE have accepted the revised draft PDP and PDCE.
- Based on CNSC staffs' technical assessment of the information submitted by Cameco, CNSC staff prepared a proposed updated LCH and this CMD, including CNSC staff's conclusions and recommendations, for the Commission's consideration.

1.3 Overall Conclusions

CNSC staff concluded the revised PDP and PDCE for the Rabbit Lake Operation meets the criteria of CSA Group standard N294:19 *Decommissioning of facilities containing nuclear substances*, CNSC Regulatory Document [REGDOC-2.11.2 Decommissioning](#), and CNSC Regulatory Document [REGDOC-3.3.1, Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities](#).

With respect to paragraphs 24(4)(a) and (b) of the NSCA, CNSC staff conclude that the licensee:

- is qualified to carry on the activities authorized by the licence; and
- will, in carrying out that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.

1.4 Overall Recommendations

CNSC staff recommend the following to the Commission:

1. Accept CNSC staff conclusions that the Preliminary Decommissioning Cost Estimate accurately reflects the PDP;
2. accept the proposed revised amount of C\$295.8 million of the financial guarantee for the Rabbit Lake Operation; and,
3. direct Cameco Corporation to submit to the Commission, within 90 days of the publication of a decision, revised financial instruments.

2 Consultation and Engagement

2.1 Financial Guarantee

Under subsection 24(5) of the [NSCA](#), the licensee is required to provide a financial guarantee in a form that is acceptable to the Commission. The financial guarantee for decommissioning is

established to fund the activities described in the PDP. These requirements are found in [REGDOC-3.3.1, *Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities*](#) which is applicable to Rabbit Lake.

2.1.1 Discussion

Licensees are required to review and revise their financial guarantee every 5 years, or, when required by the Commission. The previous PDP and PDCE for the Rabbit Lake Operation were submitted in 2020.

The current financial guarantee will remain in effect until the Commission accepts the newly proposed financial guarantee.

As a financial instrument, Cameco is proposing to use Letters of Credit (LOC), which are valid financial instruments meeting the criteria of the CNSC REGDOC 3.3.1: *Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities*. Updated financial guarantee instruments LOC will be submitted by the licensee should the Commission accept the updated financial guarantee. As per the CNSC-SMOE MoU, the financial guarantee will be payable to SMOE.

As stated by Cameco in the PDP, the end state objective is to decommission and reclaim the site to an ecological and radiological condition that is as similar as is reasonably achievable to the pre-mining conditions at site, and suitable for traditional land use and eventual acceptance into [Saskatchewan's Institutional Control Program](#) (ICP).

The PDP outlines the following activities for the decommissioning of infrastructure at the Rabbit Lake Operation. This description is taken from the publicly available summary on Cameco's website:

- Eagle Point Mine facilities:
 - underground hazardous substances will be moved to surface for use or transported off-site for recycling or disposal in accordance with applicable regulations
 - the mine will be allowed to flood naturally
 - the access ramp will be sealed with clean waste rock
 - the ventilation air raises will be covered with engineered caps
- B-Zone Pond:
 - the B-Zone Pond will be reclaimed by removing the coffer dam which separates the B-Zone Pond from Wollaston Lake
- Ore and waste rock storage areas:

- mineralized waste rock stockpiles, the high carbonate low-grade ore pile and ore pads will be excavated, if required, and transported to the Rabbit Lake In-pit Tailings Management Facility (RLITMF) for disposal
- the West #5 waste rock pile will be covered with an engineered cover system and seeded to promote development of vegetation
- the Eagle Point waste rock pile will be used to backfill the Eagle Point Mine access ramp and for general Rabbit Lake decommissioning and reclamation activities
- Rabbit Lake In-Pit Tailings Management Facility:
 - frozen tailings within the facility will be thawed and the tailings allowed to consolidate
 - decommissioning waste will be placed in the facility
 - an engineered cover system will be put in place and seeded to promote development of vegetation
 - RLITMF water will be pumped and treated until consolidation of the tailings is complete
 - once consolidation of the tailings is complete, the groundwater levels surrounding the RLITMF will recover to natural levels
- Above-Ground Tailings Management Facility (AGTMF):
 - the AGTMF will be contoured to allow for surface drainage and covered with an engineered cover system and seeded to promote development of vegetation
- Surface buildings and facilities:
 - contaminated surface infrastructure will be dismantled and disposed of within the AGTMF or RLITMF
 - non-contaminated surface infrastructure will be disassembled and placed in the Rabbit Lake landfill
 - hazardous substances will be used in the decommissioning process or transported off-site for recycling or disposal in accordance with applicable regulations
- Site roads and borrow areas:
 - site roads and borrow areas will be decommissioned, contoured and seeded with native vegetation

Based on the above planned activities, Cameco has developed and updated their PDCE and increased the financial guarantee for the Rabbit Lake Operation from C\$213.4 million to C\$295.8 million. This increase is due to updated equipment, labour rates, materials and inflation.

2.1.2 Conclusion

CNSC staff's review concluded the PDP and PDCE, including the existing and proposed financial instruments, for the Rabbit Lake Operation:

- met the requirements of CSA Group standard, *Decommissioning of Facilities Containing Nuclear Substances*, N294:19
- met the requirements of CNSC Regulatory Document, REGDOC-2.11.2: *Decommissioning*
- met the requirements of CNSC Regulatory Document, REGDOC-3.3.1: *Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities*

CNSC staff concluded from their review of the PDP and PDCE that the proposed amount of C\$295.8 million is credible for decommissioning the Rabbit Lake Operation.

CNSC staff concluded that the licensee

- is qualified to carry on the activities authorized by the licence; and
- will, in carrying out that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.

2.2 Indigenous Consultation and Engagement

The common-law duty to consult with Indigenous Nations and communities applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The CNSC ensures that all of its licence decisions under the NSCA uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty rights pursuant to section 35 of the Constitution Act, 1982.

CNSC staff are committed to building long-term relationships with Indigenous Nations and communities who have an interest in CNSC-regulated facilities within their traditional and/or treaty territories. The CNSC's Indigenous engagement practices include sharing information, discussing topics of interest, seeking feedback and input on CNSC processes, and providing opportunities to participate in environmental monitoring. The CNSC also provides funding

support for Indigenous peoples to meaningfully participate in Commission proceedings and ongoing regulatory activities.

2.2.1 Discussion

The proposed revised PDP and PDCE do not change the operations, site characteristics or propose any new activities at the Rabbit Lake site. CNSC staff concluded that acceptance of Cameco's proposed financial guarantee will not lead to any new impacts to Indigenous or Treaty rights.

CNSC staff regularly engage with Indigenous Nations regarding their rights and interests in relation to the Rabbit Lake site and have established Terms of Reference for Long Term Engagement with the Ya' Thi Néné Land and Resource Office and English River First Nation and also have regular engagement activities with the Métis Nation-Saskatchewan and Kineepik Métis Local. CNSC staff have informed these Nations and communities of Cameco's financial guarantee submission and that CNSC staff are available to answer any questions about the review process.

2.2.2 Conclusion

As the financial guarantee submission will not lead to any new impacts on Indigenous or Treaty Rights, CNSC staff concluded that there was no trigger for Indigenous Consultation or engagement from this matter, however CNSC staff regularly engage with Indigenous Nations and communities regarding Cameco's Rabbit Lake Operation.

2.3 Public Consultation and Engagement

The NSCA mandates the CNSC to disseminate objective scientific, technical and regulatory information to the public concerning its activities and the activities it regulates. CNSC staff fulfill this mandate in a variety of ways, including hosting in-person and virtual information sessions and through annual regulatory reports.

2.3.1 Discussion

CNSC staff met with the Northern Saskatchewan Environmental Quality Committee (NSEQC) on June 5, 2024, December 5, 2024, as well as May 21, 2025. At each of these 3 meetings, CNSC staff gave a presentation that included information on the update to the Rabbit Lake financial guarantee. There were no concerns or recommendations raised during these sessions with respect to this matter.

2.3.2 Conclusion

CNSC staff concluded that there was no trigger for public consultation or engagement from this matter, however CNSC staff regularly engage with the public and members of Saskatchewan's Northern Administrative District regarding these sites.

2.4 Participant Funding Program

The CNSC established the Participant Funding Program (PFP) in 2011 to:

1. enhance individual, not-for-profit organization and Indigenous Nations and Communities participation in the CNSC's environmental assessment (EA) and licensing processes for major nuclear facilities (e.g., uranium mines, nuclear power plants, nuclear substance processing, or nuclear waste facilities)
2. assist individuals, not-for-profit organizations and Indigenous Nations and Communities to bring value-added information to the Commission through informed and topic-specific interventions related to EAs and licensing (i.e., new, distinctive and relevant information that contributes to a better understanding of the anticipated effects of a project)

There was no call for interventions and no participant funding granted for this submission.

3 Events and other matters of regulatory interest

3.1 Public Information and Disclosure Program

A Public Information and Disclosure Program (PIDP) is a regulatory requirement for licence applicants and licensees of Class I nuclear facilities, uranium mines and mills and certain Class II nuclear facilities. These requirements are found in REGDOC-3.2.1, *Public Information and Disclosure*.

The primary goal of the PIDP is to ensure that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated to the public. The program must include a commitment to, and protocol for ongoing, timely communication of information related to the licensed facility during the course of the licence period.

CNSC's expectations of a licensee's public information program and disclosure protocol are commensurate with the level of risk of the facility, as well as the level of public interest in the licensed activities. The program and protocol may be further influenced by the complexity of

the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities.

CNSC staff accepted Cameco's updated Rabbit Lake Operation PIDP as part of relicensing in 2024.

4 Conclusions

CNSC staff's review concluded that the PDP and PDCE for the Rabbit Lake Operation and associated financial guarantee instruments met all applicable requirements and are of a credible amount to decommission the site.

CNSC staff recommend the following to the Commission:

- accept CNSC staff conclusions that the Preliminary Decommissioning Cost Estimate accurately reflects the PDP;
- accept the proposed revised amount of the financial guarantee for the Rabbit Lake Operation (from C\$213.4 million to C\$295.8 million); and,
- direct Cameco Corporation to submit to the Commission, within 90 days of the publication of a decision, revised financial instruments.

5 References

1. *Rabbit Lake Operation, Preliminary Decommissioning Plan*, September 2025- - **Confidential and Proprietary**
2. *Rabbit Lake Operation: Preliminary Decommissioning Cost Estimate*, September 2025. - **Confidential and Proprietary**
3. Ashley Wagner (MOE) to Shawn Harriman (Cameco), re: *Rabbit Lake Operation, Preliminary Decommissioning Plan and Cost Estimate – Provincial acceptance*. (eDoc 7599410)
4. CSA N294:19 *Decommissioning of facilities containing nuclear substances*
5. *Memorandum of Understanding between the Atomic Energy Board and Saskatchewan Environment and Resource Management* May 2024.
6. Preliminary Decommissioning Plan - Summary - Rabbit Lake Operation.
https://www.cameco.com/sites/default/files/documents/Rabbit_Lake_PDP_Summary.pdf.
7. Institutional Control Program | Mineral Exploration and Mining | Government of Saskatchewan [Saskatchewan's Institutional Control Program](#).

6 Glossary

For definitions of terms used in this document, see [REGDOC-3.6, *Glossary of CNSC Terminology*](#), which includes terms and definitions used in the [Nuclear Safety and Control Act](#) and the [Regulations](#) made under it, and in [CNSC regulatory documents](#) and other publications.

Additional terms and acronyms used in this CMD are listed below.

CNSC	Canadian Nuclear Safety Commission
CMD	Commission Member Document
CSA	Canadian Standards Association
ICP	Institutional Control Program
LCH	Licence Conditions Handbook
MoU	Memorandum of Understanding
NSEQC	Northern Saskatchewan Environmental Quality Committee
NSCA	<i>Nuclear Safety and Control Act</i>
PDP	Preliminary Decommissioning Plan
PDCE	Preliminary Decommissioning Cost Estimate
REGDOC	CNSC Regulatory Document ⁴
RLO	Rabbit Lake Operation
SMOE	Saskatchewan Ministry of Environment

Appendix A: Basis for Recommendation(s)

A.1: Regulatory Basis

The recommendations presented in this CMD are based on compliance objectives and expectations associated with the relevant SCAs and other matters. The regulatory basis for the matters that are relevant to this CMD are as follows.

Nuclear Safety and Control Act

- Paragraphs 24(2)(a) and (b) of the *Nuclear Safety Control Act* provide that the Commission may issue, renew, suspend in whole or in part, amend, revoke or replace a licence, or authorize its transfer, on receipt of an application; (a) in the prescribed form; (b) containing the prescribed information and undertakings and accompanied by the prescribed documents.
- Subsection 24(5) of the *Nuclear Safety Control Act* provides that a licence may contain any term or condition that the Commission considers necessary for the purposes of this Act, including a condition that the applicant provide a financial guarantee in a form that is acceptable to the Commission.
- Subsection 24(6) of the *Nuclear Safety Control Act* provides that the Commission may authorize the application of the proceeds of any financial guarantee.

General Nuclear Safety and Control Regulations

- The [*General Nuclear Safety and Control Regulations*](#) requires under paragraph 3(1)(l) that a licence application contains a description of any proposed financial guarantee relating to the activity to be licensed.

Uranium Mines and Mills Regulations

- The [*Uranium Mines and Mills Regulations*](#) requires under subparagraph 3(a)(viii) the proposed plan for the decommissioning of the mine or mill.

A.2: Technical Basis

CNSC staff's recommendations to the Commission within this CMD are supported on a technical basis and comparison by the following documents, which are both sufficient and adequate: CSA Group standard N294:19, Decommissioning of facilities containing nuclear substances. CNSC Regulatory Document [REGDOC-2.11.2, Decommissioning](#).

CNSC Regulatory Document [REGDOC-3.3.1, Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities](#).

Appendix B: Current Licence – Rabbit Lake Operation



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

URANIUM MINE AND MILL LICENCE CAMECO CORPORATION RABBIT LAKE OPERATION

I) LICENCE NUMBER: UML-MINEMILL-RABBIT.00/2038

II) LICENSEE: Pursuant to section 24 of the *Nuclear Safety and Control Act*, this licence is issued to:

Cameco Corporation
2121 – 11th Street West
Saskatoon, Saskatchewan S7M 1J3
Corporate Number 332981-0

III) LICENCE PERIOD:

This licence is valid from November 1, 2023 to October 31, 2038, unless otherwise suspended, amended, revoked or replaced.

IV) LICENSED ACTIVITIES:

This licence authorizes the licensee to:

- a) prepare a site for, construct, operate, modify and decommission a nuclear facility (hereinafter “the facility”) for the mining of uranium ore and the production of uranium concentrate at a site known as the Rabbit Lake Operation in the Province of Saskatchewan as shown on the drawing referenced at Appendix A to this licence.
- b) mine a nuclear substance (uranium ore);
- c) produce a uranium concentrate;
- d) possess, transfer, import, use, store, and dispose of nuclear substances; and
- e) possess, transfer, import and use prescribed equipment that is required for or associated with laboratory studies, field studies, fixed gauge usage and borehole logging devices in relation to (a), (b) and (c).

V) EXPLANATORY NOTES:

- a) Nothing in this licence shall be construed to authorize non-compliance with any other applicable legal obligation or restriction.
- b) Unless otherwise provided for in this licence, words and expressions used in this licence have the same meaning as in the *Nuclear Safety and Control Act* and its associated Regulations.
- c) The UML-MINEMILL-RABBIT.00/2038 Licence Conditions Handbook (LCH) identifies the criteria that will be used by Canadian Nuclear Safety Commission staff to assess the licensee's compliance with the conditions listed in this licence. The LCH also provides information regarding delegation of authority and applicable version control of documents comprising verification criteria.

VI) CONDITIONS:

G. GENERAL

G.1 Licensing Basis for Licensed Activities

The licensee shall conduct the activities described in Part IV of this licence in accordance with the licensing basis, defined as:

- (i) the regulatory requirements set out in the applicable laws and regulations;
- (ii) the conditions and safety and control measures described in the facility's or activity's licence and the documents directly referenced in that licence;
- (iii) the safety and control measures described in the licence application and the documents needed to support that licence application;

unless otherwise approved in writing by the Canadian Nuclear Safety Commission (hereinafter "the Commission").

G.2 Notification of Changes

The licensee shall give written notification of changes to the facility or its operation, including deviation from design, operating conditions, policies, programs and methods referred to in the licensing basis.

G.3 Financial Guarantee

The licensee shall maintain a financial guarantee for decommissioning that is acceptable to the Commission.

G.4 Public Information and Disclosure

The licensee shall implement and maintain a public information and disclosure program.

1. MANAGEMENT SYSTEM

1.1 Management System

The licensee shall implement and maintain a management system.

2. HUMAN PERFORMANCE MANAGEMENT

2.1 Training Program

The licensee shall implement and maintain a training program.

3. OPERATING PERFORMANCE

3.1 Operations Program

The licensee shall implement and maintain an operating program, which includes a set of operating limits.

3.2 Reporting Requirements

The licensee shall implement and maintain a program for reporting to the Commission or a person authorized by the Commission.

3.3 Nuclear Substances and Radiation Devices

The licensee shall implement and maintain a program for nuclear substances and radiation devices.

4. SAFETY ANALYSIS

4.1 Safety Analysis Program

The licensee shall implement and maintain a safety analysis program.

5. *PHYSICAL DESIGN*

5.1 Design Program

The licensee shall implement and maintain a design program.

6. *FITNESS FOR SERVICE*

6.1 Fitness for Service Program

The licensee shall implement and maintain a fitness for service program.

7. *RADIATION PROTECTION*

7.1 Radiation Protection Program

The licensee shall implement and maintain a radiation protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

8. *CONVENTIONAL HEALTH AND SAFETY*

8.1 Conventional Health and Safety Program

The licensee shall implement and maintain a conventional health and safety program.

9. *ENVIRONMENTAL PROTECTION*

9.1 Environmental Protection Program

The licensee shall implement and maintain an environmental protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

10. EMERGENCY MANAGEMENT AND FIRE PROTECTION

10.1 Emergency Preparedness Program

The licensee shall implement and maintain an emergency preparedness program.

10.2 Fire Protection Program

The licensee shall implement and maintain a fire protection program.

11. WASTE MANAGEMENT

11.1 Waste Management Program

The licensee shall implement and maintain a waste management program.

11.2 Decommissioning Plan

The licensee shall maintain a decommissioning plan.

12. SECURITY

12.1 Security Program

The licensee shall implement and maintain a security program.

13. SAFEGUARDS AND NON-PROLIFERATION

13.1 Safeguards Program

The licensee shall implement and maintain a safeguards program.

14. PACKAGING AND TRANSPORT

14.1 Packaging and Transport Program

The licensee shall implement and maintain a packaging and transport program.

15. FACILITY SPECIFIC

15.1 Commissioning Report

The licensee shall submit a commissioning report to the Commission, or a person authorized by the Commission, in the event of a return to operations.

**Timothy
Berube**

Digitally signed by Timothy
Berube
Date: 2023.10.24 09:35:27
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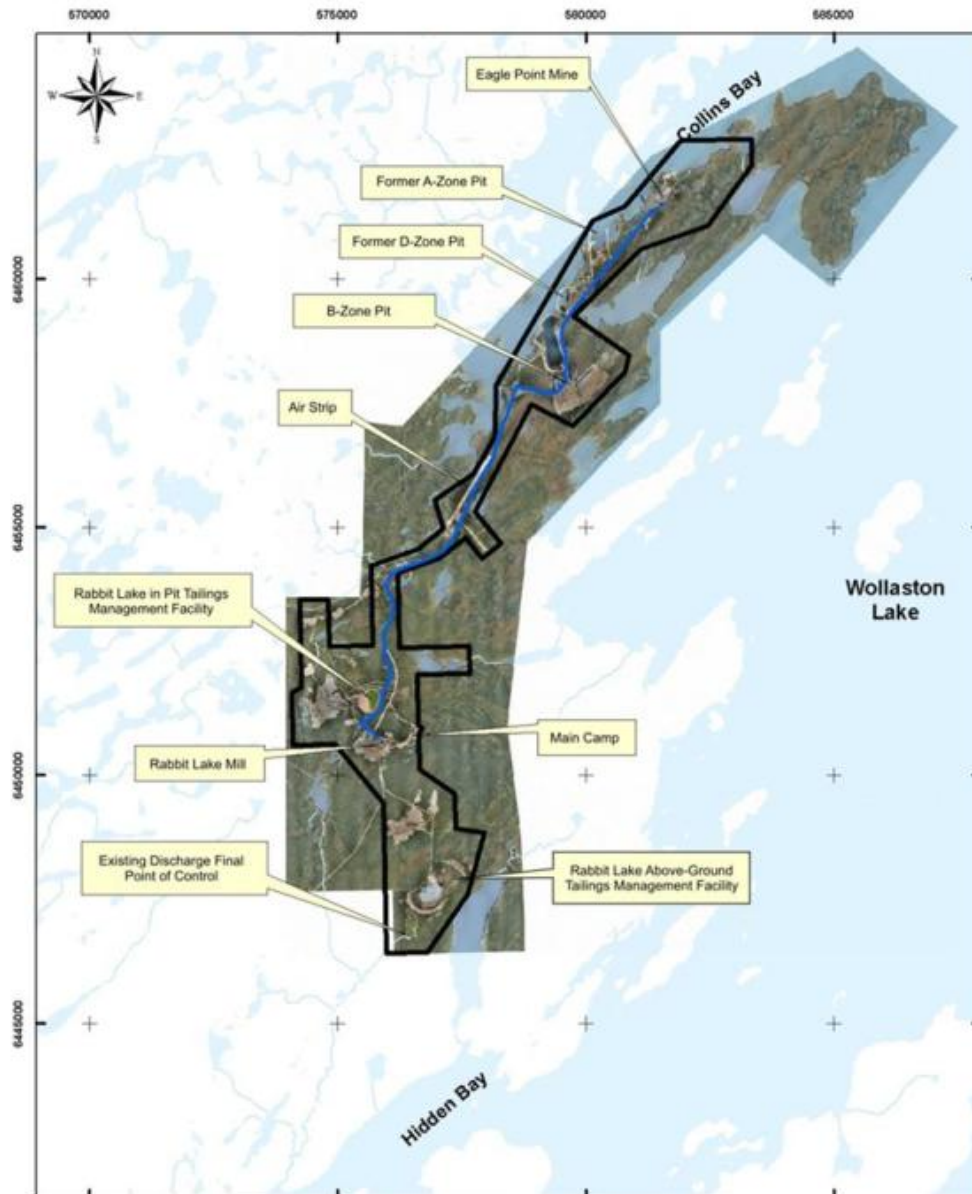
Date October 24, 2023

Dr. Timothy Berube, Acting President
on behalf of the Canadian Nuclear Safety Commission

APPENDIX A

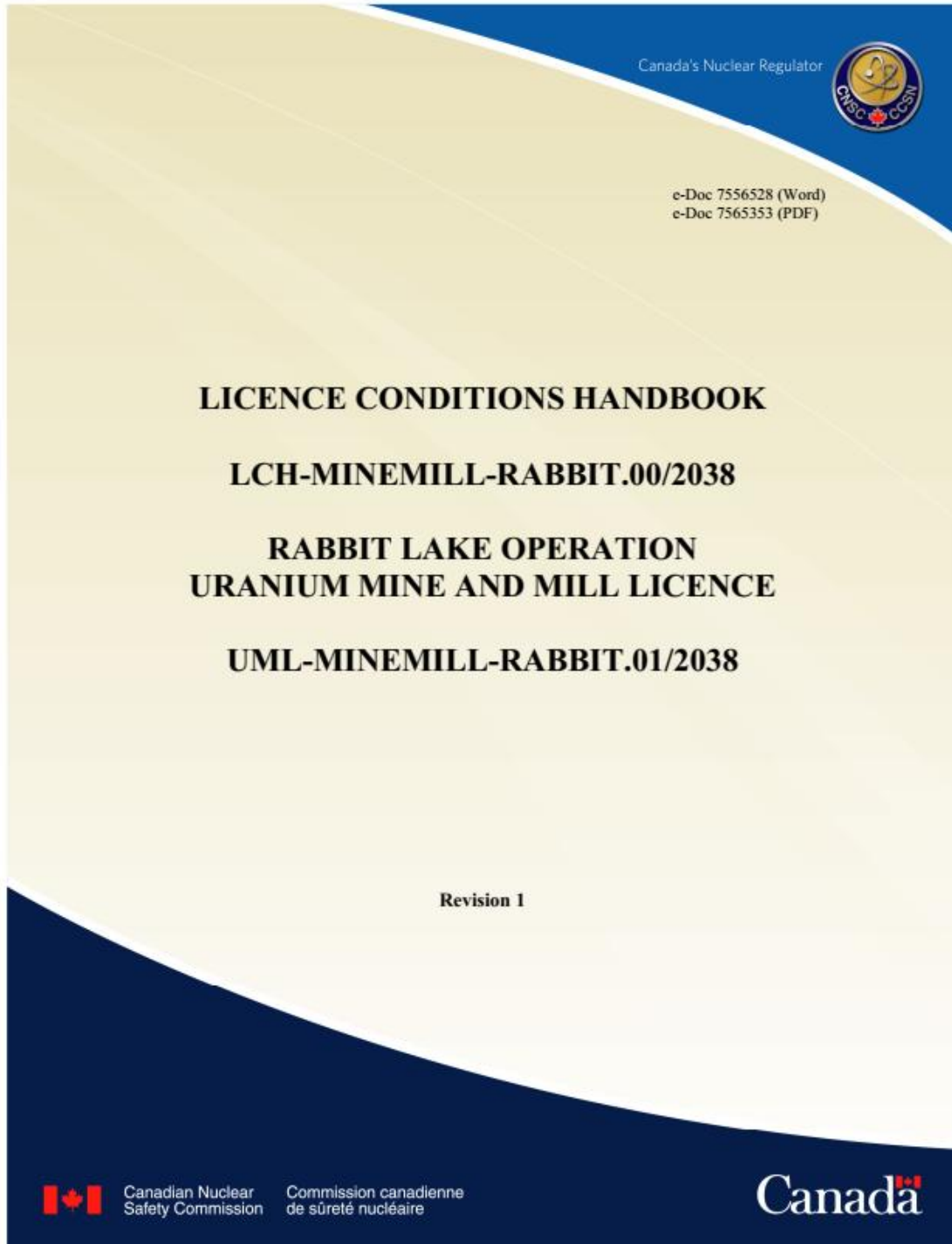
LOCATION OF CAMECO'S OPERATION AT RABBIT LAKE

The location of Cameco's Rabbit Lake Operation is provided on the following diagram.

Rabbit Lake Operation Location, Surface Lease Outline and Major Facilities
(courtesy Cameco Corporation)

e-Doc 7150941 (Word)
e-Doc 7150943 (PDF)

Appendix C: Draft Licence Conditions Handbook – Rabbit Lake Operation



Rabbit Lake Operation
Licence Conditions Handbook

Effective Date: September ??, 2025
LCH-MINEMILL-RABBIT.01/2038

Licence Conditions Handbook
LCH-MINEMILL-RABBIT.00/2038, Revision 0

Effective: September ??, 2025

Rabbit Lake Operation
Uranium Mine and Mill Licence
UML-MINEMILL-RABBIT.01/2038
(Effective: September ??, 2025)

SIGNED this ??-day September 2025

X

Patrick Burton
Director, Uranium Mines and Mills Division

Directorate of Nuclear Cycle and Facilities Regulation
CANADIAN NUCLEAR SAFETY COMMISSION

e-Doc 7556528 (Word)
e-Doc 7565353 (PDF)

Page ii

Rabbit Lake Operation
Licence Conditions Handbook

Effective Date: September ??, 2025
LCH-MINEMILL-RABBIT.01/2038

Revision History:

Effective Date	Revision	Section(s) changed	Description of the Changes	DCR e-DOC
	0	N/A	Original Document. Updated REGDOC listings, updated to reflect new licence and LCH number from LCH issued as part of past licence	
September ??, 2025	1	N/A	Original Document. Updated FG numbers to reflect revised values	6886583 (Word) 6954181 (PDF)

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PART I: INTRODUCTION

The purpose of the licence conditions handbook (LCH) is to identify and clarify the relevant parts of the licensing basis for each licence condition (LC). This will help ensure that the licensee will maintain facility operations in accordance with the licence and the intent of the licensing basis. The LCH also provides information regarding delegation of authority, document version control and conflict resolution. The LCH should be read in conjunction with the licence.

The LCH has 3 parts under each LC: the Preamble, Compliance Verification Criteria (CVC), and Guidance. The Preamble explains the regulatory context, background, and/or history related to the LC. CVC are used by Canadian Nuclear Safety Commission (CNSC) staff to oversee compliance with the LC. Guidance is non-mandatory information, including direction on how to comply with the LC.

The statement “a person authorized by the Commission” in the LCs or the LCH indicates that the Commission may delegate certain authority to CNSC staff. Unless otherwise specified, the delegation of authority by the Commission to act as a person authorized by the Commission (Delegated Officer) is only applied to incumbents in the following positions:

- Director, Uranium Mines and Mills Division
- Director General, Directorate of Nuclear Cycle and Facilities Regulation
- Executive Vice-President and Chief Regulatory Operations Officer, Regulatory Operations Branch

INTRODUCTION

PART II: FRAMEWORK FOR EACH CONDITION

1. G. GENERAL

G.1 Licensing Basis for Licensed Activities

The licensee shall conduct the activities described in Part IV of this licence in accordance with the licensing basis, defined as:

- (i) the regulatory requirements set out in the applicable laws and regulations;
- (ii) the conditions and safety and control measures described in the facility's or activity's licence and the documents directly referenced in that licence;
- (iii) the safety and control measures described in the licence application and the documents needed to support that licence application;

unless otherwise approved in writing by the Canadian Nuclear Safety Commission (hereafter "the Commission").

Preamble

Licence condition G.1 requires activities (defined in Part IV of the licence) be conducted in accordance with the licensing basis. Further information on the licensing basis is available in CNSC regulatory document, REGDOC-3.5.3 *Regulatory Fundamentals*.

The licensing basis, established by the Commission at the time the licence is issued, sets the boundary conditions for a regulated activity, and establishes the basis for the CNSC's compliance program for that regulated activity.

Part (i) of licence condition G.1 includes, but is not limited to, the following:

- *Nuclear Safety and Control Act*
- *General Nuclear Safety and Control Regulations*
- *Uranium Mines and Mills Regulations*
- *Radiation Protection Regulations*
- *Packaging and Transport of Nuclear Substances Regulations, 2015*
- *Nuclear Substances and Radiation Devices Regulations*
- *Metal and Diamond Mining Effluent Regulations*
- Canada/International Atomic Energy Agency (IAEA) Safeguards Agreements

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The safety and control measures mentioned under Parts (ii) and (iii) of licence condition G.1 have the potential to affect the health and safety of people, the environment, security or international obligations to which Canada agrees. These measures may be found in high-level programmatic documents but might also be found in lower level supporting documentation. Safety and control measures can also be found in licensing basis publications such as CNSC regulatory documents, CSA Group standards or licensee documentation submitted in support of a licence.

The CNSC licence authorizes Cameco Corporation (Cameco) to conduct the following undertakings at the Rabbit Lake Operation, for which the CNSC provides regulatory oversight:

- operation and changes to the Eagle Point underground mine, Rabbit Lake mill and associated site infrastructure, within the objective of the licensing basis, to a maximum output of 4.25 million kilograms of uranium per year*
- disposal of tailings in the in-pit tailings management facility
- operation of the above ground tailings management facility
- operation and changes to the dewatering and water management systems, including the water treatment plant
- storage of clean and mineralized waste rock
- handling and storage of hazardous materials and disposal of hazardous wastes
- possession, storage, transfer, importation, use of nuclear substances
- possession, transfer, importation, and use of radiation devices
- authorized decommissioning and reclamation activities

* Rabbit Lake has been in a state of care and maintenance since 2016. Before any transition from care and maintenance to operations at either the mine or the mill, Cameco is required to provide notification to the CNSC and demonstrate that all requirements are met as discussed under LC 15.1 of this LCH

The *Environmental Impact Statement for the Rabbit Lake Solution Processing Project* (January 2008, e-Doc 3209207) considered production of 6.5 million kilograms of uranium from the Rabbit Lake mill. Cameco is required to provide notification to the CNSC before increasing production rate above 4.25 million kilograms of uranium or processing new sources of ore so that it can be verified that the proposed activities meet CNSC requirements and remain within the licensing basis for the Rabbit Lake Operation.

Compliance Verification Criteria

Licensing Basis Documents

Licensing basis documents are listed in Appendix B and C in addition to tables under the most relevant LC. All “shall” or normative statements in licensing basis publications are considered CVC unless stated otherwise. If any “should” or informative statements in licensing basis publications are also considered CVC, this is provided under the most relevant LC.

In the event of any inconsistency between 2 elements of the licensing basis, the licensee shall consult CNSC staff to determine the approach to resolve the issue.

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For operational activities that are not in accordance with the licensing basis, the licensee shall take action as soon as practicable to return to a state that is compliant with the licensing basis, taking into account the risk significance of the situation. Reporting requirements are outlined in CNSC's REGDOC-3.1.2, *Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills* and discussed under LC 3.2 of this LCH.

Changes to documentation or activities that result in operational activities not being in accordance with the licensing basis must be approved by the Commission prior to implementation.

Guidance

When the licensee becomes aware that a proposed change or activity might not be in accordance with the licensing basis, it should first seek direction from CNSC staff regarding the potential acceptability of this change or activity. The licensee should take into account that certain types of proposed changes might require significant lead times before CNSC staff can make recommendations and/or the Commission can properly consider them. Guidance for notifications to the CNSC related to licensee changes are discussed under LC G.2.

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G.2 Notification of Changes

The licensee shall give written notification of changes to the facility or its operation, including deviation from design, operating conditions, policies, programs and methods referred to in the licensing basis.

Preamble

During the course of licensed activities, it is expected that the licensee may make changes to implement improvements or to address changes in operational needs. While making these changes, it is imperative the licensee remains within the bounds of the licensing basis.

Appendix B provides a list of licensee documents that require notification of change. CNSC staff track the current version of these licensee documents separate from the LCH, which can be found here: E-DOCS-#7415638-RLO LCH List of Licensee Documents that Require Notification of Change

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Changes to the design, operating conditions, policies, programs and methods that have the potential to be outside of the licensing basis require prior written notification to the CNSC. CNSC staff will confirm the change remains within the licensing basis and notify the licensee prior to implementation of the change by the licensee. The licensee shall allow sufficient time for the CNSC to review the change proportionate to its complexity and the importance of the safety and control measures being affected. Regular communication between the CNSC and the licensee should ensure review timelines are established prior to submission of prior written notification. It remains the responsibility of the licensee to ensure that the Rabbit Lake Operation continues to operate within the bounds of the licensing basis.

Prior written notification shall include:

- a description of the change
- the rationale for the change
- expected duration (if not a permanent change)
- an explanation from the licensee supporting the conclusion that the change remains in accordance with the licensing basis.

Ongoing regular communication shall be maintained between the CNSC and licensee.

Guidance

A list of criteria to determine if a change would be in accordance with the licensing basis is provided in Appendix A of CNSC process document *Overview of: Assessing licensee changes to documents or operations* (e-Doc 4055483).

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G.3 Financial Guarantee

The licensee shall maintain a financial guarantee for decommissioning that is acceptable to the Commission.

Preamble

The licensee is responsible for all costs of decommissioning at the facility. All such costs are included in the licensee's decommissioning cost estimates and are covered by the licensee's financial guarantee for decommissioning. The licensee's decommissioning cost estimate is provided in the facility's preliminary decommissioning plan. The facility's current financial guarantee is covered by specific financial instruments as listed below.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CSA Group	Decommissioning of Facilities Containing Nuclear Substances	N294-19
CNSC	Decommissioning	REDOC-2.11.2
CNSC	Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities	REGDOC-3.3.1

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Preliminary Decommissioning Plan	Yes
Cameco	Preliminary Decommissioning Cost Estimate	Yes
Cameco	RBC P982109C03028 (\$136,277,800.00)	Yes
Cameco	BNS S10009 285005 (\$62,022,200.00)	Yes
Cameco	BMO BMT04349110S (\$97,500,000.00)	Yes

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The financial guarantee for decommissioning the Rabbit Lake Operation shall be reviewed and revised by the licensee every 5 years; or when required by the Commission; or following a revision of the preliminary decommissioning plan that significantly impacts the financial guarantee. The Rabbit Lake Operation preliminary decommissioning plan and associated preliminary decommissioning cost estimate were submitted by Cameco in November 2024. These documents have been reviewed and meet regulatory requirements.

The licensee shall submit a written report to the Commission confirming that the financial instruments continue to meet the acceptance criteria of subsection 5.1 of REGDOC-3.3.1, *Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities*. Any change to the type of financial instrument requires prior notification to the CNSC. The licensee shall submit this report by the end of March of each year, or at any time as the Commission may request.

Guidance

There is no guidance provided for this licence condition.

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G.4 Public Information and Disclosure

The licensee shall implement and maintain a public information and disclosure program.

Preamble

The public information and disclosure program ensures that information related to the health and safety of persons and the environment and other issues associated with the lifecycle of the nuclear facility is effectively communicated to the public. In addition, the program shall include a commitment to and protocol for ongoing timely communications regarding emissions, effluent releases, unplanned events and other incidents and activities related to the licensed facility that may be of interest to the public.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Public Information and Disclosure*	REGDOC-3.2.1

* Cameco to post summaries of Environmental Risk Assessments on their website, rather than the entire document, in accordance with Cameco's June 4, 2020 letter to the CNSC (L. Mooney to H. Tadros, e-Doc 6318384) and Cameco's June 12, 2020 email (K. Nagy to R. Snider, e-Doc 6316951).

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Public Information Program	Yes

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Indigenous Engagement, Version 1.2	REGDOC-3.2.2

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1. MANAGEMENT SYSTEM

Licence Condition 1.1

The licensee shall implement and maintain a management system.

Preamble

The “management system” safety and control area covers the framework which establishes the processes and programs required to ensure an organization achieves its safety objectives, continuously monitors its performance against these objectives and fosters a healthy safety culture.

The management system must satisfy the requirements set out in the *Nuclear Safety and Control Act* (NSCA), regulations made pursuant to the NSCA, the licence and the measures necessary to ensure that safety is of paramount consideration in implementation of the management system. An adequately established and implemented management system provides the evidence that the licensing basis remains valid.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CSA Group	Management System Requirements for Nuclear Facilities (except sections identified under other license conditions)	N286-12
CNSC	Safety Culture	REGDOC-2.1.2

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Quality Management Program	Yes

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Management System	REGDOC-2.1.1

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2. HUMAN PERFORMANCE MANAGEMENT

Licence Condition 2.1

The licensee shall implement and maintain a training program.

Preamble

The “human performance management” safety and control area covers activities that enable effective human performance through the development and implementation of processes that ensure a sufficient number of licensee workers are in all relevant job areas and have the necessary knowledge, skills, procedures and tools in place to safely perform their duties.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Personnel Training	REGDOC-2.2.2

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Training and Development Program	Yes

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Human Factors	REGDOC-2.2.1

HUMAN PERFORMANCE MANAGEMENT

3. OPERATING PERFORMANCE

Licence Condition 3.1

The licensee shall implement and maintain an operating program, which includes a set of operating limits.

Preamble

The “operating performance” safety and control area includes an overall review of the conduct of the licensed activities and the activities that enable effective performance.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CSA Group	Management System Requirements for Nuclear Facilities	N286-12

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Quality Management Program	Yes
Cameco	Environmental Code of Practice (Appendix A of the Environmental Protection Program – Code of Practice)	Yes
Cameco	Radiation Protection Program (Radiation Code of Practice - Appendix C)	Yes
Cameco	Waste Management Program	Yes
Cameco	Eagle Point Mine Program	Yes
Cameco	Mill Operations Program	Yes

Guidance

There is no guidance provided for this licence condition.

OPERATING PERFORMANCE

Licence Condition 3.2

The licensee shall implement and maintain a program for reporting to the Commission or a person authorized by the Commission.

Preamble

This LC requires the licensee to implement and maintain a process for reporting information to the CNSC. This includes monitoring results, changes to facilities or approved activities, performance assessments and the occurrence of unusual events. Sections 29 and 30 of the *General Nuclear Safety and Control Regulations*, section 38 of the *Nuclear Substances and Radiation Devices Regulations* and section 16 of the *Radiation Protection Regulations* provides further insight into reportable events.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills*	REGDOC-3.1.2

* Modified reporting requirements for false alarms and Emergency Response Team (ERT) responses, where ERT activation is not directly related to the licensed activity, are described in a October 4, 2021 letter from CNSC to Cameco (P. Fundarek to K. Nagy, e-Doc 6653493).

The licensee shall report effluent concentrations that reach or exceed the discharge limits in the *Metal and Diamond Mining Effluent Regulations* in addition to requirements outlined in CNSC's REGDOC-3.1.2.

The licensee shall submit to the CNSC within 90 days after the end of each quarter of a calendar year, the results of the:

- radiation monitoring program
- environmental monitoring program

Results from the above monitoring programs are also to include quality assurance and quality control information. More frequent reporting may be requested on a case-by-case basis.

The licensee shall issue worker radiation dose records within 90 days after the end of each quarter of a calendar year, to:

- the worker
- the CNSC
- the National Dose Registry (NDR)

The licensee shall submit to the CNSC an annual compliance report by March 31 of each year, covering the operation for the 12-month period from January 1 to December 31 of the previous year.

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In accordance with the Record of Decision DEC 23-H7, In the Matter of Cameco Corporation Application to Renew the Uranium Mine and Mill Licence for the Rabbit Lake Operation, Saskatchewan, dated October 24, 2023 (e-doc 7144767), Cameco shall provide a comprehensive review and update to the Commission on the conduct of its licensed activities at the Rabbit Lake Operation at the mid-point of the licence period, i.e., in 2030. The update will also include information on the Environmental Risk Assessment (ERA), Preliminary Decommissioning Plan (PDP), Environmental Performance Review (EPR), and the impact of climate change on the licenced activities. This update will be made at a public proceeding to be conducted in the community in proximity to the Rabbit Lake Operation.

Guidance

Guidance Publications

Source	Document Title	CNSC e-Access Document Number
CNSC/SK	CNSC – Saskatchewan Harmonized Annual Reporting Requirements, August 2010	3678482

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Licence Condition 3.3

The licensee shall implement and maintain a program for nuclear substances and radiation devices.

Preamble

Licensees must ensure they receive CNSC approval before the import, possession, use, storage, transfer, or disposal of nuclear substances and radiation devices, except as specified in the tables for this section. It is the responsibility of the licensee to ensure that they have CNSC authorization for the import or export of any nuclear substances and radiation devices.

The possession limits for unsealed nuclear substances does not apply to natural uranium and its decay products which originate in the mining or ore-treatment streams.

It is also important to note that there is no possession limit on the number of sealed nuclear sources or radiation devices.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Licence Application Guide Nuclear Substances and Radiation Devices, version 2 (excluding section 2)	REGDOC-1.6.1

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Radiation Protection Program (Appendix B – Authorized Nuclear Substance List)	Yes

The authorized possession limits for unsealed nuclear substances are:

Nuclear Substance	Maximum Total Quantity in Possession
Radium-226	1 MBq
Barium-133	6 MBq

The maximum authorized quantity of nuclear substances per sealed source is:

Nuclear Substance	Maximum Quantity per Sealed Source
Americium-241/Curium-244/ Plutonium 239	7 kBq
Cesium-137	1.4 MBq
Bismuth-210/Lead-210	4.4 kBq
Polonium-210	3.7 MBq

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The authorized make and model of radiation devices and the maximum quantity of nuclear substance per each device are:

Radiation Device Make and Model	Nuclear Substance	Maximum Quantity per Radiation Device
VEGA Americas, Inc. SH-100; Previous manufacturer name: Ohmart/Vega	Cesium-137	3,700 MBq
VEGA Americas / Ohmart VEGA SR-1A	Cesium-137	9,250 MBq
VEGA Americas / Ohmart VEGA SH-F1B	Cesium-137	4,400 MBq
VEGA Americas / Ohmart VEGA SR-A	Cesium-137	3,700 MBq
VEGA Americas / Ohmart VEGA SH-F1A	Cesium-137	3,700 MBq
Thermo Fisher Scientific 5200 Previous manufacturer name: Thermo MeasureTech Canada Inc. / Texas Nuclear Corporation	Cesium-137	1,850 MBq

Note: Includes provision for replacement sources for these radiation devices.

The management of nuclear substances and radiation devices will be evaluated against:

- 3.3.1 A radioisotope safety poster approved by the Commission or a person authorized by the Commission, which corresponds to the classification of the area, room or enclosure, is posted in a readily visible location in areas, rooms or enclosures where these listed nuclear substances are handled.
- 3.3.2 When in storage, radioactive nuclear substances or radiation devices are accessible only to persons authorized by the licensee; the dose rate at any occupied location outside the storage area, room or enclosure resulting from the substances or devices in storage does not exceed 2.5 µSv/h and measures are in place to ensure that the dose limits in the *Radiation Protection Regulations* are not exceeded as a result of the substances or devices in storage.

Guidance

There is no guidance provided for this licence condition.

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4. SAFETY ANALYSIS

Licence Condition 4.1

The licensee shall implement and maintain a safety analysis program.

Preamble

The “safety analysis” safety and control area includes the systematic evaluation of the potential hazards associated with the proposed activity or facility and considers the effectiveness of preventative measures and strategies in reducing the effects of such hazards.

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Environmental Protection Program	Yes
Cameco	Waste Management Program	Yes
Cameco	Occupational Health and Safety Program	Yes

The safety analysis program will be evaluated against the following principles:

- 4.1.1 A process has been implemented and maintained to identify, assess, and eliminate or control health and safety and environmental risks associated with existing and new processes or changes to work procedures, equipment, organizational structure, staffing, products, services and suppliers.
- 4.1.2 Risks to health, safety and the environment have been identified, assessed, eliminated or controlled for existing and new processes or for changes to work procedures, equipment, organizational structure, staffing, products, services and suppliers.
- 4.1.3 Appropriate methodologies are used to identify potential hazards and consider the effectiveness of preventative measures and strategies in reducing the effects of such hazards.
- 4.1.4 Modeling is regularly updated using measured values to replace important assumptions and to increase the certainty of predicted long-term behaviour of contaminants.

Job hazard assessments conducted when planning non-routine and complex work activities are discussed under operating performance.

Guidance

Guidance Publications

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Source	Document Title	Document Number
CNSC	Safety Analysis for Class 1B Nuclear Facilities	REGDOC-2.4.4

* REGDOC not applicable to uranium mines and mills but added as guidance as there is information, such appendix C, which provides information on events that can be considered within a safety analysis program.

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5. PHYSICAL DESIGN

Licence Condition 5.1

The licensee shall implement and maintain a design program.

Preamble

The “physical design” safety and control area relates to activities that impact the ability of structures, systems and components to meet and maintain their design basis given new information arising over time and taking changes in the external environment into account.

The design basis is the range of conditions and events taken into account in the design of structures, systems and components of a facility according to established criteria, such that the facility can withstand them without exceeding authorized limits for the planned operation of safety systems.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Design of Uranium Mines and Mills: Ventilation Systems*	REGDOC-2.5.4
CSA Group	Management System Requirements for Nuclear Facilities	N286-12

* Applicable when applying for a CNSC licence to prepare a site for and construct, operate or decommission a uranium mine or mill.

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Eagle Point Mine Program	Yes
Cameco	Mill Operations Program	Yes
Cameco	Quality Management Program	Yes

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	General Design Considerations: Human Factors	REGDOC-2.5.1

PHYSICAL DESIGN

6. FITNESS FOR SERVICE

Licence Condition 6.1

The licensee shall implement and maintain a fitness for service program.

Preamble

The “fitness for service” safety and control area covers activities that impact the physical condition of structures, systems and components to ensure that they remain effective over time. This area includes programs that ensure equipment is available to perform its intended design function when called upon to do so.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CSA Group	Management System Requirements for Nuclear Facilities	N286-12

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Maintenance Program	Yes

The fitness for service program will also be assessed against:

- 6.1.1 Systems, equipment, and devices are maintained in good working order such that they can perform their design function.
- 6.1.2 Instruments, controls and associated indicators are maintained operational and in calibration. Method and interval of calibrations are defined, and records of calibrations are kept.
- 6.1.3 Preventative and corrective maintenance processes and systems have been implemented and are maintained.
- 6.1.4 Regular inspection and testing of critical infrastructure and equipment are carried out.
- 6.1.5 A process has been implemented to identify, plan and schedule maintenance activities.
- 6.1.6 Maintenance, testing, surveillance and inspection backlogs are monitored and minimized.

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- 6.1.7 Methods are used to show the current acceptance and operating status, and to prevent the use of systems, equipment or devices that are inaccurate, uncalibrated or not in working order.
- 6.1.8 When deviations beyond accuracy limits are found or suspected, their consequence on past results, and on present performance is evaluated.
- 6.1.9 A process exists to verify that changes to calibration, testing and maintenance requirements due to system and equipment modifications and replacements are implemented.

Guidance

There is no guidance provided for this licence condition.

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7. RADIATION PROTECTION

Licence Condition 7.1

The licensee shall implement and maintain a radiation protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

Preamble

The “radiation protection” safety and control area covers the implementation of a radiation protection program in accordance with the *Radiation Protection Regulations*. This program must ensure that contamination and radiation doses received are monitored, controlled, kept as low as reasonably achievable (ALARA), with social and economic factors being taken into account.

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Radiation Protection Program	Yes

The radiation protection (RP) program will be assessed against the following principles:

- 7.1.1 Radiological conditions are monitored, and sources of internal and external radiation exposures are controlled. Access and work in radiological areas are controlled so that collective and individual radiation exposures are kept in accordance with the ALARA principle.
- 7.1.2 RP instrumentation and equipment are calibrated, maintained and used so that radiation levels are accurately determined. Uncalibrated equipment is removed from use.
- 7.1.3 The personal dosimetry program ensures that external and internal radiation doses to individuals are accurately determined and recorded.
- 7.1.4 Appropriate contamination control measures are implemented to control and minimize the contamination of areas, equipment and personnel.
- 7.1.5 Effective decontamination control measures are implemented to control and prevent the contamination of areas, equipment and personnel.

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Action levels (AL) are designed to alert licensees before regulatory dose limits are reached. By definition, if an AL referred to in a licence is reached, a loss of control of some part of the associated RP program may have occurred and specific action is required, as defined in the *Radiation Protection Regulations*, the licence and the applicable code of practice.

Action Level	Dose (mSv)
Weekly Action Level	1
Quarterly Action Level	5

The weekly AL is assessed against official dosimetry results or engineering monitoring data. The quarterly AL is assessed against official dosimetry results. The licensee is expected to review and, if necessary, revise the ALs specified above at least once every 5 years in order to validate their effectiveness. The results of such reviews should be provided to the CNSC.

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Radiation Protection	REGDOC-2.7.1
CNSC	Dosimetry, Volume I: Ascertaining Occupational Dose	REGDOC-2.7.2
CNSC	Preparing Codes of Practice to Control Radiation Doses at Uranium Mines and Mills	G-218

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8. CONVENTIONAL HEALTH AND SAFETY

Licence Condition 8.1

The licensee shall implement and maintain a conventional health and safety program.

Preamble

The “conventional health and safety” safety and control area covers the implementation of a program to manage workplace safety hazards and to protect personnel and equipment.

The regulation of non-radiological health and safety at uranium mines and mills is governed by the *Canada Labour Code Part II*, which is administered by Employment and Social Development Canada (ESDC). However, the *Saskatchewan Uranium Mines and Mills Exclusion Regulations* (SOR/2001-115) defer the regulation of occupational health and safety in Saskatchewan uranium mines and mills to the province of Saskatchewan in accordance with the requirements of *The Mines Regulations, 2018 Part II Revised Regulations of Saskatchewan*.

The CNSC also has regulatory responsibilities for the oversight of the protection of the health and safety of workers. The CNSC harmonizes the oversight of conventional health and safety with the Saskatchewan Ministry of Labour Relations and Workplace Safety.

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Source	Document Title	Notification Requirements
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Occupational Health and Safety Program	Yes

The conventional health and safety program will be assessed against the following principles:

- 8.1.1 Housekeeping standards have been identified and are enforced to ensure that work areas are kept clean and organized.
- 8.1.2 Facilities, processes and procedures have been implemented to ensure the safe management of hazardous materials.
- 8.1.3 Employees and contractors actively participate in the management of conventional health and safety.
- 8.1.4 Management verifies that employees and contractors actively participate in the management of health and safety in their workplace.
- 8.1.5 A process has been established and maintained to monitor, measure and record conventional health and safety performance and the effectiveness of the occupational health and safety program on a regular basis.

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- 8.1.6 Routine inspections are performed by workers, supervisors, senior staff and/or safety professionals to identify any potential safety issues.
- 8.1.7 Processes and procedures are established and maintained to investigate accidents and incidents, to identify root causes, to implement corrective actions and to verify that corrective actions have been completed and will effectively prevent recurrence.
- 8.1.8 Procedures have been implemented and maintained for reporting work-related injuries, illnesses, fatalities and conventional health and safety incidents including near misses.
- 8.1.9 The causes of injuries are investigated, corrective actions implemented, and the effectiveness of corrective actions verified.
- 8.1.10 A preventative and corrective action procedure has been established and maintained to address non-conformances and inadequately controlled risks.

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Conventional Health and Safety	REGDOC-2.8.1
CSA Group	Selection, use and care of respirators	Z94.4-11

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9. ENVIRONMENTAL PROTECTION

Licence Condition 9.1

The licensee shall implement and maintain an environmental protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

Preamble

The “environmental protection” safety and control area covers programs that identify, control and monitor all releases of radioactive and hazardous substances and effects on the environment from facilities or as the result of licensed activities.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Environmental Protection: Environmental Principles, Assessments and Protection Measures, version 1.2	REGDOC-2.9.1
CSA Group	Environmental Management of Nuclear Facilities: Common requirements of the CSA N288 series of Standards, 2022	N288.0:22
CSA Group	Environmental Monitoring Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.4-19
CSA Group	Effluent Monitoring Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.5-22
CSA Group	Environmental Risk Assessments at Class I Nuclear Facilities and Uranium Mines and Mills	N288.6-22
CSA Group	Groundwater Protection Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.7-15
CSA Group	Establishing and Implementing Action Levels for Releases to the Environment from Nuclear Facilities	N288.8-17

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Licence Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Environmental Protection Program (Appendix A – Environmental Code of Practice)	Yes
Cameco	Waste Management Program	Yes
Cameco	Quality Management Program	Yes
Cameco	Environmental Risk Assessment, 2020*	Yes

*Note that CNSC staff have accepted Cameco's request to delay the update of their Rabbit Lake ERA by a year, to 2026 (e-Doc# 7464027)

To ensure the applicable environmental protection measures have been established, implemented and maintained, the environmental protection program will also be assessed against:

- 9.1.1 Action levels specified in the environmental code of practice. When the licensee becomes aware that an action level has been triggered, the licensee shall notify the Commission within 24 hours and take specific action as defined in the *Uranium Mines and Mills Regulations* and the environmental code of practice.
- 9.1.2 The authorized release limits as specified below. When the licensee becomes aware that an authorized release limit has been reached or exceeded, the licensee shall immediately notify the Commission, investigate, and take corrective action to ensure that the releases are maintained below the authorized release limits.

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The authorized liquid effluent release limits are:

Deleterious Substance	Maximum Authorized Monthly Mean Concentration	Maximum Authorized Concentration in a Composite Sample	Maximum Authorized Concentration in a Grab Sample
Arsenic (mg/L)	0.30	0.45	0.60
Copper (mg/L)	0.30	0.45	0.60
Lead (mg/L)	0.10	0.15	0.20
Nickel (mg/L)	0.50	0.75	1.00
Zinc (mg/L)	0.50	0.75	1.00
Un-ionized Ammonia (mg/L)	0.50	N/A	1.00
Total Suspended Solids (mg/L)	15.00	22.50	30.00
Radium-226 (Bq/L)	0.37	0.74	1.11
Acid balance (as H ₃ O ⁺) reported as pH	In a range of 6.0 to 9.5		
Acutely Lethal Effluent	0%		

Notes:

- 1) Authorized release limits have been harmonized, where available, with those required under the *Metal and Diamond Mining Effluent Regulations* (MDMER).
- 2) Definition of Units: mg/L = milligrams per litre
Bq/L = becquerels per litre
- 3) All concentrations and activities are total values.
- 4) “Monthly mean concentration” means the average value of the concentrations measured in all composite or grab samples collected from the final discharge point during each month when a deleterious substance is deposited.
- 5) “Composite sample” means:
 - (a) a quantity of effluent consisting of not less than three equal volumes or three volumes proportionate to flow that have been collected at approximately equal time intervals over a period of not less than seven hours and not more than 24 hours; or
 - (b) a quantity of effluent collected continuously at a constant rate or at a rate proportionate to the rate of flow of the effluent over a sampling period of not less than seven hours and not more than 24 hours.
- 6) “Grab sample” means a quantity of undiluted effluent collected at any given time.

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- 7) “*Acutely lethal*” (*Source MDMER*), in respect of an effluent, means that the effluent at 100 percent concentration kills
- a) more than 50 percent of the rainbow trout subjected to it for a period of 96 hours, when tested in accordance with the acute lethality test set out in section 14.1;
 - b) more than 50 percent of the three spine stickleback subjected to it for a period of 96 hours, when tested in accordance with the acute lethality test set out in section 14.2; or
 - c) more than 50 percent of the *Daphnia magna* subjected to it for a period of 48 hours, when tested in accordance with the acute lethality test set out in section 14.3. (*léthalité aiguë*)

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Controlling Releases to the Environment	REGDOC-2.9.2*
CSA Group	Environmental Management Systems – Requirements with Guidance for Use	ISO 14001:2015

*Cameco’s implementation of REGDOC-2.9.2 is tied to the cyclical updates of Cameco’s Environmental Risk Assessments (ERA). The current timeline for submission of the next cyclical ERA update for Rabbit Lake Operations is the end of 2026 (eDoc# 7468473)

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10. EMERGENCY MANAGEMENT AND FIRE PROTECTION

Licence Condition 10.1

The licensee shall implement and maintain an emergency preparedness program.

Preamble

The “emergency management and fire protection” safety and control area covers emergency plans and emergency preparedness programs which exist for emergencies and for non-routine conditions. It also includes any results of exercise participation.

Licensees are required to continually maintain and enhance their emergency management programs.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Nuclear Emergency Preparedness and Response*	REGDOC-2.10.1

* Off-site reporting timelines accepted by CNSC staff for Saskatchewan uranium mine and mill sites are described in January 30, 2020 letter from Cameco to the CNSC (L. Mooney to H. Tadros, e-Doc 6109667).

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Emergency Preparedness and Response Program	Yes

The emergency management and fire protection program will be assessed against the following principles:

- 10.1.1 Potential emergency situations are identified.
- 10.1.2 Pre-incident plans for response to emergencies are developed and are maintained.
- 10.1.3 Resources, including facilities and equipment required to respond to emergencies are identified and maintained.
- 10.1.4 Emergency communication protocols are established and understood.
- 10.1.5 Organization and responsibilities are identified.
- 10.1.6 Workers are trained to fulfill duties and responsibilities with respect to emergency management and fire plans and procedures.

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- 10.1.7 Procedures are implemented and maintained to prevent, prepare for, and respond to emergencies.
- 10.1.8 Response plans are periodically tested.

Guidance

There is no guidance provided for this licence condition.

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Licence Condition 10.2

The licensee shall implement and maintain a fire protection program.

Preamble

Licensees are required to implement and maintain a fire protection program (a set of planned, coordinated, controlled and documented activities) to ensure that the licensed activities do not result in an unreasonable risk to the health and safety of persons and to the environment due to fire and to ensure that the licensee is able to efficiently and effectively respond to emergency fire situations.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
NRC	National Building Code of Canada (2020)*	N/A
NRC	National Fire Code of Canada (2020)*	N/A
CSA Group	Fire Protection for Facilities that Process, Handle, or Store Nuclear Substances**	N393-13

* The National Building Code (NBC) and National Fire Code (NFC) are adopted by the province of Saskatchewan as the minimum standard for construction and renovation of buildings throughout the province. As of January 1, 2024, the 2020 versions of the NBC and NFC are adopted for use throughout Saskatchewan, subject to exclusions and/or amendments as contained in *The Building Code Regulations* and *The Fire Safety Regulations*. Cameco is required to comply with the most recent versions of the NBC and NFC as adopted by the province of Saskatchewan.

** Cameco's original implementation date of December 31, 2023 was not met. CNSC staff and Cameco are working to establish a new implementation date for this standard and have also agreed to work towards being compliant with N393-22. CSA N393-13 references the 2010 versions of the National Building Code of Canada and the National Fire Code of Canada, while CSA N393-22 references the 2020 versions of those codes and Cameco also intends to be compliant with the 2020 version of these codes.

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Fire Protection Program	Yes

Guidance

There is no guidance provided for this licence condition.

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11. WASTE MANAGEMENT

Licence Condition 11.1

The licensee shall implement and maintain a waste management program.

Preamble

The “waste management” safety and control area covers internal waste-related programs that form part of the facility’s operations up to the point where the waste is removed from the facility to a separate waste management facility.

Waste management facilities at the Rabbit Lake Operation include:

- storage areas for mineralized (special) waste rock and ore
- clean waste rock and overburden piles
- water treatment plant - dewatering collection, contaminated water handling and storage, mill effluent treatment and discharge
- In-Pit Tailings Management Facility
- Above-Ground Tailings Management Facility with contaminated waste disposal
- contaminated industrial waste storage
- storage and recycling facilities for hazardous wastes
- landfill for uncontaminated industrial and domestic waste
- domestic sewage treatment

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CNSC	Waste Management, Volume I: Management of Radioactive Waste	REGDOC-2.11.1
CNSC	Waste Management, Volume II: Management of Uranium Mine Waste Rock and Mill Tailings*	REGDOC-2.11.1

* Applicable to new uranium mine or mill projects and/or to new waste management facilities at existing uranium mines and mills.

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Waste Management Program	Yes

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The waste management program will be assessed against the following principles:

- 11.1.1 A radioactive waste management program is implemented to control and minimize the volume of radioactive waste.
- 11.1.2 The volume of waste is minimized by applying the “reduce, reuse, recycle and recover” principle.
- 11.1.3 Work is carried out in a manner that minimizes waste and prevents pollution.
- 11.1.4 Waste is stored or disposed of in the appropriate manner.
- 11.1.5 Wastes are managed in a manner that does not compromise reclamation or decommissioning plans.
- 11.1.6 The effectiveness of waste management practices is monitored, measured and recorded on a regular basis.
- 11.1.7 Routine inspections are performed to identify any potential waste management issues and to verify the condition of containment structures and waste management facilities.
- 11.1.8 The safety of embankments/dams is inspected and evaluated.
- 11.1.9 Records are kept of the quantities and types of waste generated and the method of disposal or management.
- 11.1.10 Wastes are managed to control the present and future releases of contaminants to the environment.
- 11.1.11 Surface water is managed to prevent or minimize the volume that is contaminated.

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Waste Management, Volume III: Safety Case for the Disposal of Radioactive Waste, Version 2	REGDOC-2.11.1
Canadian Dam Association	Canadian Dam Association, Canadian Dam Safety Guidelines	N/A

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Licence Condition 11.2

The licensee shall maintain a decommissioning plan.

Preamble

This LC requires that the licensee maintain a preliminary decommissioning plan (PDP).

A PDP provides an overview of the proposed decommissioning approach that is sufficiently detailed to assure that the proposed approach is, in the light of existing knowledge, technically and financially feasible, and appropriate in the interests of health, safety, security and the protection of the environment. The PDP defines areas to be decommissioned and the general structure and sequence of the principal work packages. The PDP forms the basis for establishing and maintaining a financial arrangement (financial guarantee) that will assure adequate funding of the decommissioning plan.

Compliance Verification Criteria

Licensing Basis Publications

Source	Document Title	Document Number
CSA Group	Decommissioning of Facilities Containing Nuclear Substances	N294-19
CNSC	Decommissioning	REDOC-2.11.2
CNSC	Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities	REGDOC-3.3.1

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Preliminary Decommissioning Plan	Yes
Cameco	Preliminary Decommissioning Cost Estimate	Yes

The PDP is to be revised at a minimum every 5 years or when required by the Commission; however, is to be kept current to reflect any changes in the site or nuclear facility

Guidance

There is no guidance provided for this licence condition.

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12. SECURITY

Licence Condition 12.1

The licensee shall implement and maintain a security program.

Preamble

The “security” safety and control area covers the programs required to implement and support the security requirements stipulated in the regulations, the licence, orders, or expectations for the facility or activity.

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Security Program	Yes

The security program will be assessed against the following principles:

- 12.1.1 The security program addresses the risks identified in an industrial security threat and risk assessment.
- 12.1.2 Measures are implemented and maintained to prevent the loss of nuclear substances or prevent acts of sabotage at the facility.
- 12.1.3 Measures are taken to prevent unauthorized access to the mining facility and to areas within the facility where nuclear substances are stored.
- 12.1.4 The industrial security threat and risk assessment is periodically reviewed and updated.

Guidance

Guidance Publications

Source	Document Title	Document Number
CNSC	Security of Nuclear Substances: Sealed Sources and Category I, II and III Nuclear Material, Version 2.1	REGDOC-2.12.3

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13. SAFEGUARDS AND NON-PROLIFERATION

Licence Condition 13.1

The licensee shall implement and maintain a safeguards program.

Preamble

The “safeguards and non-proliferation” safety and control area covers the programs and activities required for the successful implementation of the obligations arising from the Canada/International Atomic Energy Agency (IAEA) safeguards agreements, as well as all other measures arising from the *Treaty on the Non-Proliferation of Nuclear Weapons*.

Compliance Verification Criteria

Source	Document Title	Document Number
CNSC	Safeguards and Nuclear Material Accountancy	REGDOC-2.13.1

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Security Program	Yes

The safeguards and non-proliferation program will be assessed against CNSC’s REGDOC-2.13.1, *Safeguards and Nuclear Material Accountancy*, and the following principles:

- 13.1.1 Reasonable services and assistance are provided to the IAEA to enable the IAEA to carry out its duties and functions.
- 13.1.2 Prompt access to all locations at the facility is granted to the IAEA at all reasonable times where such access is required for the purposes of carrying on an activity pursuant to a safeguards agreement. Health and safety services and escorts are provided as required in order to facilitate activities.
- 13.1.3 Records that must be kept or any reports that are required to be made under a safeguards agreement are disclosed to the CNSC and the IAEA.
- 13.1.4 Reasonable assistance is provided to the IAEA to enable sampling and removal or shipment of samples.
- 13.1.5 Reasonable assistance is provided to the IAEA to enable measurements, tests and removal or shipment of equipment.

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- 13.1.6 Measures are implemented to prevent damage to, or the theft, loss or sabotage of samples collected pursuant to a safeguards agreement or the illegal use, possession or removal of such samples.
- 13.1.7 Reports and information, that is required to facilitate Canada's compliance with any applicable safeguards agreement, is provided to the Commission.

Guidance

There is no guidance provided for this licence condition.

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14. PACKAGING AND TRANSPORT

Licence Condition 14.1

The licensee shall implement and maintain a packaging and transport program.

Preamble

The “packaging and transport” safety and control area covers the safe packaging and transport of nuclear substances and radiation devices to and from the licensed facility.

Every person who transports radioactive material, or requires it to be transported, shall act in accordance with the requirements of Transport Canada’s *Transportation of Dangerous Goods Regulations* and the *Packaging and Transport of Nuclear Substances Regulations, 2015*.

The *Packaging and Transport of Nuclear Substances Regulations, 2015* and the *Transportation of Dangerous Goods Regulations* provides specific requirements for the design of transport packages, the packaging, marking and labeling of packages and the handling and transport of nuclear substances.

Compliance Verification Criteria

Licence Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Transportation Program	Yes

The licensee shall implement and maintain a packaging and transport program that will ensure compliance with the requirements set out in the *Transportation of Dangerous Goods Regulations* and in the *Packaging and Transport of Nuclear Substances Regulations, 2015*.

Guidance

There is no guidance provided for this licence condition.

PACKAGING AND TRANSPORT

15. FACILITY SPECIFIC

Licence Condition 15.1

The licensee shall submit a commissioning report to the Commission, or a person authorized by the Commission, in the event of a return to operations.

Preamble

Rabbit Lake has been in a state of care and maintenance since 2016. Licence condition 15.1 is meant to ensure that any transition from the current state of care and maintenance to operations at either the mine or the mill or both will take place within the framework of the NSCA, its regulations and the existing facility licence. This will include a formal review of the supporting documents listed below in 15.1.1, 15.1.2, 15.1.3 and 15.1.4.

Compliance Verification Criteria

Licensee Documents that Require Notification of Change

Source	Document Title	Prior Notification Required
Cameco	Mining Facility Licensing Manual	Yes
Cameco	Public Information Program	Yes
Cameco	Eagle Point Mine Program	Yes
Cameco	Mill Operations Program	Yes

The Commission, or a person authorized by the Commission, will confirm that an acceptable commissioning plan has been submitted prior to authorizing Cameco to return to operations from being in a care and maintenance state. Upon review and acceptance of the commissioning report, a person authorized by the Commission (as listed in delegation of authority in Part I, Introduction), will provide formal notification that Cameco is authorized to return to operations if the following conditions are met:

At least 9 months prior to the planned restart of operations at either the Rabbit Lake mine or the Rabbit Lake mill, Cameco shall supply:

- 15.1.1 A complete description and schedule for proposed commissioning and evaluation activities, including but not limited to integrity of equipment, and structures etc.
- 15.1.2 A list of all safety-significant roles during restart and subsequent operations, and before undertaking start-up, demonstration that there are sufficient numbers of qualified staff present for all safety-significant roles, including current training records for all operational staff as well training records of on-boarding of new staff.
- 15.1.3 Demonstration of measures to ensure conventional health and safety, radiation protection, and environmental protection during commissioning and production, and an ERA (completed in accordance with CSA N288.6) that incorporates commissioning and production.

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- 15.1.4 The engagement plan associated with restart to ensure the sufficient engagement of indigenous nations and communities as well as other interested parties.

Guidance

There is no guidance provided for this licence condition.

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APPENDIX A CHANGE CONTROL PROCESS

A.1 Change Control Process

A change control process is applied to the LCH to ensure that:

- preparation and use of the LCH are properly controlled
- all referenced documents are correctly identified and maintained
- procedures for modifying the LCH are followed.

A request to change this LCH can be initiated by either CNSC staff or the licensee. The licensee will be consulted on any changes to the LCH that are proposed by CNSC staff.

CNSC staff will take the following steps to update the LCH:

1. the CNSC receives or initiates written notification of proposed change
2. initiate a change request using the Change Request Form
3. complete a technical review of the proposed change, if required
4. consult the licensee and in case of disagreement on the proposed change, the dispute resolution process outlined in section A.3 will apply
5. obtain consent and signature from a Delegated Officer
6. update the LCH in accordance with the Change Request Form and send the updated document to the parties identified on the distribution list (section A.5).

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Change Request Form

1. GENERAL INFORMATION			
File Plan #		e-Doc #(s) for Change Request Form	
Licensee	Licence Number	LCH #, Rev/Version	Request Date
Licensing Officer			
2. CHANGE(S) TO THE LCH			
#	Description and Purpose	Proposed Change	References
1	<initiator, nature, reason for change, e.g. administrative, change to a licensee doc, etc.>	<identify modifications, such as by track changes, highlighting, etc.>	<LC, page, section #, etc.>
2			
3. ASSESSMENT (text and/or e-Doc #s)			
#	Division/Org	Comment	Disposition
1	<division>		
	<division>		
	<licensee>		
	<division>		
2	etc.		
4. CONSENT TO MODIFY			
#	Agreed	Comment	
1			
2			
Name		Title	Signature
5. LCH DOCUMENTATION AND DISTRIBUTION			
New LCH Number		LCH Effective Date	e-Doc # (include version number)
CNSC Outgoing Notification			Date Sent

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A.2 Review Criteria for Proposed Changes to Licensing Basis Documents

The licensee must provide the CNSC with written notification of a proposed significant change to key licensee documents before the licensee implements the change. The notification must be accompanied by sufficient information to demonstrate that the change is within the intent of the licensing basis. Written notification of minor or administrative changes may be made in batches after the changes have been implemented.

The following criteria will be used by CNSC staff to determine if the proposed change is acceptable:

1. The submission includes the appropriate level and quality of information with regards to:
 - a) The description of the proposed change including:
 - a summary of the change, including the purpose or need for the change
 - a preliminary finding of whether this proposal or notification is required under the NSCA, a regulation made under the Act or the licence, or has implications under the *Impact Assessment Act*, or whether a licence amendment or other licensing action would likely be required
 - where applicable, the alternatives evaluated and the reasons for selection of the chosen option
 - any changes to the inventories of nuclear substances on site related to the proposed change
 - the construction, commissioning and operating schedule for the proposed change including hold points or progress reports for regulatory review and approval (as appropriate)
 - expected impacts, if any, on the proposed decommissioning or closure plans
 - results of any risk analysis or hazard operability studies performed, and a summary of the identified hazards and the mitigation measures identified to control potential hazards
 - b) The description of the design control, operating specifications and criteria including:
 - the design basis and criteria, and performance specifications
 - the design drawings such as the general arrangement, process and instrumentation diagrams, and process flow sheets
 - the quality management program for the various key stages of the change (e.g., design, construction, commissioning, etc.)

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- c) The assessment of both the short and long term impacts with the mitigation measures in place on:
 - worker's health and safety, including potential radiological and non-radiological exposures
 - the environment
 - security
 - Canada's international obligations
 - d) The planned administrative controls including:
 - changes to the organization, roles and responsibilities
 - changes to applicable programs and procedures
 - a description of the proposed monitoring, inspection and test plans, including locations and frequency proposed to evaluate both positive and negative results
 - e) Changes to contingency plans including "full-stop measures"
 - f) Evidence that the licensee's internal reviews and approvals have been completed, including meeting the requirements of the licensee's change management procedure and consultation with the onsite occupational health and environmental committees, where applicable
 - g) Identification of the documents and training programs that may require revision when the proposed change is implemented
2. The effects of the proposed change or action remain within the licensing basis.
 3. Following the implementation of the change the licensee will remain in compliance with the requirements set out in the applicable acts, regulations, and LCs.

A.3 Dispute Resolution

In case of a dispute between the licensee and CNSC staff regarding changes to the LCH, both parties will meet to discuss the dispute and reach a decision on the path forward. The decision, including its rationale will be documented. If any party is not satisfied with the decision, the resolution process will proceed up to the Director, Director General or Executive Vice-President and Chief Regulatory Operations Officer level. If any party is still not satisfied with the decision, the issue will be brought to the attention of the Commission at a Commission meeting. The decision made by the Commission will be final.

A.4 Records Management

In order to track changes to the LCH, the document change request and accompanying documentation will be archived in records and referenced in the revision history of the LCH. Electronic communication related to the change, such as comments from reviewers will be stored in the CNSC information management system.

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A.5 Distribution

A copy of the updated version of the LCH will be distributed to the following parties:

- Uranium Mines and Mills Division, CNSC
- Cameco Corporation

A.6 Reporting to the Commission

CNSC staff will report on the changes made to the LCH during the previous year in their annual report to the Commission.

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APPENDIX B LICENSEE DOCUMENTS THAT REQUIRE NOTIFICATION OF CHANGE

Document Title
Eagle Point Mine Program
Emergency Preparedness and Response Program
Environmental Protection Program
Fire Protection Program
Maintenance Program
Mill Operations Program
Mining Facility Licensing Manual
Occupational Health and Safety Program
Preliminary Decommissioning Cost Estimate
Preliminary Decommissioning Plan
Public Information Program
Quality Management Program
Radiation Protection Program
Security Program
Transportation Program
Training and Development Program
Waste Management Program
Financial Guarantee Instruments
Environmental Risk Assessment, 2020

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APPENDIX C LIST OF DOCUMENTS USED AS GUIDANCE OR COMPLIANCE VERIFICATION CRITERIA

Document	Document Title	Document Number
Canadian Dam Association	Canadian Dam Association, Canadian Dam Safety Guidelines	N/A
CNSC	Preparing Codes of Practice to Control Radiation Doses at Uranium Mines and Mills	G-218
CNSC	Management System	REGDOC-2.1.1
CNSC	Human Factors	REGDOC-2.2.1
CNSC	Safety Analysis for Class IB Nuclear Facilities	REGDOC-2.4.4
CNSC	General Design Considerations: Human Factors	REGDOC-2.5.1
CNSC	Environmental Protection: Environmental Principles, Assessments and Protection Measures, Version 1.2	REGDOC-2.9.1
CNSC	Dosimetry, Volume I: Ascertaining Occupational Dose	REGDOC-2.7.2
CNSC	Personnel Training, Version 2	REGDOC-2.2.2
CNSC	Nuclear Emergency Preparedness and Response, Version 2	REGDOC-2.10.1
CNSC	Decommissioning	REGDOC-2.11.2
CNSC	Safeguards and Nuclear Material Accountancy	REGDOC-2.13.1
CNSC	Public Information and Disclosure	REGDOC-3.2.1
CNSC	Licence Application Guide Nuclear Substances and Radiation Devices	REGDOC-1.6.1
CNSC	Safety Culture	REGDOC-2.1.2
CNSC	Design of Uranium Mines and Mills: Ventilation Systems	REGDOC-2.5.4
CNSC	Conventional Health and Safety	REGDOC-2.8.1
CNSC	Waste Management, Volume I: Management of Radioactive Waste	REGDOC-2.11.1
CNSC	Waste Management, Volume II: Management of Uranium Mine Waste Rock and Mill Tailings	REGDOC-2.11.1
CNSC	Waste Management, Volume III: Safety Case for the Disposal of Radioactive Waste, Version 2	REGDOC-2.11.1

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Document	Document Title	Document Number
CNSC	Security of Nuclear Substances: Sealed Sources and Category 1, II and II Nuclear Material, Version 2.1	REGDOC-2.12.3
CNSC	Reporting Requirements, Volume I: Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills	REGDOC-3.1.2
CNSC	Financial Guarantees for Decommissioning of Nuclear Facilities and Termination of Licensed Activities	REGDOC-3.3.1
CNSC	Regulatory Fundamentals	REGDOC-3.5.3
CNSC/SK	CNSC – Saskatchewan Harmonized Annual Reporting Requirements, August 2010	e-Doc 3678482
CSA Group	Management System Requirements for Nuclear Facilities	N286-12
CSA Group	Environmental Management of Nuclear Facilities: Common requirements of the CSA N288 series of Standards, 2022	N288.0:22
CSA Group	Environmental Monitoring Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.4-19
CSA Group	Effluent Monitoring Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.5-22
CSA Group	Environmental Risk Assessments at Class I Nuclear Facilities and Uranium Mines and Mills	N288.6-22
CSA Group	Groundwater Protection Programs at Class I Nuclear Facilities and Uranium Mines and Mills	N288.7-15
CSA Group	Establishing and Implementing Action Levels for Releases to the Environment from Nuclear Facilities	N288.8-17
CSA Group	Decommissioning of Facilities Containing Nuclear Substances	N294-09
CSA Group	Environmental Management Systems – Requirements with Guidance for Use	ISO 14001:2015
CSA Group	Fire Protection for Facilities that Process, Handle, or Store Nuclear Substances	N393-13
CSA Group	Selection, use and care of respirators	Z94.4-11
NRC	National Building Code of Canada (2015)	N/A
NRC	National Fire Code of Canada (2015)	N/A

Note: For CNSC documents, the most recent version of a referenced document shall be implemented following review and agreement between Cameco and the Canadian Nuclear Safety Commission.

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