



**Written submission from the
Canadian Nuclear Association**

**Mémoire de l'Association
nucléaire canadienne**

In the Matter of the

À l'égard de

Cameco Corporation, Beaverlodge Project

**Cameco Corporation, le projet de
Beaverlodge**

Application for the Licence Revocation and
Transfer of Properties to Saskatchewan
Institutional Control Program

Demande de révocation de permis et de
transfert de propriétés au programme de
contrôle institutionnel de la Saskatchewan

Commission Public Hearing

Audience publique de la Commission

January 30, 2025

30 janvier 2025

December 9, 2025

Canadian Nuclear Safety Commission
c/o Registry
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Written Intervention Regarding Cameco Corporation's Request for the Revocation of the Beaverlodge Waste Facility Operating License, WFOL-W5-2120.0/2025

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 80,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety and environmental stewardship throughout the entire life cycle of the nuclear industry including the release of sites to long-term stewardship or free release.

The decommissioned Beaverlodge uranium mine and mill site currently consists of 27 individual properties licenced by the Canadian Nuclear Safety Commission (CNSC). The current licence authorizes Cameco to manage the reclamation, maintenance and monitoring activities at the Beaverlodge properties. Cameco's objective in managing these properties is to protect the health and safety of the public and environment, and to meet the requirements for the transfer of the decommissioned properties to the Saskatchewan Institutional Control (IC) program. Following their release from CNSC licensing, the 27 properties in this request will join the 43 decommissioned Beaverlodge properties currently in the provincial IC Program.

As the Commission knows, the decommissioned Beaverlodge uranium mine/mill and associated properties were operated by Eldorado Nuclear Limited between 1952 and 1982. Decommissioning activities took place between 1982 and 1985. In 1988, Eldorado Nuclear was merged with Saskatchewan Mining Development Corporation to form Cameco. Since 1988, Cameco has managed the Beaverlodge properties.

In 2009, Cameco developed the Beaverlodge Management Framework which provided a clear scope for the management of the properties and a systematic process for assessing site specific risks in order to allow transfer of properties to Saskatchewan's IC program. In following the Framework, Cameco also developed the Beaverlodge Path Forward Report (Path Forward) to establish an agreed upon remediation plan paired with evaluation criteria and the expected timeline for transferring properties into the IC Program. Cameco has followed the Beaverlodge Management Framework and Path Forward, that were



approved by the Commission. On August 7, 2024, the Saskatchewan Ministry of Environment and the Saskatchewan Ministry of Energy and Resources issued letters of intent to the CNSC and Cameco stating Cameco has fulfilled the requirements and obligations described in the approved Path Forward for the 27 properties.

So far, 43 properties have been released from CNSC licensing. This application asks for the final set of 27 decommissioned properties to be released from CNSC licensing to allow transfer to the IC program. As outlined in detail in Cameco's application, the 27 properties in this application have been assessed and meet the established performance criteria and pose minimal risk to the public and the environment. Therefore, they are eligible for long term stewardship in the province of Saskatchewan's IC Program. It is also important to note that the province has provided notice that it will grant a Release from Decommissioning and Reclamation. The IC program provides assurance of sufficient funding to carry out monitoring and maintenance activities and to address any unforeseen events.

In 2020, Cameco submitted an updated Environmental Risk Assessment (ERA), which was completed in accordance with CSA N288.6 standard and used a pathways assessment to evaluate potential risks to ecological and human receptors on and downstream of the decommissioned properties. Consistent with previous assessments, the 2020 ERA concluded that the immediate and downstream environments will continue to naturally recover. It also showed that living a traditional lifestyle and consuming country foods from the area, while respecting the water and fish advisories, can continue to be done safely. Community based monitoring programs conducted in the Uranium City area, and elsewhere in the Athabasca Basin, continue to demonstrate that the foods and water consumed by community members are safe and part of a healthy diet.

As with all its sites, Cameco has a robust Public Information Program designed to ensure Indigenous groups and interested audiences are informed on a timely basis about activities and any potential impacts on human health and safety or the environment.

In 2016, Cameco signed a collaboration agreement with the seven Athabasca Basin communities - known as the Ya'thi Nene Collaboration Agreement. Under the agreement, the Athabasca Joint Engagement and Environment Subcommittee meets regularly to provide updates and discuss issues around the Beaverlodge Properties. Cameco also focuses engagement with the northern settlement of Uranium City, including the Uranium City Metis Local 50. The properties are located approximately 8 km from the Northern Settlement of Uranium City, a community with roughly 60 residents. It is important to note that Uranium City is the only community with year-round road access to the properties.

As outlined above, the CNA believes that Cameco has been, and continues to be, a responsible manager of the decommissioned Beaverlodge properties and demonstrated that the applied-for properties are now ready for release to the IC Program.

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

Sincerely,



Brian Torrie

Director of Regulatory Affairs
Canadian Nuclear Association