

Denison Mines Corp. Wheeler River Operation

# **Emergency Preparedness and Response Program**

Document #13

**Version 2** 

**April 2025** 

# **Approval for Use**

Version	Date	Description of Activities	Author	Reviewer	Approver
Version 1	27-Sept-2023	For CNSC Review			

# **Revision History**

Version	Date	Description of Revision
1	27-Sept-2023	For CNSC Review
2	April 2025	<ul> <li>2.3.3 Facilties and Equipment – added detail.</li> <li>2.6.2 External Communication – added reference.</li> <li>2.7 Change Management – added clarification</li> </ul>



# **Table of Contents**

1	Intro	duction	
	1.1	Purpose	
	1.2	Scope	1
	1.3	Program Overview and Principles	
	1.4	Compliance with Regulatory Requirements	
	1.5	Terminology	
		1.5.1 Definitions	
		1.5.2 Acronyms and Abbreviations	
2			
	2.1	Risk Management	
		2.1.1 Hazard Identification	
		2.1.2 Risk Register	
		2.1.3 Program-specific Risk Methodologies and Controls	
	2.2	Objectives and Targets	
	2.3	Resources	
		2.3.1 Roles and Responsibilities	
		2.3.2 External Resources	
		2.3.3 Facilities and Equipment	
		2.3.4 Legal and Other Requirements	
	2.4	Training and Competence	
		2.4.1 Program-Specific Training	
	2.5	Documentation and Records Management	
	2.6	Communication	
		2.6.1 Internal Communication	
		2.6.2 External Communication	
	2.7	Change Management	
3			
	3.1	Supporting Plans	
		3.1.1 Emergency Response Plan	
		3.1.2 Transportation Emergency Response Plan	
_		3.1.3 Crisis Management	
4		k	
	4.1	Monitoring and Measurement	
	4.2	Inspections and Audits	
	4.3	Management Review	
	4.4	Reporting	
5			
	5.1	Corrective Action	
_	5.2	Continual Improvement	
6		rences	
	6.1	Internal	
	6.2	External	18



# **Figures**

Figure 1: Program shown within Document Framework for the Wheeler River Operation......1



# 1 Introduction

The Emergency Preparedness and Response Program (the Program) is one of the Program documents that comprise the Management System for the Wheeler River Operation (the Operation). The Emergency Preparedness and Response Program is preceded by the Management System Program within the document framework for the Operation as shown in Figure 1. Consistent with all other Program documents, the Emergency Preparedness and Response Program is organized according to the 'Plan-Do-Check-Act' iterative process to incorporate continual improvement in all stages of the Program.

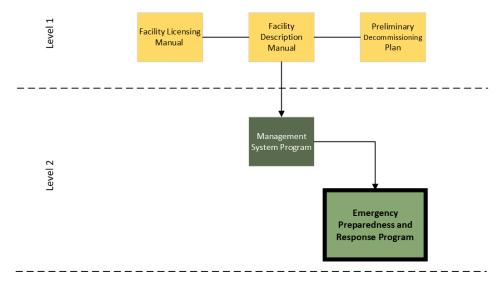


Figure 1: Program shown within Document Framework for the Wheeler River Operation

# 1.1 Purpose

The Program provides processes and structure for overall crisis planning efforts at the Operation. It further provides a framework for development of the site emergency response plan, processes, work instructions, and further supporting documentation at the Operation. The Program also identifies the plans, outlining specific requirements for emergency response, Wheeler River transportation emergency response, and corporate crisis management.

#### 1.2 Scope

The Program addresses emergency events and situations that threaten the health and safety of workers, local Indigenous groups and communities, the environment, or Operation infrastructure. It applies to Operation emergency preparedness and response activities for on-site emergencies, accidents involving hazardous substances originating from the Operation, and mutual aid to offsite emergencies as directed by Denison management.

# 1.3 Program Overview and Principles

The Operation approach to emergency prevention, preparedness, response, and recovery is based on four fundamental principles. These principles, in order of importance are:

Preserving the safety of the emergency response team;



- Protecting human life;
- Protecting the environment; and
- Protecting Operation property.

Due to the nature of Operation activities, workers are exposed to certain real and perceived safety, environmental, operational, and political risks. Exposure to these risks could result in a crisis.

In response to this exposure, the Program is implemented allowing to deal effectively with Operation emergencies, considering site-specific conditions and utilizing important expertise. In coordination with the Program, supporting documentation and processes include:

- Crisis Management Plan, including business continuity and pandemic plans;
- Emergency Response Plan; and
- Transportation Emergency Response Plan.

The Operation has established the *Management System Program* that provides the foundation for Denison's approach to health and safety, including emergency management.

The Program provides guidance to the Operation to:

- Establish objectives and targets consistent with applicable policies and EPRPs (Plan);
- Implement the process (Do);
- Monitor and measure (Check); and
- Continually improve on activities and controls to achieve the policy commitments (Act).

# 1.4 Compliance with Regulatory Requirements

This Program is compliant with the *Nuclear Safety and Control Act* and associated regulations, including the *General Nuclear Safety and Control Regulations*, and the *Uranium Mines and Mills Regulations*. The Program also follows guidance and requirements in the Canadian Nuclear Safety Commission (CNSC) REGDOC 2.10.1 *Nuclear Emergency Preparedness and Response*.

Additionally, the Program meets CSA N393 Fire protection for facilities that process, handle, or store nuclear substances, requirements of the Environmental Emergency Regulations, and provincial requirements including the Occupational Health and Safety Regulations, the Fire Safety Act, and The Mines Regulations.

# 1.5 Terminology

#### 1.5.1 Definitions

Term	Definition
Emergency Drill	A coordinated and supervised activity including typical attributes of: a narrow focus, limited number of personnel, specific equipment, timely feedback, and a realistic environment.
Emergency Tabletop Exercises	Round table discussions of a potential emergency situation developed to practice elements of the emergency preparedness and response plan and structured to meet specific identified objectives.



Full-scale Emergency Exercises/Simulations	An exercise that typically takes place over several hours and tests the integrated performance of the emergency preparedness and response. Typical attributes of an emergency exercise include mobilization of apparatus and resources in a realistic environment over an extended period of time, demonstration of inter-agency cooperation, testing of communication systems and public information systems, and testing of
	emergency facilities and equipment readiness.

# 1.5.2 Acronyms and Abbreviations

Acronym or Abbreviation	Term
ERP	Emergency Response Plan
EPRP	Emergency Preparedness and Response Program
FPP	Fire Protection Plan
KPI	Key Performance Indicator
SAT	Systematic Approach to Training



## 2 Plan

## 2.1 Risk Management

The risk management process includes identifying Operation-related hazards that could result in emergency situations, determining the significance of the associated risks, and managing the risks to appropriate levels through the application of controls.

Identification and classification of potential health, safety, and environmental risks are an integral part of the Program. An appropriate level of risk assessment is conducted for identified incidents and used in classification of these potential events. The Program, in coordination with the *Crisis Management Plan* where required, outlines actions taken when specific emergency actions arise including:

- Identification of accidents and emergencies;
- Details of actions to be taken during the emergency;
- Measures to protect workers during an emergency or crisis;
- Incident command structure and delegation of authority to effectively manage both short-term and complex, lengthy, and large-scale emergencies and crisis;
- Evacuation procedure, including muster points;
- Identification and location of hazardous materials;
- Emergency response services, equipment, supplies, and facilities;
- Interface with external emergency services;
- Communications with statutory bodies;
- Communications with neighboring indigenous communities and the public;
- Protection of vital records and equipment;
- Availability of vital information during an emergency (e.g., plant drawings, applicable SDs, location of hazardous chemical storage);
- Recovery steps to restore the site to normal operations; and
- Mechanisms for evaluating the effectiveness of the Program and associated plans.

The manner and extent to which individual elements of the Program are applied at the Operation will depend on such factors as size of site, exiting documentation, the nature of activities and impacts, expected duration of projects, and operating conditions.

#### 2.1.1 Hazard Identification

Preparing for emergencies begins with identifying natural or human-made hazards that could result in emergency events or situations. Following hazard identification, emergency risks are assessed with consideration for a range of factors.

Examples of natural hazards include:

- Lightning strikes;
- · Flash flooding;
- Winter storms;
- · Forest fire; and
- Sudden medical distress of worker (e.g., heart attack).



Examples of human-made hazards include:

- Chemical, biohazard, or radiological release;
- Structural collapse;
- Fire or explosion;
- Transport accident;
- · Intentional violence or threats; and
- Technological failures.

Hazards are identified, documented, assessed, and tracked in a risk registry which is periodically reviewed and revised as necessary to confirm it remains current and accurate.

#### 2.1.2 Risk Register

Denison uses a risk register to proactively identify and address significant radiation protection risk aspects, prioritize resources, and continuously improve its emergency management practices. The risk register is a central repository for recording and tracking information related to the significant training aspects.

Further details on the risk register are provided in the Management System Program.

#### 2.1.3 Program-specific Risk Methodologies and Controls

Controls are used to eliminate, prevent, or reduce the risk of harm to workers, the public, the environment, and property during emergency events and situations. Controls are documented, tracked in a risk registry, and are periodically evaluated for effectiveness. Emergency risk controls include, but are not limited to:

- Emergency response teams;
- Emergency response equipment;
- Fire suppression systems and equipment;
- Fire guards;
- Ventilation systems;
- Proper segregation and storage of hazardous goods;
- Administrative controls such as emergency and crisis management plans, work instructions, training, and supervision;
- Mutual aid agreements; and
- Personal protective equipment.

Controls appropriate for the emergency hazard and corresponding level of risk are selected and implemented with consideration for the hierarchy of controls as outlined in the *Health and Safety Management Program*.

Controls are used, operated, and maintained in accordance with their design, limitations, and applicable training. Following appropriate procedures and training is critical in maintaining the effectiveness of controls

The general process for identifying and applying controls is outlined in the *Management System Program*.



# 2.2 Objectives and Targets

The Operation is responsible for establishing, implementing, and documenting Program objectives and annual targets. Objectives and targets of this Program will be measurable, documented, and tracked. Performance against the objectives and targets will be communicated at regular intervals (i.e., during Management Review), and opportunities for continual improvement will be identified.

The process for setting overall objectives and targets is outlined in the *Management System Program* and supporting procedure.

#### 2.3 Resources

Denison is committed to providing the necessary resources to support effective development, implementation, maintenance, and continual improvement of the Program, including achievement of its objectives and targets.

## 2.3.1 Roles and Responsibilities

This subsection outlines the specific roles and responsibilities within the Program, including EPRP Management and EPRP Coordinator, and other workers with various levels of responsibility.

For effective implementation of this Program, workers are informed of their roles and responsibilities and are accountable for comprehending and performing them. Executive and Leadership level roles and responsibilities are specified in the *Management System Program*.

#### **EPRP Management**

- Overseeing the development, implementation, and adherence to this Program;
- Setting objectives and targets, tracking performance using key performance indicators (KPIs), and preparing internal and external reports regarding EPRP activities and outcomes;
- Confirming compliance to regulatory and Operation requirements;
- Confirming appropriate resources are made available for competence, training, and awareness of EPRP requirements;
- Confirming accountability of the activities of EPRP coordination for carrying out this Program;
- Working with applicable departments to verify that Program roles and responsibilities are identified and outlined, and that those with specific responsibilities are qualified to fulfill their roles;
- Communicating with external stakeholders as appropriate;
- Reporting on EPRP performance and effectiveness to Operation Management;
- Facilitating management review of the EPRP and maintain associated records including tracking decisions and actions stemming from the review; and
- Maintaining continual improvement through EPRP evaluation.

#### **EPRP Coordinator**

- Demonstrating and promoting a positive health and safety culture;
- Leading the development, implementation of, and adherence to EPRP procedures and work instructions;
- Verifying 24-hour emergency response coverage is provided;



- Maintaining EPRP-specific data and records in a secure and controlled manner;
- Providing subject matter expertise and support;
- Confirming that workers meet and maintain required EPRP-specific training qualifications; and
- Reporting on Program performance as part of the annual management review process.

#### 2.3.2 External Resources

In addition to using Operation workers, facilities, and equipment, external resources may be utilized to effectively manage emergency events and situations. Examples include, but are not limited to:

- Establishing mutual aid agreements with neighbouring communities;
- Using Saskatchewan Air Ambulance or Shock Trauma Air Rescue Service (STARS) for transporting patients for medical treatment; and
- Coordinating wildfire response with the Saskatchewan Public Safety Agency.

A list of potential external resources along with their contact information and the processes for engaging them are further defined in the *Emergency Response Plan*, the *Transportation Emergency Response Plan*, and the *Crisis Management Plan*.

## 2.3.3 Facilities and Equipment

Facilities and equipment used for emergency response will be identified, of sufficient size and quantity, properly maintained and in working condition at all times. However, facilities and equipment may be taken out of service for required maintenance if alternate provisions are put in place during these periods.

Denison provides facilities to support the effective implementation of the program and its associated processes. Examples of facilities and equipment used and maintained as part of this Program include:

- An emergency operations centre equipped with communication devices and administration aids (e.g., status boards and reference materials);
- An alternate emergency operations centre will be located at camp;
- Emergency response vehicles (e.g., ambulance, fire truck);
- Storage facilities for emergency response vehicles, equipment, and tools;
- Hazardous material response equipment and trailer;
- Wildfire protection of critical infrastructure (e.g., exterior permanent and portable sprinkler systems);
- An on-site medical center;
- First aid equipment
- Marked muster stations;
- Alarm systems;
- Emergency lighting and power;
- Critical isolation valves
- Communication equipment; and
- Fire suppression infrastructure (fire water pump, sprinklers, and fire extinguishers).



The Wheeler River Operation will have backup power capable of sustaining emergency power to emergency response facilities for a minimum of 72 hours. It will also have essential safety equipment, PPE and other appropriate supplies, such as food and water for a minimum of 72 hours.

Facilities and equipment meet or exceed applicable Saskatchewan and federal health and safety standards, codes, and regulations. Additional information on the specific facilities and equipment used for emergency management are outlined in the supporting *Emergency Response Plan*, *Crisis Management Plan*, and *Transportation Emergency Response Plan*.

The process for procuring facilities and equipment is outlined in the *Facility and Equipment Management Program*.

#### 2.3.4 Legal and Other Requirements

Denison is committed to complying with all applicable legal and other requirements related to the management of emergency preparedness and response. Types of legal requirements applicable to the Operation include:

- · Federal and provincial acts and regulations; and
- Licensing obligations and commitments.

The process for managing legal and other requirements is outlined in the *Management System Program*. Denison has established procedures to ensure compliance with these requirements and that compliance obligations are regularly reviewed. Any changes relevant to training compliance obligations are monitored and evaluated to determine if updates to the *Emergency Preparedness and Response Program* and its supporting Plans, Procedures, and Work Instructions are required.

# 2.4 Training and Competence

A systematic approach to training (SAT) is used to educate, train, and qualify workers and contractors to perform assigned work. Training requirements are monitored to verify workers have necessary training when needed to maintain competency and work safely. Program-specific training requirements are defined in the *Training Management Program*.

Records of training activities and competencies will be maintained as outlined in the *Training Management Program*.

#### 2.4.1 Program-Specific Training

The Operation identifies the competency requirements for both workers and contractors who will be part of emergency response and confirm those workers are trained, aware, and competent to perform these duties in a safe and effective manner.

Contractors may volunteer to participate as a member of the emergency response team. Role-specific training and competency details are outlined in the procedure *Emergency Response Team*. Program specific training is developed, delivered, and maintained in accordance with the SAT process and with consideration for applicable provincial and federal regulatory requirements.

Workers performing emergency response tasks are competent based on appropriate education, training, and experience or are under the direct supervision of competent Operation personnel. Workers receive qualifications through Operation personnel or appropriate certifying bodies.



Requirements for any necessary re-qualifications are tracked and training provided on appropriate schedules.

Operation workers, contractors, and visitors are required to participate in site orientation prior to work initiation. Site orientation includes general requirements for protecting personnel and the environment as well as important actions to follow during emergency events and situations.

# 2.5 Documentation and Records Management

Denison will establish and maintain documented Plans, Procedures and Work Instructions to ensure effective implementation of the Program. Documentation will be controlled, reviewed, and updated as necessary in accordance with the requirements in the *Management System Program*.

Documents and records will be generated as a result of implementation of the Program and completion of licensed activities. Examples of some records generated specific to the Program may include:

- Emergency preparedness and response plans;
- Emergency response action logs and response debriefs;
- Emergency response team training;
- Emergency drills, exercises, and debriefs;
- Worker selection, qualifications, and training for emergency preparedness and response;
- Records required by this Program; and
- Records of inspection, maintenance, and calibration of emergency response equipment.

Documentation and records are readily accessible to those who require them. Occupational exposure and health records associated with emergency response activities (e.g., radiation doses to workers during a response) are managed in accordance with applicable privacy legislation.

Information, including the identification of critical facilities and equipment, and documents and records generated for or because of emergency events and situations is managed to verify the information is accurate, available when needed, and protected from uncontrolled alteration.

#### 2.6 Communication

Communication both with internal and external stakeholders is a critical element of the Program to promote a safe work culture that understands the importance of emergency preparedness and response. Relevant emergency response information such as plan performance data and improvement initiatives will be shared.

Internal and external communication processes specific to emergency events and situations are further outlined in the *Emergency Response Plan*, the *Transportation Emergency Response Plan*, and the *Crisis Management Plan*.

During and following emergency events and situations, information is communicated to and among various internal and external parties affected by, involved in, and interested in emergency events and situations. This includes, but is not limited to:

- Workers and contractors;
- Emergency response teams;
- Regulatory agencies; and
- Indigenous groups, local communities, and the public as required.



Only persons authorized by Denison Mines may communicate on behalf of the company. This includes communication with the media, regulators, customers, shareholders, suppliers, and the general public.

Communication principles and processes are further outlined in the *Management System Program*, and communication with indigenous groups, local communities, and the public is managed as outlined in the *Public and Indigenous Information Program*.

#### 2.6.1 Internal Communication

Communication procedures are developed at the corporate and site level to identify and classify events that may adversely affect the health and safety of workers, verifying timely and appropriate communication to senior management. Such procedures confirm that when an unusual or unplanned event occurs, the appropriate levels and functions at the Operation and the corporate office are informed so that decisions and corrective action are carried out at the appropriate level of responsibility and authority.

The following types of Program related information is communicated internally among the various levels and functions at the Operation:

- How to activate the Operation's emergency response plans;
- Internal communication procedures during an emergency response, including communication procedures with the corporate crisis management team;
- Emergency response levels, risk assessment, and plans;
- Emergency response plan objectives, targets, and key performance indicators;
- Results of emergency response plan testing; and
- Program non-conformances and corrective actions taken in response.

#### 2.6.2 External Communication

The Operation notifies the appropriate external authorities when assistance is required in responding to an emergency (e.g., mutual-aid agreements, contract emergency response providers). All other external communication (i.e., notifying the appropriate regulatory authorities during an emergency response) is managed as outlined in the *Crisis Management Plan*. Procedures for receiving, documenting, and responding to communication from external stakeholders are developed for use.

<u>Please refer to Regulatory Reporting Requirements Procedure for more information.</u>

# 2.7 Change Management

Change is managed at the Operation to protect workers, the environment, and property, and to ensure that regulatory requirements are met. The Operation's change management process is outlined in the *Management System Program*.

Examples of changes captured by the process could include, but is not limited to changes to the:

- Emergency Preparedness and Response Program and supporting plans, procedures, and work instructions;
- Structures, systems, and components;
- Regulatory requirements related to emergency response;
- Emerging risks to workers; and



• Organizational changes.

All changes to emergency response plans and procedures will be submitted to the CNSC for change approval – 30 days in advance of implementation.



## 3 Do

# 3.1 Supporting Plans

This Program is supported by documented plans that describe actions to be taken in the event of an emergency or crisis. Supporting documentation covers the following topics:

- Criteria and conditions that triggers the activation of response activities;
- Details of actions to be taken during the emergency or crisis including methods for continually assessing the emergency;
- Measures to protect workers during an emergency or crisis;
- Incident command structure and delegation of authority to effectively manage both short-term and complex, lengthy, and large-scale emergencies and crises;
- Responsibilities and duties during an emergency or crisis, including delegation of primary authority;
- Emergency response services, equipment, supplies, and facilities;
- Emergency radiation protection measures;
- Evacuation procedures including muster points;
- Availability of vital information during an emergency (e.g., operation drawings, information on hazardous substance and their locations);
- Response interface with external emergency services;
- Communication protocols including timelines with regulatory agencies, indigenous groups, local communities, and the public;
- Protection of vital records and equipment;
- Recovery steps to restore the site to normal operations; and
- Mechanisms for evaluating the effectiveness of the plan.

These plans and the supporting procedures are controlled documents. They are reviewed, updated, and maintained in accordance with the documented information process outlined in the *Management System Program*.

#### 3.1.1 Emergency Response Plan

The *Emergency Response Plan* documents the approach for rapidly and efficiently responding to, controlling, and minimizing the effects of emergency events and situations that occur within the boundary of the Operation site. Emergency events or situations that occur beyond the Operation boundary, but threaten Operation safety or security, are also discussed. Examples of emergency events and situations covered by the *Emergency Response Plan* include but are not limited to:

- Serious medical emergencies;
- Surface fires;
- · Wildfire threatening the Operation; and
- Major chemical or radiological release.

The *Emergency Response Plan* describes the resources that are available and accessible for emergency response operation; specific roles and responsibilities for incident command and emergency response team members; and protocols for responding to all foreseeable emergency events and situations. It



outlines the actions to be taken during emergency events or situations, including actions taken in coordination with the *Transportation Emergency Response Plan* and the *Crisis Management Plan*.

#### 3.1.2 Transportation Emergency Response Plan

The *Transportation Emergency Response Plan* provides direction to Operation emergency responders concerning ground transportation emergencies that occur along the Operation site access road or along Highway 914. The spatial extent and scope of response activities is further outlined within the plan.

The *Transportation Emergency Response Plan* is not a substitute for an *Emergency Response Assistance Plan* (ERAP) which is a regulatory requirement for transporting certain high-risk dangerous goods, including uranium concentrate. Transporting uranium concentrate beyond the Operation boundary is not within the scope of this Program or the construction and commissioning phase of the Operation. However, an ERAP developed in accordance with the *Transportation of Dangerous Goods Regulations* and approved by Transport Canada will be in place prior to commencement of operations.

Operation emergency responders may assist as first responders or in a technical advisory capacity. The decision to provide support depends on several factors, including the nature of the transportation emergency, weather conditions, the capacity and ability of team members to respond safely, and the proximity of the emergency to the site. Response activities may include, but are not limited to:

- Providing first aid for injuries suffered at an accident scene;
- Controlling and containing dangerous goods;
- Controlling access to the accident scene;
- Removing debris from the accident scene; and
- Supporting transportation logistics.

Assistance is provided in coordination with applicable authorities (e.g., RCMP, Saskatchewan Ministry of Environment) and transport carriers. Dangerous goods transported to the site are the sole responsibility of the transport carrier and the manufacturer of the dangerous goods until they reach the Operation property boundary.

#### 3.1.3 Crisis Management

The purpose of the *Crisis Management Plan* is to provide an organized response to crisis events and situations involving Operation workers or assets and to provide a framework for maintaining, resuming, or recovering critical activities after a crisis is resolved.

A crisis is an abnormal event or situation which presents a significant risk to the Operation, draws media attention, and could threaten public trust. Crises can be situations that are unexpected, unstructured and outside the typical operational framework. Examples include, but are not limited to:

- Multiple serious injuries;
- A fatality;
- Significant security breach of the Operation site;
- Significant breach of information technology system;
- Receipt of a bomb threat;
- Serious civil disturbance on or adjacent to Operation site or Denison property; or



• A situation which poses an immediate threat to life or serious injury to persons at the Operation.

The *Crisis Management Plan* includes crisis assessment criteria that are used to activate crisis response measures and the contact information for key personnel responsible for activating the plan if required.



# 4 Check

# 4.1 Monitoring and Measurement

Emergency response and preparedness performance is monitored and measured against established objectives and targets (identified in Section 2.2). Denison will monitor, measure, analyze, and evaluate emergency response for the Operation based on a defined process outlined in the *Management System Program*.

Monitoring and measurement activities specific to the *Emergency Response and Preparedness Management Program* may include:

- Emergency response tabletop exercises, drills, or full-scale exercises;
- Frequency or trends in non-conformities, injuries, and incidents; and
- Evaluation of emergency responder training.

Exercises, drills, and full-scale exercises are carried out according to a predetermined schedule. Where appropriate, the participation of external emergency services in full-scale exercises is encouraged. A test emergency response plan defines the expected performance of the exercise and aids in measuring the Operation's emergency preparedness by:

- Documenting information to evaluate preparedness against expected or legislated performance and effectiveness measures; and
- Conforming with site objectives and targets.

Following the completion of any test of the emergency response plan, the effectiveness of the plan being tested is evaluated against expected measures and, where necessary, opportunities for improvement or nonconformances recommended and acted upon.

# 4.2 Inspections and Audits

Denison will conduct internal audits of the *Emergency Preparedness and Response Program* to assure compliance with the requirements set out in the Program and to determine if the Program is effectively implemented and maintained.

Audits are conducted by qualified personnel independent of the work being assessed and will follow the process and procedures outlined in the *Management System Program*.

In addition to audits, routine internal inspections of emergency response facilities and equipment are conducted by competent personnel to verify that controls are functioning and effective. This includes, but is not limited to, inspections of:

- Emergency response equipment and alarms;
- Fire suppression systems and equipment;
- Fire guards;
- Ventilation systems;
- Proper segregation and storage of hazardous goods; and
- Personal protective equipment.



# 4.3 Management Review

The Emergency Response and Preparedness Program will be reviewed by Denison management in accordance with a defined frequency to assure the Program is meeting its objectives, is effective or needs adjustment. The types of items related to emergency response that Denison management will review may include:

- Suitability, adequacy, and performance of emergency response objectives and targets;
- Upcoming or new legislation related to emergency response;
- Results of exercises and drills in relation to objectives and targets;
- Results of audits in relation to program performance objectives and targets;
- Identified opportunities for improvement based on emergency events, incident reports, and other sources;
- Communications from interested parties;
- Adequacy of resources; and
- Any needs for program adjustment.

Where necessary, Denison management will identify opportunities for improvement and establish action plans to implement change in accordance with the process outlined in the *Management System Program*.

# 4.4 Reporting

Denison will routinely report both internally and externally on the performance of the *Emergency Preparedness and Response Program*. External reporting can include reporting to regulators, the public, and Indigenous and local communities.

External reports including notification to appropriate regulatory authorities during an emergency response will be completed in accordance with regulatory requirements. As noted in section 2.8.2 this is managed as outlined in the *Crisis Management Plan*.

External reports to the public or Indigenous communities on the performance of the Program will be tailored to the interests of these groups as identified through community engagement activities. Reporting, disclosure, and communication to the public and Indigenous and local communities is discussed in more detail in the *Public and Indigenous Information Program*.



#### 5 Act

#### 5.1 Corrective Action

Non-conformities or areas for improvement are identified following the process outlined in the *Management System Program* and the supporting procedures. These non-conformities can include emergency events, incidents, near-misses, and deviations from the *Emergency Preparedness and Response Program*. Non-conformities can also be identified during inspections and audits.

Responses to identification of non-conformities include investigation of cause, and corrective action if appropriate. Corrective actions are planned, implemented, verified, and reviewed for effectiveness based on the process identified in the *Management System Program*.

# 5.2 Continual Improvement

Opportunities for improvement of this Program will be identified and addressed to enhance emergency preparedness and response. The continual improvement process for this Program follows the overall continual improvement process outlined in the *Management System* and the supporting procedures. Continual improvement may also include updating Program objectives and targets based on changing circumstances or new information. Improvement may involve benchmarking performance against other similar projects and facilities. Any changes identified through the continual improvement process will be implemented in a systematic and controlled manner.

With respect to emergency response, opportunities for continual improvement may be identified through review of monitoring results, incident investigations, lessons learned, worker experience, government and industry publications, and industry peer information exchanges.

# 6 References

#### 6.1 Internal

Document Name
Management System Program
Emergency Response Plan
Transportation Emergency Response Plan
Crisis Management Plan
Training Management Program
Indigenous and Public Engagement Program
Health and Safety Management Program
Security Management Program
Asset Management Program
Contractor Management Program
Regulatory Reporting Requirements Procedure

#### 6.2 External

#### <u>Federal</u>

Nuclear Safety and Control Act

Uranium Mines and Mills Regulations

Radiation Protection Regulations

Nuclear Substances and Radioactive Devices Regulations

General Nuclear Safety and Control Regulations

Canadian Nuclear Safety Commission. REGDOC 2.10.1 Nuclear Emergency Preparedness and Response

Canadian Nuclear Safety Commission. REGDOC 2.10.2 Fire Protection

Environmental Emergency Regulations

Transportation of Dangerous Goods Regulations

#### **Provincial**

The Saskatchewan Employment Act, 1993

The Occupational Health and Safety Regulations 1996

The Mines Regulations, 2018

The Fire Safety Act

The Fire Safety Regulations

The Wildfire Act



## The Wildfire Regulations

The Environmental Management and Protection Act, 2010

The Hazardous Substances and Waste Dangerous Goods Regulations

#### <u>Other</u>

Mining Associated of Canada. Towards Sustainable Mining Crisis Management and Communications Protocol

National Fire Protection Association (NFPA). 600 – Standard on Facility Fire Brigades

National Fire Protection Association (NFPA). 1561 – Standard on Emergency Services Incident Management System and Command Safety