Denison Mines Corp.
Wheeler River Operation

Facility and Equipment Management Program

Document # 7

Version 2

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Approval for Use

Version	Date	Description of Activities	Author	Reviewer	Approver
Version 1	15-Sept-2023	For CNSC Review			
Version 2	05-May-2025	For CNSC Review			

Revision History

Version	Date	Description of Revision
Version 1	15-Sept-2023	For CNSC Review
Version 2	05-May-2025	2.1 Risk Management – *moved some content into Asset Maintenance Plan Development Procedure, introduced Asset Management Plan.* 2.1.2 Operations Process Risk Assessment – *added section, introduced and referenced Operations Management Plan.* 2.3.1 Human Factors Engineering – *Introduced and referenced Human Factors Engineering Procedure* 2.5 Asset Onboarding – *moved content to Asset Management Plan.* 2.6 Planning Operations Activities – *new section, referenced Operations Management Plan.* 2.7.3 Operations Resources – *new section, referenced Operations Management Plan* 2.10 Vendor Management – *removed some information, introduced and referenced Supply Chain Management Plan.* 3.1 Asset Maintenance – *moved some content into Asset Management Plan.* 3.2 Aging Management – *moved content into Asset Management Plan.* 3.3 Asset Type Specific Plans – *moved content into Asset Management Plan.* 3.5 Inventory Control – *moved some content into Supply Chain Management Plan.* 3.5 Operations Execution – *new section, referenced Operations Management Plan.* 4.2.4 Operations Performance Evaluation and Analysis – *new section, referenced Operations Management Plan.* 5.2 Continual Improvement – *moved content into subsection 5.2.1 Asset Management Improvement* 5.2.1 Asset Management Improvement – *new subsection, referenced Asset Management Plan.*

		5.2.2 Operations Process Improvement – *new subsection, referenced Operations Management Plan.* 6.1 Internal – *updated reference table.*

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Figures

Introduction

The *Facility and Equipment Management Program* (the Program) is one of twelve Program documents that comprise the Management System for the Wheeler River Operation (the Operation). The *Facility and Equipment Management 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 Program is organized according to the 'Plan-Do-Check-Act' iterative process to incorporate continual improvement in all stages of the Program.

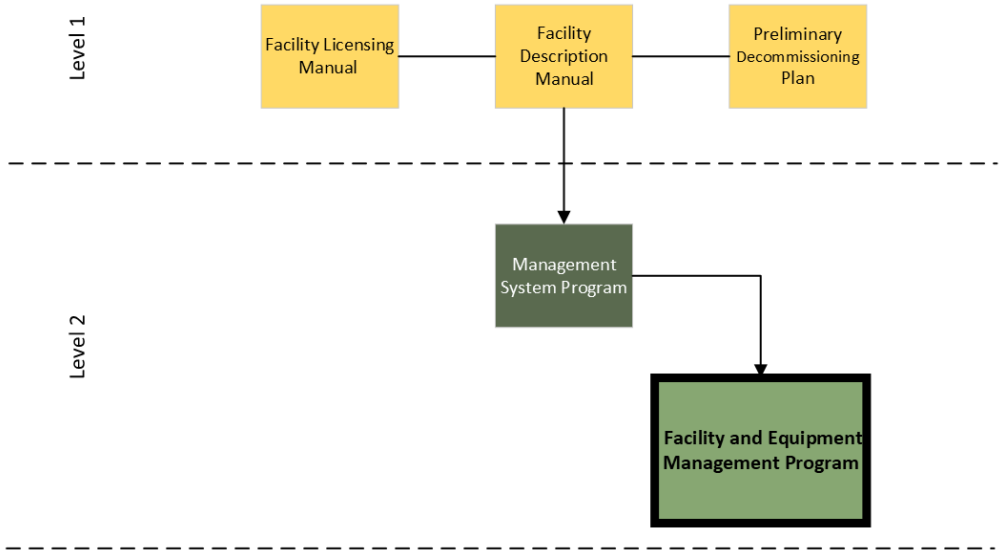

Figure 1: Program shown within Document Framework for the Wheeler River Operation

1.1 Purpose

The purpose of this Program is to ensure that work activities are identified, planned, and controlled, and ensure that design, selection, procurement, onboarding, maintenance, and operation of site facilities and equipment are carried out under controlled, optimized conditions in a consistent manner.

1.2 Scope

A risk-based, scaled approach to program implementation is taken for all physical assets owned, leased, constructed, commissioned, or operated by the Wheeler River Operation.

Physical assets included in this Program may include constructed or purchased goods, buildings, structural elements, mobile and fixed plant equipment, tools, inventory, and other physical infrastructure. Inventory is defined to include maintenance spare parts, consumables, reagents, and related components. Operating activities refer to processes and procedures used to operate the Wellfield, Processing Plant, Utilities, Industrial Wastewater Treatment Plant, and other licensed facilities.

Leased land, non-physical (knowledge) assets, and financial assets are excluded from the scope of this program.

Contractor purchased and maintained equipment is not within the scope of this program. Contractors may be required to demonstrate a management system meeting the requirements of the appropriate regulations.

1.3 Program Overview and Principles

This Program is designed to align with Denison's overall goal of protecting and promoting the health, safety, well-being of people, and environment through all phases of the project.

This Program organizes facility and equipment management in a documented and auditable process, and encompasses:

- Engineering,
- Construction,
- Commissioning,
- Operations,
- Asset Management,
- and Supply Chain.

Work conducted at the Wheeler River Operation is planned. Routine work conducted at the Wheeler River Operation is performed as documented in established procedure and work instructions. The procedures and work instructions indicate "what" the work activity is, "when" the work activity is to occur and at what frequency, "who" is responsible to complete the work activity, and "how" the work is to be performed.

The procedures and work instructions identify the resources (e.g., tools, materials, PPE) that are required for the work activity, the critical tasks of the work activity that are required to be verified (including verification methods and acceptance criteria), and other documents that are required or referenced for the work activity.

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,* the *Uranium Mines and Mills Regulations.* The Program also follows guidance and requirements in the Canadian Nuclear Safety Commission (CNSC) REGDOC 2.5.1, *General Design Considerations: Human Factors,* REGDOC 2.5.4, *Design of Uranium Mines and Mills: Ventilation Systems,* and REGDOC 2.6.3, *Aging Management.*

Additionally, the Program meets provincial requirements including the *Occupational Health and Safety Regulations,* and *The Mines Regulations, 2018.*

1.5 Terminology

1.5.1 Definitions

Term	Definition
Employees	Worker employed directly by Denison Mines
Contractors	Workers employed by a company outside of Denison Mines
Workers	Defines all workers at the Operation, including both Denison employees and contractors
Third Party	Independent evaluations conducted by external organizations

1.5.2 Acronyms and Abbreviations

Acronym or Abbreviation	Term
APEGS	Association of Professional Engineers and Geoscientists of Saskatchewan
CNSC	Canadian Nuclear Safety Commission
KPI	Key performance indicator
PPE	Personal protective equipment
QA	Quality assurance
RFQ	Request for quotation
SAT	Systematic approach to training
SME	Subject matter expert

Plan

2.1 Risk Management

All assets are assigned an asset criticality rating that establishes the impact posed by a potential failure. The rating is based on the consequences of failure and is assigned by subject matter experts knowledgeable in the design and operation of the system of assets. This is accomplished by evaluating the impact of failure across several dimensions, including health and safety, environmental consequences, operational disruption, repair cost, and downtime

The consequence of failure considers both direct impacts arising from the failure as well as impacts related to the resulting downtime of assets and systems. The results of the asset criticality rating process are used to inform the maintenance methods employed for the asset. A comprehensive, risk-based strategy is developed by equipment subject matter experts (SME), as outlined in the *Asset Maintenance Plan Development Procedure*.

Maintenance plans are developed for all moderate and high rated assets in compliance with the risk-based strategy and all regulatory requirements as outlined in the *Asset Maintenance Plan Development Procedure.*

2.1.1 Risk Register

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

The risk register may include information such as: risk identification, risk assessment, risk analysis, risk evaluation, risk prioritization, risk mitigation, risk monitoring and review. Further details on the risk register are provided in the *Risk Management Procedure* .

2.1.2 Operational Process Risk Assessment

Building upon the proactive risk management approach and the central role of the Risk Registry as outline for asset-related risks, Denison employs formal Operational Process Risk Assessment methodologies. These assessments specifically focus on identifying and analysing hazards and risks associated with operational processes, utilizing techniques such as Hazard and Operability (HAZOP) studies, Job Hazard Analysis (JHA), and Field Level Hazard Analyses (FLHAs).

These systematic reviews involve multidisciplinary teams analyzing process operations to identify potential deviations, assess their likelihood and severity using the established risk matrix, and determine necessary control measures. The outcomes of these assessments, including the identified risks and their corresponding controls, are documented within the central Risk Registry, ensuring a consolidated view of both asset and process-related risks. This information is then utilized for informed decision-making, change management, and continuous improvement initiatives, consistent with the broader risk management processes detailed in the *Risk Management Procedure.*

2.2 Objectives and Targets

Objectives and targets of this Program are established to drive measurable improvements, control significant risks, and promote continual improvement across all areas of focus of the Program.

These objectives and targets will be documented, tracked using Key Performance Indicators (KPIs), and their performance will be communicated at regular intervals (ie. during management reviews).

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

2.3 Engineering Design

Engineering design at Denison, or completed by contractors on Denison's behalf, is managed in accordance with the requirements of *The Engineering and Geosciences Professions Act*, including the regulatory bylaws and code of Ethics. Engineers responsible for approving and validating work at Denison will be registered as Professional Engineers with APEGS.

Engineering management, including risk and hazard assessment and design review standards, is further detailed in the *Engineering Design Control Plan*. Denison is accountable for the upkeep of the plan, ensuring work is completed by licensed professionals with sufficient experience for the work scope, and supervision of engineering work at Denison. Responsible members are assigned by the permit holder to each major discipline in sufficient numbers to oversee professionals under their area of responsibility.

All engineers completing design work for the Wheeler River Operation are responsible to:

- Follow the *Engineering Design Control Plan* and ensure professionals under their direction are trained in it;
- To participate in quality control and assurance processes for engineering work they are involved in, under the direction and accountability of the responsible member;
- Authenticate and validate engineering and geoscience work in accordance with APEGS standards;
- Maintain good-standing Professional status; and
- Monitor and report any non-conformance to the responsible member.

2.3.1 Human Factors Engineering

As stated in the *Human Performance Management Program,* Denison considers human factors in facility design to help assure that interfaces between humans and structures, equipment, or substances during licensed activities occur without unacceptable impacts on workers, the public, or the environment. Implementation and verification of human factors engineering is introduced in the *Engineering Design Control Plan* and further expanded upon in the *Human Factors Engineering Procedure*.

2.4 Asset Selection

Asset selection begins during the design process, with the goal of maintaining the safety of workers and the environment, complying with regulatory requirements, and supporting reliable system operation. It may include comparative evaluations of potentially suitable assets using a standardized assessment tool. Consideration will be given to worker health, safety, environmental protection, life cycle costs, social

considerations, and expert input. Asset selection is managed as outlined in the *Engineering Design Control Plan.*

2.5 Asset Onboarding

A systematic approach is used prior to and during asset fabrication and procurement processes to capture relevant data to enable safe and reliable asset operation. The asset onboarding process is detailed in the *Asset Management Plan.*

2.6 Planning Operating Activities

Denison will establish a comprehensive framework for planning operational activities, designed to ensure they are conducted safely, effectively, and in compliance with all requirements. This framework encompasses: establishing achievable Production Plans and Schedules; systematically developing and managing vital Operational Documentation; ensuring all required resources are available for Operations; and defining the verification process required to confirm Operational Readiness before starting work or implementing change.

Refer to the *Operations Management Plan* for more details.

2.7 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.

2.7.1 Roles and Responsibilities

This section outlines the specific roles and responsibilities within the Program, including senior management, site supervisor, and other workers with varying 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. For more detail on the roles and responsibilities of the Wheeler River Operation please refer to sections 2.4 and 2.5 of the *Management System Program* where an overview of the organization and departments is provided.

2.7.2 Facilities and Equipment

Facilities and equipment to support the effective implementation of the Program and its related practices are provided to Program staff and applicable workers. The facilities and equipment used for construction, inspection, and maintenance will be of sufficient size and quantity for the work performed and maintained in good working order.

2.7.3 Operations Resources

A planned approach is used for determining, allocating, and managing the human resources and associated operational resources required for the safe, compliant, and efficient operation of the facility. Planning ensures that appropriately skilled personnel and necessary tools are available to meet production targets and manage operational conditions.

Refer to the *Operations Management Plan* for more details.

2.7.4 Legal and Other

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

- Federal and provincial legislation; and
- Licence conditions.

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 *Facility and Equipment Management Program* and its supporting Plans, Procedures, and Work Instructions are required.

2.8 Training and Competence

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

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

2.9 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. Documents and records are readily accessible to those who require them.

Further information on documentation and records management is provided in the *Management System Program.*

2.10 Change Management

Change is managed to protect workers, the environment, and property, and to ensure that regulatory requirements are met. Maintenance work may result in a change to assets if the work results in a change to equipment specifications, operating set points, or work procedures. Work is assessed during the planning process to determine if it qualifies as a change to equipment. Changes to equipment are managed to ensure the change is clearly defined, risks are assessed, managed, and resulting changes to documentation and/or training are completed.

The Operation wide change management process including steps to follow is outlined in the *Management System Program* and the *Change Management Procedure*. Management of changes involving design and installation of new assets are described through the *Engineering Design Control Plan*.

2.11 Vendor management

The purpose of supply chain management activities is to ensure that safety critical items and services required for various construction and maintenance activities are procured and arrive at the right location in a timely manner. Vendors are selected for request for quotation (RFQ) based on prequalification, previous experience, and compliance with the work requirements.

The proposals received from the vendors are collected and distributed to the project managers/requisitioners for technical and commercial evaluation.

Bid evaluations consist of a commercial and technical evaluation. Evaluation criteria and weighting are dependent on the specific assets and project requirements. The result of the bid evaluation is to recommend the successful vendor to be awarded the contract.

For more details, refer to the *Supply Chain Management Plan*.

2.12 Contractor Management

Contractors are responsible for ensuring work adheres to the requirements and standards established by Denison in this Program, as well as the *Health and Safety Management Program*, *Radiation Protection Program*, and any other documentation identified in their contract. Denison is responsible for providing this information to all contractors, and to verify compliance with these requirements.

For more details, refer to the *Contractor Management Plan.*

Contractors performing maintenance work, including equipment inspections, engineering, or work execution, are subject to the requirements of this Program.

Contractors are responsible for ensuring that any equipment, facilities, or other assets owned by or under the control of the contractor are operated and maintained in a manner that maintains safety of the contractor and other workers, and protection of the environment. Contractor equipment is not subject to the requirements of this program but may be audited by Denison to ensure that sufficient processes are in place to maintain the equipment in safe operating condition.

Do

3.1 Asset Maintenance

Asset maintenance broadly refers to actions taken to keep assets in safe operating condition, extend their reliable lifespan, or return them to safe operation following failure.

The overall maintenance process follows a structured workflow and systematic approach to defining asset specific maintenance plans and controls. For more details on these processes, refer to the *Asset Management Plan*.

3.2 Aging Management

Aging Management program establishes inspection frequencies and methodologies to detect degradation before it becomes a hazard or significant risk. When inspections reveal anomalies or deterioration, assessments determine if the equipment remains safe to operate, needs modified operating conditions, requires repair, or must be replaced.

For more details, refer to the *Asset Management Plan.*

3.3 Construction & Commissioning Management

The *Construction Management Plan* and *Commissioning Management Plan* provide a framework used to effectively and consistently manage these activities to achieve design requirements of the facilities.

Denison is responsible for the construction, commissioning, and operating organizations, which may be internal to Denison or from a contracted organization.

Construction and commissioning activities are carried out in accordance with Denison's Management System, including this program, the *Management System Program*, the *Health and Safety Management Program*, the *Radiation Protection Program*, the *Training Management Program*, and all other related program documentation.

Throughout construction and commissioning activities, Denison's management is accountable to:

- Confirm all facilities are built in accordance with design basis, regulatory requirements, and applicable codes and standards;
- Maintain accountability for safe construction and operation of all facilities, including those constructed, commissioned, or operated by contractors on Denison's behalf;
- Provide a single point of contact for communication with CNSC and other regulators for all matters pertaining to construction;
- Ensure construction safe work plans and procedures are established;
- Ensure all inspections, tests, and verification required by design basis or regulators are performed, documented, evaluated, and reported on as required; and
- Maintain a listing of regulatory oversight requirements, including jurisdictional boundaries and responsibilities.

3.3.1 Construction

A readiness review will be completed prior to start of major construction, to verify management systems, planning, procedures and training, and hazard identification and control measures have been completed and are sufficient for control of construction activities.

Construction planning, scheduling, and sequencing is completed prior to construction, and includes provisions for witness and hold points for internal review and verification, as well as regulatory inspection where required.

Construction management is further detailed in the *Construction Management Plan*.

3.3.2 Commissioning

Denison oversees the organization, planning, execution, and assessment of commissioning activities at the Wheeler River site, whether performed by Denison or by contractors.

During commissioning:

- The construction organization will verify that all structures, systems, and components have been constructed as per design and quality assurance requirements are satisfied;
- The commissioning organization will test all structures, systems, and components important to safety and verify the facility is ready for safe operation; and
- The operating organization will satisfy itself that the systems transferred are safe to operate and will accept responsibility for operation and maintenance of transferred facilities in accordance with the design intent.

Commissioning management is further detailed in the *Commissioning Management Plan*.

3.3.3 Construction and Commissioning Contractors

Denison is accountable for management of contractors and subcontractors to ensure they meet contractual obligations. Denison maintains records detailing its oversight activities, and reports on incidents or deviations that affect, or have the potential to affect, quality of construction, or current or future operational safety.

Contractors and vendors are managed in accordance with sections 2.8 & 2.9 of this program. Vendors and contractors for safety-sensitive work are chosen from the controlled list of approved suppliers. Vendor performance is tracked and used to inform future procurement decisions. Contractor-purchased equipment is subject to the same requirements as outlined in section 2.8.

3.3.4 Construction Security

Site security is managed to prevent both intentional and unintentional unauthorized acts directed at construction activities, that could impact current and future operational safety. Security requirements are reviewed on an ongoing basis, and controls put in place to address current site risks.

Security of facilities turned over to operation are managed in accordance with the *Security Management Program.*

3.4 Inventory Control

Inventory control ensures that necessary parts, consumables, bulk reagents, spare assets, and assemblies required for safe, reliable operation of the facilities are properly managed. Detailed procedures detailing all aspects of inventory control are documented in the *Supply Chain Management Plan.*

The key aspects of inventory control include:

- **Goods Receipt and Storage:** All incoming goods are systematically received, inspected for quality and adherence to procurement requirements, and inventoried. Items requiring special handling are treated accordingly, supplier documentation is retained, and goods are stored in controlled areas designed to prevent damage, degradation, or loss, meeting any specified conditions (e.g., temperature control).
- **Inventory Level Management:** Appropriate stock levels for inventory items are determined based on operational and maintenance needs, supplier lead times, and risk analysis, subject to an approval process and routine reviews. Inventory accuracy is verified through regular checks (e.g., cycle counts), ensuring alignment between records and physical stock.
- **Inventory Critical Spares:** Critical Spare inventory stored onsite, is maintained in good working condition, with any required maintenance tasks scheduled accordingly. Specific management processes are applied to critical spares – essential items identified via the - *Asset Management Plan* – to ensure their availability and reliability in mitigating the impact of key asset failures.

3.5 Operations Execution

This section outlines the framework for executing operating activities safely and efficiently at the Operation. The foundation of execution is the adherence to approved Standard Operating Procedures (SOPs) and work instructions for assigned tasks.

Personnel actively engage in continuous process monitoring and control, using the Distributed Control System (DCS) and regular field rounds to track performance and make timely adjustments. This includes proactive implementation of in-process quality control measures through designated sampling and testing work plans.

Operators are trained and equipped to manage non-standard situations, following established procedures for handling abnormal operating conditions or process upsets to ensure safe stabilization or shutdown.

Effective communication protocols, particularly formal shift handover procedures, ensure seamless transitions and continuity of operations. Detailed recording of actions, events, and process data in the data historian is mandatory for traceability and learning.

For more detailed information on the Execution of Operations Activities, see *Operations Management Plan*.

Check

4.1 Work Closeout

The following section applies to assets in operation. Assets in construction will instead follow the commissioning process outlined in section 3.4.

Closeout and work verification is completed with safety as the paramount consideration guiding all decisions and actions. Required inspections and checkpoints are identified in the plan and carried out during work and at close-out as required. A competent worker must be assigned to perform verification of activities. Verification records are kept with the work order history.

Any information requiring update is recorded on the work order and returned to planning. Examples include bill of materials errors, incorrect jobs steps or equipment requirements, or suggested improvements to the job plan. The planning department is accountable to ensure that this information is recorded and assessed for improvements to future work or standard job plans.

4.2 Monitoring and Measurement

Performance relevant to this Program is monitored and measured against established objectives and targets (identified in Section 2.2). Denison will monitor, measure, analyze, and evaluate its facility and equipment management performance based on a defined process outlined in the *Management System Program*.

All monitoring and measurement activities must also meet defined quality assurance and quality control requirements outlined within relevant Plans as part of this Program.

Processes associated with monitoring and measurement are outlined further in the *Management System Program.*

4.2.1 Asset Based Targets

The Operation will establish relevant KPIs related to the health of the maintenance system, and their implementation at Wheeler River. KPIs adhere to the following guiding principles:

- They are relevant to the current state of the asset management program and will change over time as the program evolves;
- They provide clear line-of-sight to organization targets and KPI's and are tied to operational targets established as part of the management review process; and
- They include targets for required areas of regulatory compliance.

Performance monitoring KPI's are used to inform program improvement opportunities and included in targets and objectives for future years.

4.2.2 Vendor Performance Feedback

Performance reviews and audits of key vendors for goods and services are performed, with audit requirements based on the importance and risk of supplied goods and services. Vendor performance is recorded by end-users, and past performance is used to inform future purchasing decisions for all safety critical goods and services.

Vendors are evaluated during and after the completion of work, in accordance with the *Supply Chain Management Plan.* Vendor deficiencies are identified and documented using the non-conformance process outlined in the *Management System Program*. The supplier must perform corrective actions to resolve the non-conformances. Failure to resolve the non-conformances may result in the vendor's status being removed from the approved supplier listing.

4.2.3 Inventory Assessment

Site inventory is routinely assessed for shelf life and inventory turns. Assessment results are used to inform changes in stocking levels, prevent deterioration of goods in storage, and maintain necessary levels of parts and consumables.

Goods identified as critical spares are not subject to inventory turn assessments and are maintained in good working condition or replaced as required by the maintenance strategy.

4.2.4 Operational Performance Evaluation and Analysis

The Operation systematically evaluates process performance, analyzing process data, and assuring product quality. The primary goal is to ensure the plant operates effectively and efficiently, meeting predefined targets while identifying opportunities for improvement.

Key Performance Indicators (KPIs) related to production (e.g., throughput, utilization) and efficiency (e.g., reagent consumption, water usage) are continuously tracked. Performance is measured against established targets and historical benchmarks using data from control systems and operational logs. These results are regularly summarized and communicated to relevant teams and management.

Beyond routine KPI tracking, deeper analysis of process data from sources like the data historian, DCS logs, operator logs, and maintenance records is conducted, often in collaborative daily reviews with subject matter experts. Analytical techniques such as trend analysis and mass balancing are employed to understand process variability, troubleshoot operational issues, determine root causes, and uncover potential optimizations, providing input for process improvement initiatives.

Quality Assurance activities provide oversight of the entire quality process. This involves reviewing trends in quality control data, monitoring overall compliance with final product specifications, verifying adherence to sampling/testing plans, analyzing causes of off-spec production, and evaluating the overall effectiveness of the quality control system to ensure consistent product quality.

For more detailed information on the Evaluations and Analyses processes used for Operations, see *Operations Management Plan*.

4.3 Inspections and Audits

Denison will conduct internal audits of the *Facility and Equipment Management Program* to determine if Denison is complying with the requirements set out in the Program and to determine if the Program is being effectively implemented and maintained.

The internal audits will follow the process and procedures outlined in the *Management System Program.*

4.4 Management Review

The *Facility and Equipment Management Program* will be reviewed by Denison management in accordance with a defined frequency to determine if the defined program is meeting its objectives, is effective or needs adjustment. Relevant Program items that Denison management will review may include:

- Suitability, adequacy, and performance of Program objectives and targets;
- Upcoming or new legislation related to asset protection;
- Recent or planned changes in facility operations;
- Results of monitoring in relation to meeting performance objectives and targets;
- Results of audits and inspections in relation meeting performance objectives and targets;
- Communications from interested parties;
- Adequacy of resources; and
- Any needs for program adjustment.

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.*

4.5 Reporting

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

External reports to regulators will be produced in accordance with regulatory requirements.

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 incidents, near-misses and deviations from the *Facility and Equipment Management Program.* Non-conformities can also be identified during the 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 the *Facility and Equipment Management Program* will be identified and addressed to enhance operational performance. The continual improvement process for this Program follows the overall continual improvement process outlined in the *Management System Program* and the supporting procedures. Continual improvement may also include updating Program objectives and targets based on changing circumstances or new information. Any changes identified through the continual improvement process will be implemented in a systematic and controlled manner.

5.2.1 Asset Management Improvement

Breakdown and failure information is trended to identify systems and equipment having an adverse effect on safety and reliability. Failure trends are routinely reviewed by reliability engineering subject matter experts. Based on failure trends, changes may be recommended at the design level (change in assets), the maintenance strategy level (changes in maintenance plans and tools), or the operational level and will follow the *Change Management Procedure*.

For more details on the Asset Management Improvement process, see *Asset Management Plan*.

5.2.2 Operations Process Improvement

Operations process improvement focuses on enhancing the efficiency, safety, and sustainability of the processing plant. This involves optimizing extraction, recovery, and production while minimizing environmental impact, and operational costs.

For more details on the Operations Improvement process, see *Operations Management Plan*.

5.3 Asset Disposal

Asset disposal is the process for removal of existing facilities, equipment, or inventory items from service or from the Wheeler River Operation.

Asset disposal includes change management to ensure the removal does not affect safety or reliability of site assets. Once approval for disposal is obtained, the asset disposal process includes archiving of maintenance records and plans, disposition of obsolete inventory, and disposal of assets in keeping with the requirements of the *Waste Management Program.*

References

6.1 Internal

Document Name
Asset Maintenance Plan Development Procedure
Asset Management Plan
Commissioning Management Plan
Construction Management Plan
Contractor Management Plan
Engineering Design Control Plan
Human Factors Engineering Procedure
Human Performance Management Program
Maintenance Work Management Procedure
Management System Program
Operations Management Plan
Risk Management Procedure
Supply Chain Management Plan

6.2 External

Nuclear Safety and Control Act

General Nuclear Safety and Control Regulations

Uranium Mines and Mills Regulations

Canadian Nuclear Safety Commission (CNSC) REGDOC 2.5.1, *General Design Considerations: Human Factors*

Canadian Nuclear Safety Commission (CNSC) REGDOC 2.5.4, *Design of Uranium Mines and Mills: Ventilation Systems*

Canadian Nuclear Safety Commission (CNSC) REGDOC 2.6.3, *Aging Management*

Occupational Health and Safety Regulations

The Mines Regulations, 2018