

Denison Mines Corp. Wheeler River Operation

Human Performance Management Program

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



1 Introduction

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

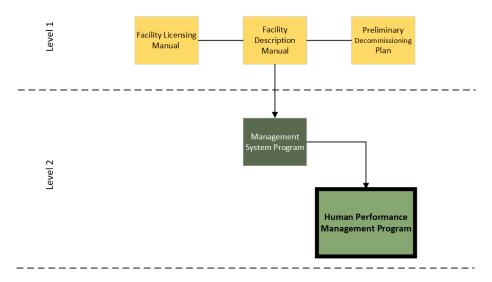


Figure 1: Program shown within Document Framework for the Wheeler River Operation

1.1 Purpose

The Program describes and documents how Denison manages human performance as it occurs throughout all the Operation's management system. This includes interactions with all of the Operation's Programs, processes, and principles.

Denison takes a systemic approach to human performance management by analyzing the interaction and relationships between workers, technology, and Denison's organization to provide the support necessary to safely and effectively carry out their duties.

1.2 Scope

This Program applies to workers including contractors performing work at the Operation, and includes planning, delivering, evaluating, and improving processes to effectively manage and improve human performance.

The *Human Performance Program* is integrated with all other Programs that are part of the Operation's management system. Aspects of human performance management are addressed across policies, plans, and procedures throughout the entire management system.



1.3 Program Overview and Principles

Program principles applied to development, implementation, maintenance, and application of other Operation Management System processes include:

- Managing Human Factors (see section 3.1 of this Program);
- Relevant training and competence (see section 2.4 of this Program as well as the *Training Management Program* for more information);
- Employee performance and evaluation (see section 3.2 and section 4 of this Program);
- Fitness for duty (see section 3.3 of this Program);
- Use of experience process (see section 5 of this Program as well as the *Management System Program* for more information);

1.3.1 Implementation of Systemic Approach

Denison considers human performance within the context in which people work, viewing the business as a system. Denison uses a systemic approach when analyzing, recording, and evaluating human, technology, and organizational (HTO) factors associated with:

- events and problems;
- work that is known to be difficult or challenging;
- work that went well (cases of performance excellence);
- feedback and suggestions for improvement from a range of sources;
- proposed changes to be made;
- outcomes of the changes made.

For more information on how Denison aligns objectives and targets to these factors and monitors and measures them within the system of the Wheeler River Operation please see sections 2.2 and 4.1.

1.4 Compliance with Regulatory Requirements

This Program is compliant with the *Nuclear Safety and Control Act (SC 1997, c.9)* and associated regulations, including the *General Nuclear Safety and Control Regulations (SOR/2000-202)*, the *Uranium Mines and Mills Regulations (SOR2000-206)*. The Program also follows guidance and requirements in the Canadian Nuclear Safety Commission (CNSC) REGDOC 2.1.2, *Safety Culture*, REGDOC 2.2.1 *Human Factors*, REGDOC 2.2.2, *Personnel Training*, and both REGDOC 2.2.4 *Fitness for Duty: Managing Worker Fatique*, and *Fitness for Duty, Volume II: Managing Alcohol and Drug Use*.

Additionally, the Program meets provincial requirements from The Saskatchewan Employment Act.



1.5 Terminology

1.5.1 Definitions

Term	Definition	
Contractors	Workers employed by a company outside of Denison Mines	
Employees	Worker employed directly by Denison Mines	
Human Factors	Factors that influence human performance as it relates to the safety of a nuclear facility or activity over all phases, including design, construction, commissioning, operation, maintenance, and decommissioning.	
Key performance indicator (KPI)	A quantifiable measure used to evaluate the success of a process or organization in meeting performance objectives. A KPI must be consistently measurable, comparable to a target, and display change over time (i.e., trending).	
Safety Culture	Values, rules, and common understandings that influence workers' perceptions and attitudes about the importance that Denison places on safety.	
Third Party	Independent evaluations conducted by external organizations	
Workers	Defines all workers at the Operation, including both Denison employees and contractors	

1.5.2 Acronyms and Abbreviations

Acronym or Abbreviation	Term
CNSC	Canadian Nuclear Safety Commission
JHA	Job Hazard Analysis
FLHA	Field Level Hazard Assessment
KPI	Key Performance Indicator
SAT	Systematic Approach to Training



2 Plan

2.1 Risk Management

Risk management identifies, assesses, and controls risks to workers, the environment, systems, facilities, and equipment associated with a task or process. The Operation adopts a consistent and integrated approach to risk management to identify, manage, and mitigate risk.

This process includes identifying the risks introduced by human factors at the Operation that could affect workers, the environment, or the public, determining the significant of any associated risks, and mitigating the risks to acceptable levels by applying controls.

Processes associated with documenting risks and controls are further described in the *Risk Management* procedure.

2.1.1 Hazard Identification

Health and safety hazards are conditions or agents that can potentially cause harm in the form of physical injury, illness, or disease from differing work environments, conditions, circumstances, or the characteristics of physical, chemical, biological, or psychosocial agents.

Hazards are identified using appropriate types of assessment which are documented and tracked. Typical assessments include job hazard analyses (JHAs) and field level hazard assessments (FLHAs). Ensuring workers have the proper skills and abilities to safely execute the required tasks is accomplished through training and experience. Further details on the management of health and safety at the Operation are provided in the *Health and Safety Management Program*.

2.1.2 Risk Register

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

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 *Management System Program*.

2.2 Objectives and 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.

Objectives and targets related to human performance will be set to better control existing significant risks and continual improvement of current practices. These objectives and targets are tracked using KPIs. Primary targets of the Program include, but are not limited to:

- Ensuring commitment to worker safety is met;
- Creating clear expectations of performance for employees and contractors; and
- Worker performance is continually improving.



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 Safety Culture

Safety culture is defined as the characteristics of the work environment, such as the values, rules, and common understandings that influence workers' perceptions and attitudes about the importance that Denison places on safety.

Safety of workers, the public, and the environment is of paramount consideration guiding decisions and actions. A primary responsibility of leadership is promoting a strong safety culture and providing the resources and processes to support work practices that demonstrate the commitment to safety. Further information on the commitment to safety culture by Denison's leadership can be found in section 2.3 of the *Management System Program*, and processes that help foster and assess safety culture – such as the DMC-HS-164 *Field Leadership* procedure - are outlined in greater detail in the *Health and Safety Management Program*.

2.3.2 Roles and Responsibilities

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

Denison's Vice President of Operations is responsible for 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.

Operations Management

- Ensure adequate resources and support is in place to fulfill desired human performance and Program implementation;
- Confirm integration of the program requirements into Operation processes;
- Approving annual objectives and targets for this Program that consider the systemic analysis of factors related to human performance;
- Ensure alignment with corporate goals, vision, and core values;
- Promote awareness and ensure supervisors are adhering to the Program;
- Encourage feedback and suggestions for improvements to the Operation; and
- Deliver specified programs and training;

Human Resources Management

Oversee the development and implementation of this Program;



- Ensure delivery and implementation of relevant training and awareness material according to internal and external requirements;
- Maintain relevant materials and records;
- Confirm oversight of human performance through monitoring and auditing activities; and
- Report on Program performance and effectiveness.

Workers

- Participating in training sessions as required; and
- Confirm compliance with human performance requirements by following Denison policies and processes and feel enabled to raise any concerns to management freely.

2.3.3 Facilities and Equipment

Human factors are considered in design, construction, and operation of facilities and equipment at the Operation, and they are maintained with consideration for worker health, safety, wellbeing, and compliance with legal requirements (see Section 3.1).

The Facility and Equipment Management Program and the plans and procedures derived from it – such as the Engineering Design Control Plan - provides greater detail on human factor considerations and the design control process for the Wheeler River Operation.

2.3.4 Emergency Management

Denison provides processes and structure for accidents and emergencies at the Operation through implementation of it's *Emergency Response and Preparedness Program*. Workers are prepared and trained to handle emergency events and situations that threaten the health and safety of workers, local Indigenous groups and communities, the environment, and Operation infrastructure. The *Emergency Response and Preparedness Program* provides the framework for the site emergency response plan, transportation emergency response, and corporate crisis management.

2.3.5 Legal and Other Requirements

Denison is committed to complying with all applicable legal and other requirements related to human performance management. 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 human performance compliance obligations are monitored and evaluated to determine if updates to this 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. The *Training Management Program* and training procedures ensure the SAT



method is followed and workers are prepared and supported to complete their day-to-day work. Training requirements are monitored to verify workers have necessary training when needed to maintain competency and work safely.

Denison corporate policies outline company values, culture, and employee expectations which include:

- Code of Ethics
- Whistleblower Policy
- Anti-Bribery Policy
- Disclosure Policy
- Environment, Health, Safety and Sustainability Policy
- Workplace Violence and Harassment Policy
- Workplace Substance Management Policy
- Information Technology and Acceptable Use Policy
- Travel and Expense Policy

All employees (full-time, seasonal, and part-time) are provided with a copy of these policies and are asked to sign an affirmation when they are hired. In addition, annually the policies are circulated to all employees with an annual affirmation request.

All new full-time employees (not seasonal) are required to complete training modules within the first few weeks of their start date. These modules may include but are not limited to:

- Workplace harassment and violence (CDN)
- Anti-bribery training
- Ethics and code of conduct
- Drug free workplace
- Cybersecurity

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

2.4.1 Personnel Certification

Denison ensures the Operation upholds a sufficient number of qualified and certified workers to carry on the licensed activity safely and in accordance with the *Nuclear Safety and Control Act*.

Through the *Training Management Program* the Operation confirms that all workers are appropriately trained and qualified to carry out their tasks safely. This includes ensuring that certifications are up to date, and that those requiring certification or recertification are identified prior to requirement and made fully qualified before working independently.

2.5 Documentation and Records Management

Denison establishes and maintains documented plans, procedures, and work instructions to ensure effective implementation of the management system. 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 the implementation of the Program and completion of licensed activities. Examples of records generated relevant to the Program may include:



- Program specific plans, procedures, and work instructions;
- Objectives and targets of the program (see 2.2);
- Results of analyses of human performance monitoring and measuring, internal audit results, and management review (see sections 4.1, 4.2, 4.3);
- Relevant resources to support workers (i.e. course outlines and evaluation records see
 Training Management Program);
- Human resource related records for workers at the Operation; and
- Records and outcomes of relevant emergency events, security events, accidents, and inspections (e.g., completed inspection forms, incident reports, etc. – see Emergency Preparedness and Response Program and Security Management Program).
- Results of use of experience and continual improvement process, and findings of continual improvement for human performance and the organization (see 5.2, and 5.3).

Documentation and records containing confidential and private personnel will be kept secure and with restrictive access to be handled by Denison's Human Resources department only.

Further information on documentation and records management is provided in WRE-QUA-100 *Document Management* procedure and WRE-QUA-101 *Records Management* procedure as part of the *Management System Program*.

2.6 Communication

Communication across Denison is a critical element of human performance in order to promote a just culture where workers are empowered to engage in safe work practices. Human performance information such as training and worker requirements, input into design, information pertaining to fitness for duty, performance indicators, feedback opportunities, and training opportunities and results will be shared.

Internal and external communication principles and processes are further outlined in WRE-QUA-113 *Communication* procedure, as part of the *Management System Program*. Avenues of internal communication will be established within relevant departments to ensure that the flow of information occurs across the organization.



3 Do

Denison uses a root cause analysis to look deeply into issues, determining the factors that impacted the behaviour such as human elements (physical, physiological, cognitive, and social aspects), technology, organizational and management structures, policies, training, and others. This systemic approach to the analysis of issues is taken to strengthen safety and organizational learning across Denison.

The following subsections contribute to the management of human performance at the Operation.

3.1 Managing Human Factors

For the purposes of this Program, Human Factors are defined as those factors that influence human performance as it relates to the safety of a nuclear facility or activity over all phases, including design, construction, commissioning, operation, maintenance, and decommissioning.

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. Human factors engineering is a component addressed in the *Facility and Equipment Management Program* and in greater detail in the *Engineering Design Control Plan*. Examples of human factors addressed by this Program include, but are not limited to, staffing provisions, work schedules, training, and human performance.

3.2 Performance Improvement

Managers and supervisors have the primary responsibility for performance monitoring and improvements. Denison's philosophy is that employees learn and develop from ongoing feedback and coaching provided by their manager and supervisors. Continuous performance management and regular check-ins encourage accountability because overall performance is connected to recent actions. This provides the best opportunity for growth and learning. Early intervention to address identified performance gaps is strongly encouraged. Mentoring and additional training must be provided to employees as required to address identified performance gaps. Where performance gaps cannot effectively be addressed through these more informal mechanisms the manager or supervisor should engage the Human Resources function to assist in developing more formal performance improvement expectations for the individual employee.

While Denison uses a root cause analysis to look deeply into issues, determining the factors that impacted the behaviour such as technology, organizational and management structures, policies, training, and others, there may be times when human performance must be looked at in conjunction with deeper level improvement, and, occasionally, discipline is used to mitigate future risk of repeat behaviour. Denison has a process to verify this is done in a fair and consistent manner.

3.3 Fitness for Duty

Human performance is a key factor when assessing safety risks at a workplace. Fitness for duty may impact whether a worker is, at that point in time, considered "qualified" for the job they are doing. Fitness for duty is defined as when a worker is physically, physiologically, and psychologically capable of competently and safely performing their tasks.

Managers and supervisors are responsible to ensure that all workers are fit for duty. Managers and supervisors know how to recognize the signs of a worker who is not fit for duty and are responsible for



intervening if they have reason to believe a worker may be unfit for work. Human Resources and/or Safety personnel provide support as needed to managers and supervisors who have concerns about worker's fitness for duty.

The *Training Management Program* includes supervisor awareness training to recognize behavioural changes in all personnel, including contractors, that could pose a risk to the Operation and how to responds to those behaviours that may indicate someone is unfit for work.

The following procedures outlined in subsections 3.3.1, 3.3.2, and 3.3.3 are in place to determine whether staff are considered fit for duty while working.

3.3.1 Managing Drug and Alcohol Use

No worker may be on site in any manner while under the influence of alcohol, cannabis, cannabis derived products, illicit drugs, or prescription drugs that a physician has indicated may make them unfit for duty.

The Wheeler River Operation has the *Workplace Substance Management Policy* that all workers must sign off on. This includes:

- Expectations of fitness for duty;
- A process to follow when a worker is suspected of being unfit;
- Responsibilities of everyone on site regarding the policy;
- Supports are in place for workers struggling and how to refer or self-refer to those resources;
- Reasonable grounds testing;
- Post-incident testing;
- Follow-up and return to duty testing;
- Process for positives drug and or alcohol testing on site;
- Process for failed pre-placement testing; and
- Substance abuse evaluation processes and procedures.

All positions at the Operation are considered safety sensitive in nature due to the isolation of the facility. As such all positions fall under our fit for duty policies and responsibilities.

In the event where a manager or supervisor has reasonable cause concerns or any other situation that warrants testing, the manager or supervisor will contact Human Resources who will arrange for testing at a third-party testing facility. The company has agreements in place with third party facilities that are located in the vicinity of its operating sites to facilitate sample collection and testing.

All results of tests are provided directly to the Human Resources department and the details are maintained confidentially. Human Resources will provide direction on further actions including any accommodations, return to work plan and/or required discipline as appropriate.

Please refer to the *Fit for Duty Procedure* and the *Workplace Substance Management Policy* for more information.



3.3.2 Managing Worker Fatigue

Fatigue is known as a key contributor to incidents in a workplace. It has the potential to severely impact human performance, and as such the potential to introduce risk to the workplace. The Operation has policies to ensure worker fatigue is managed in a way that mitigates these risks.

The Fit for Duty Procedure addresses key elements to mitigate fatigue risk, including, but not limited to:

- Limits on hours of work that provide sufficient time for sleep daily;
- Restriction to consecutive shifts;
- Provides sufficient time off;
- Limits weekly average hours;
- Methods to self-report when workers believe they are too fatigued to work safely; and

Methods and training for supervisors to recognize and respond to workers portraying as unsafely fatigued.

The policy specifies the individuals accountable for preventing anyone from working in a state of extreme fatigue. The policy also, through our risk identification processes, determines which positions are high risk and may require altered work schedules to ensure safety.

Please refer to the Fit for Duty Procedure and Policies for more information.

3.3.3 Managing Medical, Physical, and Psychological Fitness

Human performance can be impacted by medical, physical, and psychological issues.

This policy assesses the risk and physical requirements associated with each job and outlines different required medical certifications for each job based on those risks.

Please refer to our Fit for Duty Procedure and Policies for more information.

3.4 Whistleblower Policy

Denison promotes a just culture where personnel are encouraged to provide honest feedback and report errors without fear of reprisal.

In addition to reporting incidents and concerns to managers and supervisors, workers can report any concerns directly to Human Resources, Legal, or Safety Department. The Company does not tolerate any retaliation, harassment, or victimization (including informal pressures) of workers who report incidents or concerns.

Personnel at the Operation may submit a complaint on a named or confidential basis as chosen by the employee following the steps outlined in the *Whistleblower Policy*. The Policy is circulated to all new employees at the time of hire and to all employees on an annual basis.



4 Check

4.1 Monitoring and Measurement

Human performance is monitored and measured against established objectives and targets (identified in Section 2.2). Denison will monitor, measure, analyze, and evaluate human performance at the Operation based on the defined process outlined in the *Management System Program*.

The human performance data related to HTO factors collected through monitoring and measurement at the Operation will be used to improve processes and achieve the desired outcome of a safe work environment.

The results of monitoring and measurement activities are communicated internally and externally and documented as part of the WRE-QUA-101 *Records Management* procedure outlined in the *Management System Program*.

4.2 Inspections and Audits

Denison will conduct internal audits of the *Human Performance Management Program* to assure compliance 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 outlined in the *Management System Program* and WRE-QUA-103 *Audits* procedure.

4.3 Management Review

The *Human Performance Management Program* will be reviewed by Denison management every three years from the date of publishing in accordance with WRE-QUA-100 *Document Management* procedure. This assures the defined Program is meeting its objectives, is effective, or needs adjustment. Management review is part of the systemic approach to monitoring and evaluating human performance and the effectiveness of all Programs comprising the Wheeler River Operation's management system. The types of items related to human performance that Denison management will review may include:

- Suitability, adequacy, and performance of training objectives and targets;
- Upcoming or new legislation related to human performance;
- Results of audits in relation to Program performance objectives and targets;
- Identified opportunities for improvement based on incident reports and other sources;
- Adequacy of resources; and
- Need 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* and WRE-QUA-109 *Self Assessment & Management Review* procedure.



4.4 Reporting

Denison will routinely report both internally and externally on the performance of the *Human Performance 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.

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 training incidents, near-misses, and deviations from the *Human Performance Management 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 Use of Experience

Experience gained from activities at the Operation or from outside sources is documented and reviewed to determine whether there is value in applying this experience to prevent a problem or improve efficiency of a process. Organizational learning considers learning from both successes and failures related to worker experiences with HTO factors at the Operation or from outside sources.

If it is determined the application of the experience is of value, action is taken to initiate the improvement. This process is outlined in the *Use of Experience and Continual Improvement* procedure as part of the *Management System Program*.

Experiences that are not considered confidential or sensitive are made available to others.

5.3 Continual Improvement

The process for continual improvement allows Denison staff to understand and learn about and seek factors that influence continual improvement of human performance and reduce risk introduced by human factors. Enhancing human performance is a critical component to the overall continual improvement process outlined in the *Management System Program* and the *Use of Experience and Continual Improvement Procedure*. 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 human performance, opportunities for continual improvement may be identified through review of incident trend analyses, audit or inspection findings, cases of performance excellence, outcomes of change management review process, and assessment against planned outcome and objectives.



6 References

6.1 Internal

Document Number	Document Name
WRE-QUA-113	Communication Procedure
WRE-QUA-100	Document Management Procedure
	Emergency Preparedness and Response Program
38	Engineering Design Control Plan
	Facility and Equipment Management Program
DMC-HS-164	Field Leadership Procedure
	Fit for Duty Procedure
	Health and Safety Management Program
	Management System Program
DMC-QUA-105-11	Preventative and Corrective Action Procedure
WRE-QUA-101	Records Management Procedure
	Risk Management Procedure
WRE-QUA-109	Self-assessment and Management Review Procedure
	Training Management Program
WRE-QUA-108	Use of Experience and Continual Improvement Procedure

6.2 External

Canadian Nuclear Safety Commission (CNSC). General Nuclear Safety and Control Regulations (SOR/2000-202)

Canadian Nuclear Safety Commission (CNSC). Nuclear Safety and Control Act (SC 1997, c.9)

Canadian Nuclear Safety Commission (CNSC). REGDOC-2.1.2, Safety Culture

Canadian Nuclear Safety Commission (CNSC). REGDOC-2.2.2, Personnel Training

Canadian Nuclear Safety Commission (CNSC). REGDOC-2.2.4, Fitness for Duty: Managing Worker Fatigue

Canadian Nuclear Safety Commission (CNSC). REGDOC-2.2.4, Fitness for Duty, Volume II: Managing Alcohol and Drug Use

Canadian Nuclear Safety Commission (CNSC). Uranium Mines and Mills Regulations (SOR2000-206)

Statutes of Saskatchewan. The Saskatchewan Employment Act