



## MEMORANDUM

## NOTE DE SERVICE

To Candace Salmon  
A Commission Registrar, CNSC

Security Classification

**UNCLASSIFIED**

Our File :

ccm# **GEN-007005**

Fully releasable ATIP :

Yes

From  
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Kim Campbell, acting Director General / dire...

Subject CNSC Staff's Review of Denison's Request for Confidentiality in Relation to CNSC Staff CMD 25-H9  
Objet Reference Documents / Examen par le personnel de la CCSN de la demande de confidentialité de Denison concernant les documents de référence du personnel de la CCSN CMD 25-H9

### PURPOSE/OBJECTIF

The purpose of this memorandum is to provide CNSC Staff's comments to the Commission regarding the matter of Denison Mines Corp. (Denison) request to protect from public disclosure the documents submitted in the request for confidentiality:

[Request for Confidentiality - Licence Application to Prepare Site and Construct for Denison Mines' Wheeler River Mine and Mill Project](#)

The CNSC Registry subsequently requested that CNSC staff provide their advice to the Commission on the Matter.

### DISCUSSION

To CNSC staff's knowledge, Denison's documents provided in the confidentiality request have not been made available elsewhere publicly, with an exception for the Groundwater Protection and Monitoring Plan (item 1 in Table 1). The Groundwater Protection and Monitoring Plan contains information that may be included in Denison's Environmental Impact Statement sections. This is further explained in Table 1 below. The other documents listed in this table have consistently been treated as confidential in CNSC staff's dealings with Denison.

CNSC staff reviewed the list of documents and related details provided by Denison. This information, along with CNSC staff comments, are included in Table 1. For all 7 documents, Denison has requested the entire contents be kept confidential with only public summaries provided.

The public summaries provided by Denison are acceptable to CNSC staff in that they accurately represent the content found in the full versions of the documents.



## CONCLUSION

CNSC staff have reviewed Denison's requests for confidentiality and have provided comments as to whether the proposed confidentiality requests are appropriate. It is CNSC staff's recommendation that Denison's request be accepted by the Commission.

**Prepared by:** Konrad Gorzkowski, Senior Project Officer (CNSC)

Attachment: Table 1

Contact/Personne-ressource: Konrad Gorzkowski, 343-573-8302  
Canadian Nuclear Safety Commission

**Table 1: Material subject to the request for confidentiality**

|    | Item Name                                  | Portion(s) covered by the request for confidentiality   | Reason for Request   | Applicant's Rationale   | CNSC Staff Comments  |
|----|--|---|--|---|--|
| 1. | Groundwater Protection and Monitoring Plan | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document | <input type="checkbox"/> The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input type="checkbox"/> Financial,<br><input checked="" type="checkbox"/> Commercial,<br><input checked="" type="checkbox"/> Scientific,<br><input checked="" type="checkbox"/> Technical,<br><input type="checkbox"/> Personal, or<br><input type="checkbox"/> Other (specify), and<br><input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure.<br>Or:<br><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) | <p>The Groundwater Protection and Monitoring Plan sets out Denison's framework for safeguarding the quality and quantity of groundwater resources throughout all phases of the Project, including preparation, construction, operation, monitoring, and decommissioning. It identifies potential risks to groundwater systems, informs ISR wellfield operations, and prescribes monitoring protocols and mitigation measures to address those risks.</p> <p>The Plan contains sensitive information regarding the location of the Project infrastructure, as well as Denison's proprietary remediation and monitoring</p> | <p>CNSC staff find that Denison's rationale to withhold the entire document may be insufficient. While CNSC staff agree that some of the information could be deemed confidential for commercial, scientific or technical reasons, there may be information already available in the following sections of Denison's Environmental Impact Statement:</p> <ul style="list-style-type: none"> <li>- Main EIS Part 1 Section 2 Project Description</li> <li>- Main EIS Part 2 Section 7 Geology and Groundwater</li> <li>- Main EIS Part 4 Section 14 Accidents and Malfunctions – very minor mention</li> <li>- Main EIS Part 4 Section 16 Summary and Conclusions – very minor mention</li> <li>- Technical Supporting Documents Section 7 Appendix 7-A Baseline Geology &amp; Hydrogeology Report</li> <li>- Technical Supporting Documents Section 7 Appendix 7-B Geology &amp; Groundwater Engagement</li> </ul> |



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|    |                             |  |  | methodologies and wellfield design and operations. Public disclosure of these details could compromise the security of the infrastructure, undermine the effectiveness of protection measures, and reveal commercially valuable strategies to competitors. In addition, the Plan is a dynamic document, subject to ongoing review and refinement as the Project evolves. Premature release could result in outdated or incomplete information being misinterpreted, potentially hindering regulatory processes, and jeopardizing the progression of the Project. | <ul style="list-style-type: none"><li>- Technical Supporting Documents Section 7 Appendix 7-C Modelling Post-Decommissioning Evaluation</li><li>- Technical Supporting Documents Section 14 Appendix 14-A Accidents and Malfunctions TSD</li><li>- Technical Supporting Documents Section 16 Appendix 16-C Summary of Monitoring and Follow-up Programs</li></ul> <p>Denison's proposed public summary presents an accurate summary of the document in question.</p> |
| 2. | Facility Description Manual | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | <input checked="" type="checkbox"/> The information involves national or nuclear security elements | The Facility Manual provides a comprehensive breakdown of the facilities located at the  | CNSC staff find that Denison's rationale to withhold the entire document is acceptable.  |

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|  |           |   | <p><input type="checkbox"/> The information pertains to Indigenous Knowledge<br/>The information is:</p> <p><input type="checkbox"/> Financial,<br/> <input checked="" type="checkbox"/> Commercial,<br/> <input checked="" type="checkbox"/> Scientific,<br/> <input checked="" type="checkbox"/> Technical,<br/> <input type="checkbox"/> Personal, or<br/> <input type="checkbox"/> Other (specify), and<br/> <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure.</p> <p>Or:</p> <p><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)</p> | <p>Project site that are associated with the mining and processing of uranium. It includes technical specifications, operational functions, and interrelationships between site facilities to support safe, efficient, and compliant operations.</p> <p>The Manual contains detailed information on each facility, including reference drawings and diagrams that constitute Denison's proprietary intellectual property. Public disclosure of these materials would enable competitors to replicate specialized designs, processes, or configurations developed through significant investment, thereby conferring an unfair commercial advantage. In addition, the Manual is a living document, subject</p> | <p>Denison's proposed public summary is an accurate summary of the document.</p> |



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|    |   |  |  | to ongoing review and updates as the Project progresses. Premature release could result in outdated or incomplete information being misinterpreted, create operational security risks, and disrupt the orderly advancement of the Project. Confidentiality is therefore critical to protecting both the Project's commercial value and its safe execution. |  |
| 3. | Wellfield Containment Design Criteria, January 2023 | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | <input checked="" type="checkbox"/> The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input type="checkbox"/> Financial,<br><input checked="" type="checkbox"/> Commercial,<br><input checked="" type="checkbox"/> Scientific,<br><input checked="" type="checkbox"/> Technical,<br><input type="checkbox"/> Personal, or<br><input type="checkbox"/> Other (specify), and<br><input type="checkbox"/> Is consistently treated as confidential and the person | The Wellfield Containment Design Criteria establishes the engineering requirements and specifications governing the development of the wellfield and associated containment systems for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be  | CNSC staff find that most of Denison's rationale to withhold the entire document is acceptable. CNSC staff do not agree that the information involves national or nuclear security elements, however this does not change the view that the other elements are acceptable to justify provision of a summary.<br><br>Denison's proposed public summary presents an accurate summary of the document.. |



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|  |           |   | <p>affected has not consented to disclosure.</p> <p>Or:</p> <p><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)</p> | <p>adhered to in the design and implementation of the wellfield.</p> <p>The Criteria contains sensitive technical information that, if disclosed publicly, could create security, safety, and operational risks. It includes the capacities, configurations, and operational tolerances of critical infrastructure, which could be exploited to cause intentional damage, unauthorized access, or disruption of water supply. Public release may also expose proprietary engineering methodologies and site-specific data developed at significant cost, giving competitors an unfair commercial advantage. For these reasons, disclosure could compromise both the security of the wellfield</p> |                     |

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|    |                                  |  |   | and Denison's business interests.  |  |
| 4. | Well Design Criteria, March 2025 | x Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | x The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input type="checkbox"/> Financial,<br>x Commercial,<br>x Scientific,<br>x Technical,<br><input type="checkbox"/> Personal, or<br><input type="checkbox"/> Other (specify), and<br><input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure.<br>Or:<br><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) | <p>The Well Design Criteria establishes the engineering requirements and specifications governing the development of the well for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be adhered to in the design and implementation of the wells, and the related ancillary equipment.</p> <p>The Criteria contains sensitive technical information that, if disclosed publicly, could create security, safety, and operational risks. It includes the capacities, configurations, and operational tolerances of critical infrastructure, which could be exploited to cause intentional damage, unauthorized</p> | <p>CNSC staff find that Denison's rationale to withhold the entire document is acceptable. CNSC staff do not agree that the information involves national or nuclear security elements, however this does not change the view that the other elements are sufficient to justify provision of a summary.</p> <p>Denison's proposed public summary presents an accurate summary of the document in question.</p> |





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|    |  |  |   | access, or disruption of water supply. Public release may also expose proprietary engineering methodologies and site-specific data developed at significant cost, giving competitors an unfair commercial advantage. For these reasons, disclosure could compromise both the security of the wells and Denison's business interests.        |   |
| 5. | Civil Earthworks Design Criteria, March 2025 | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | <input checked="" type="checkbox"/> The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input type="checkbox"/> Financial,<br><input checked="" type="checkbox"/> Commercial,<br><input type="checkbox"/> Scientific,<br><input checked="" type="checkbox"/> Technical,<br><input type="checkbox"/> Personal, or<br><input type="checkbox"/> Other (specify), and<br><input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. | The Civil Earthworks Design Criteria establishes the engineering standards, specifications, and methodologies governing the design and execution of earthworks for the Project. It defines the technical requirements for grading, drainage, fencing, and other site preparation activities, ensuring compliance with applicable regulatory | CNSC staff find that Denison's rationale to withhold the entire document is acceptable as this document includes information on nuclear security elements.<br><br>Denison's proposed public summary presents an accurate summary of the document in question. |



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|  |           |   | Or:<br><input type="checkbox"/> Disclosure of the<br>information would likely<br>endanger the life, liberty,<br>or security of a person or<br>person(s) | frameworks and industry<br>best practices.<br><br>The Criteria contains<br>detailed geotechnical<br>data, site-specific design<br>parameters, and<br>proprietary construction<br>methodologies that are<br>integral to the Project's<br>development. Public<br>disclosure of this<br>information could<br>compromise site security,<br>enable competitors to<br>replicate specialized<br>designs and techniques<br>developed through<br>significant investment, or<br>expose potential<br>vulnerabilities in the<br>Project's infrastructure.<br>Maintaining<br>confidentiality is essential<br>to safeguarding the<br>Project's commercial<br>value, operational<br>security, and the integrity<br>of its construction<br>activities. |                     |



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| 6. | Security Management Program, November 2023 | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | <input checked="" type="checkbox"/> The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input type="checkbox"/> Financial,<br><input checked="" type="checkbox"/> Commercial,<br><input type="checkbox"/> Scientific,<br><input type="checkbox"/> Technical,<br><input type="checkbox"/> Personal, or<br><input type="checkbox"/> Other (specify), and<br><input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure.<br>Or:<br><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) | <p>The Security Management Program sets out Denison's integrated approach to identifying, assessing, and mitigating security risks associated with the Project. It establishes the policies, procedures to be implemented for employees, contractors, and visitors, ensuring the protection of personnel, assets, infrastructure, and information. The Program also defines the responsibilities and protocols necessary to respond effectively to potential threats or incidents.</p> <p>The Program contains highly sensitive information regarding specific security measures, access controls, monitoring systems, and incident response procedures. Public disclosure of these</p> | <p>CNSC staff find that Denison's rationale to withhold the entire document is acceptable as it contains nuclear security information.</p> <p>Denison's proposed public summary presents an accurate summary of the document in question.</p> |



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|    |   |  |  | details could compromise the effectiveness of the security measures, increase the risk of unauthorized access or malicious activity, and endanger the safety of individuals and the integrity of the Project site. Maintaining strict confidentiality is critical to preventing the exploitation of security protocols, safeguarding critical infrastructure, and ensuring that security measures remain effective in mitigating potential threats throughout the life of the Project. |  |
| 7. | Wheeler River Preliminary Decommissioning Cost Estimate and Financial Guarantee Memo, June 2025 | <input checked="" type="checkbox"/> Entire content<br><input type="checkbox"/> Redacted content as clearly identified in the document. | <input type="checkbox"/> The information involves national or nuclear security elements<br><input type="checkbox"/> The information pertains to Indigenous Knowledge<br>The information is:<br><input checked="" type="checkbox"/> Financial,<br><input checked="" type="checkbox"/> Commercial,<br><input type="checkbox"/> Scientific,<br><input checked="" type="checkbox"/> Technical, | The Memorandum provides an overview of the preliminary decommissioning plan, as well as the cost estimate and financial guarantee mechanism for the Project, based on the proposed assets and activities.  | CNSC staff find that Denison's rationale to withhold the entire document is acceptable as it contains proprietary and commercially sensitive information.<br><br>Denison's proposed public summary presents an accurate summary of the document in question. |



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|  |           |   | <p><input type="checkbox"/> Personal, or</p> <p><input type="checkbox"/> Other (specify), and</p> <p><input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure.</p> <p>Or:</p> <p><input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)</p> | <p>The Memorandum contains sensitive information, including asset-specific details, cost assumptions, and financial security arrangements, the disclosure of which could provide competitors with strategic insights or undermine Denison's negotiating position. It also includes correspondence with the Saskatchewan Minister of Environment, which is not intended for public release. Public disclosure could compromise commercial confidentiality and create unnecessary risks to the Project's financial and operational planning.</p> |                     |