



CMD 26-H105.6

Date: 2026-08-31

**Written Submission from
Denison Mines Corporation**

**Mémoire de
Denison Mines Corporation**

In the matter of

À l'égard d'

Orano Canada Inc.

Orano Canada Inc.

Application to renew the McClean Lake
Operating Licence for 2-year term

Demande pour le renouvellement du permis
d'exploitation de McClean Lake pour une
période de deux ans

**Hearing in writing based on written
submissions**

**Audience par écrit fondée sur des
mémoires**

September 2026

Septembre 2026



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August 31, 2026

Commission Registry
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa ON K1P 5S9

Denison Mines Corp. Intervention for Orano Canada Inc.'s Licence Renewal for the McClean Lake Operation (CMD 26-H105)

Dear Commission Registry,

Pursuant to rule 19 of the *Canadian Nuclear Safety Commission Rules of Procedure* (the Rules), Denison Mines Corp. (Denison) is requesting to intervene in favor of the Commission's decision to renew Orano Canada Inc.'s (Orano) uranium mine and mill licence for the McClean Lake Operation.

Please see the appended written submission from Denison to be presented to the Commission in favour of the renewal decision.

For further inquiries regarding this submission, please contact the undersigned.

Regards,

A handwritten signature in blue ink, appearing to read 'Janna Switzer', with a stylized flourish at the end.

Janna Switzer
Vice President Environment, Sustainability, & Regulatory
Denison Mines Corp.

cc: Carolanne Inglis-McQuay (Denison)

Appendix A:

Orano Canada Inc.'s Licence Renewal for the McClean Lake Operation (CMD 26-H105)

August 31, 2026

Overview

Please accept this correspondence as Denison Mine Corp.'s ("Denison") written intervention for Orano Canada Inc.'s ("Orano") request for a 2-year renewal of its Operating Licence for the McClean Lake Operation.

Denison, through its wholly owned subsidiary Denison Mines Inc., owns 22.5% of the McClean Lake Joint Venture ("MLJV"). Orano owns 77.5% of MLJV and acts as the operator.

Orano is requesting the renewal for the McClean Lake Operation without changes to the current licensing basis and authorized activities, licence terms and conditions, or the Licence Conditions Handbook ("LCH").

Denison fully supports the application and endorses Orano as qualified to continue operating the facility safely and in compliance with the Nuclear Safety and Control Act, CNSC requirements, and other applicable legislation.

Demonstrated Reliable Performance

Orano has operated the McClean Lake Operation in a manner that has continued to demonstrate safe and reliable operating performance, including:

- consistent, reliable processing of Cigar Lake ore slurry,
- the successful commencement of mining operations at the McClean North site using the Surface Access Borehole Resource Extraction ("SABRE") mining method,
- achievement of annual mill production of approximately 18 million pounds U_3O_8 , and
- continued operation within the existing licensed framework.

This performance illustrates that the McClean Lake Operation continues to be a leader in responsible uranium production in Saskatchewan.

Maintaining this level of performance requires disciplined management of radiation protection, conventional health and safety, environmental controls, maintenance, training, and emergency preparedness. Orano's continued operation within the approved licensing basis demonstrates that the facility has been managed in a manner consistent with CNSC expectations and the requirements applicable to uranium mines and mills.

In Denison's view, the requested two-year licence renewal is appropriately supported by Orano's operating history and that the McClean Lake Operation will continue its safe and reliable operations under the existing regulatory framework.

Commitment to Indigenous and Community Engagement

Orano has shown continuous attention to transparency, community involvement, and community engagement efforts. This is best demonstrated by the organization's utilization of the Athabasca Joint Engagement Subcommittee ("AJES"), the Joint Implementation Engagement Subcommittee ("JIES"), and the Joint Implementation Engagement and Environmental Subcommittee ("JIEES"), formed through its Collaboration Agreements with Ya'thi Néné, the Northern Village of Pinehouse and Kineepik Métis Local #9, and English River First Nation, respectively.

Strong Environmental Monitoring and Stewardship

Orano routinely demonstrates its strong commitment to environmental protection through the continued execution of a comprehensive Environmental Monitoring Program ("EMP"), as described in Section 3.9.1 of Orano's Commission Member Document.

The EMP integrates effluent monitoring, environmental monitoring, as well as groundwater protection and monitoring, and is designed to verify environmental performance, confirm the effectiveness of environmental controls, support environmental risk assessments, and evaluate the effectiveness of adaptive management measures. The program is periodically reviewed to ensure alignment with evolving regulatory requirements.

This monitoring framework is an important component of responsible operations, providing ongoing verification that environmental protection measures remain effective and that potential risks to human health and the environment are continually managed appropriately. Based on the extensive environmental monitoring data collected throughout the history of the McClean Lake Operation and the demonstrated effectiveness of Orano's Environmental Management System, we are confident that the McClean Lake Operation, under the renewed licence, will maintain its strong environmental performance record and continue to protect the environment and surrounding communities.

Conclusion

Denison fully supports Orano's application for the McClean Lake Operation Licence Renewal.

We believe Orano has demonstrated that it remains a qualified operator of the McClean Lake Operation through its strong operational performance, robust environmental monitoring and management programs, and ongoing engagement efforts with Indigenous communities.

Denison considers the application well supported, and believes that approval of the licence renewal will allow for the continued safe operation of the McClean Lake Operation.