



CMD 26-H3.50

Date: 2026-10-02

**Written Submission from
Canadian Nuclear Association**

**Mémoire de l'
Association nucléaire canadienne**

In the matter of

À l'égard de

Cameco Corporation

Application to renew the Class IB nuclear fuel facility operating licence for the Port Hope Conversion Facility for a period of 20 years

Cameco Corporation

Demande visant à renouveler, pour une période de 20 ans, le permis d'exploitation d'une installation de combustible nucléaire de catégorie IB pour l'installation de conversion de Port Hope

Commission Public Hearing

Audience publique de la Commission

November 2026

Novembre 2026

CNA in support of the Port Hope Conversion Facility Licence Renewal

Introduction

The Canadian Nuclear Association supports Cameco Corporation's application to renew the operating licence for the Port Hope Conversion Facility (PHCF) for a 20-year term, from February 28, 2027 to February 28, 2047. We respectfully recommend that the Commission grant the renewal as requested.

The Canadian Nuclear Association is the national voice of Canada's nuclear industry and has more than 100 members, representing over 89,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. Cameco is a member of the CNA. We submit this intervention on behalf of the broader industry, whose operations depend on a secure, domestic supply of conversion services.

Domestic Value

PHCF is Canada's only uranium conversion facility. More than half of Ontario's electricity comes from nuclear reactors fuelled through this supply chain. With refurbishments underway, new large reactors and small modular reactors in development, and allied countries seeking to reduce reliance on Russian conversion capacity, PHCF's role is critical.

The facility also employs over 480 people directly. Canada's nuclear industry supported 89,000 direct and indirect jobs in 2024, and PHCF is a foundational part of that domestic supply chain.

Safety and Regulatory Performance

PHCF has operated safely throughout the current licence period, with performance achieving the highest rating of Satisfactory across the CNSC's 14 Safety and Control Areas for the majority of that period.

- Public dose: In 2025, dose to the public from the facility's air, water and direct gamma emissions was 0.07 mSv of the 1 mSv annual public limit. That is less than a typical chest x-ray (0.1 mSv).
- Worker protection: Worker exposures have remained well below regulatory dose limits, supported by a radiation protection program built on the ALARA principle.
- Training: Staff completed 21,890 training hours in 2025.
- Emergency preparedness: An Emergency Response Team of about 65 employees keeps at least four members and an incident commander on site whenever the facility operates. A memorandum of understanding with the Municipality of Port Hope provides joint training and mutual aid.

This record reflects mature management systems and a strong safety culture, meeting the conditions of the Commission when considering a longer licence term.

Environmental Performance

PHCF has continued to reduce its environmental footprint during the current licence period, and its 2025 Environmental Risk Assessment found no undue effects on people or the environment.

- Closed-loop cooling: New systems commissioned in 2022–2023 replaced lake-water cooling, eliminating the facility's surface water intake and any outlet to Port Hope harbour.
- Water releases: Uranium released to the municipal sanitary sewer in 2025 only totalled 0.60 kg.
- Air monitoring: Uranium in dustfall at all seven stations averaged 0.2 mg U/m²/30 days or less from 2021 to 2025, against an internal screening level of 10. Fluoride measured by lime candles averaged 3–4 µg F/100 cm²/30 days, a tenth or less of the provincial criteria of 40 (summer) and 80 (winter).
- Legacy cleanup: Through the Vision in Motion project, PHCF has reduced its site footprint by more than 20% and cut its inventory of drummed waste by 75%, while opening more of the waterfront to the public.
- Management system: Environmental management is certified to ISO 14001, with annual independent audits.

Community and Indigenous Engagement

PHCF operates with strong local support and a commitment to transparency. Cameco's Public Disclosure Protocol requires submission of unusual operational events and reportable environmental incidents online within 24 hours, and to publish compliance monitoring reports quarterly. These commitments continue throughout the proposed term. In a July 2024 third-party survey of 303 Port Hope residents, 91% supported Cameco's continued operations and 84% agreed its environmental monitoring protects community health.

The facility sits in the traditional territory of the Michi Saagiig and Chippewa Nations of the Williams Treaties First Nations. The CNA encourages the Commission to give full weight to the views of these Nations, and supports Cameco's continued commitment to meaningful engagement with them over the life of the licence.

In Support of a 20-Year Term

The Canadian Nuclear Association recommends that the Commission renew the operating licence for the Port Hope Conversion Facility for a term of 20 years. The facility's safety record, low environmental impact, strict ongoing oversight, and domestic significance together justify the requested term.

A 20-year licence changes the renewal cycle and therefore administrative inefficiency, not the level of oversight. The CNA supports longer terms for facilities with a demonstrated record of safe, compliant operation, and PHCF meets that standard.

Under the proposed term, the safeguards that protect the public remain in place. CNSC staff continue inspections, compliance verification and regulatory performance reporting. Safety analysis, fire protection, environmental risk, public dose and preliminary decommissioning studies are reviewed every five years.

The application proposes no changes to authorized activities, programs, release limits, action levels or reporting requirements. Longer terms also give the licensee planning certainty for long-horizon investments such as Vision in Motion, and let CNSC staff focus effort on risk-significant compliance work rather than administrative renewal cycles.

We thank the Commission for the opportunity to participate in this intervention.

Thank you,



George Christidis

President and CEO, Canadian Nuclear Association