
From: Kim Hanson <Kim_Hanson@cameco.com>
Sent: February 10, 2020 3:15 PM
To: Consultation (CNSC/CCSN)
Cc: Fundarek, Peter (CNSC/CCSN); Ducros, Caroline (CNSC/CCSN)
Subject: Cameco's Comments on REGDOC - 2.10.2, Fire Protection
Attachments: Cameco Corporation's Comments on REGDOC - 2.10.2, Fire Protection.pdf

Sent on behalf of R. Liam Mooney, Vice-President, Safety, Health, Environment, Quality & Regulatory Relations, Cameco Corporation

Dear Mr. Torrie:

Cameco Corporation (Cameco) has prepared the attached comments on *REGDOC – 2.10.2, Fire Protection*.

If you have any questions with respect to the above, then please contact Liam Mooney at (personal information redacted or [personal information redacted](#)).

Thank you.

Kim Hanson

Executive Assistant to Liam Mooney
Vice President, Safety, Health, Environment & Quality and
Regulatory Relations

Cameco Corporation
Operations Centre
1131 Ave W South
Saskatoon, Saskatchewan S7M 4E8
Office: personal information redacted
Email: [personal information redacted](#)

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February 10, 2020

Mr. Brian Torrie
Director General
Canadian Nuclear Safety Commission
280 Slater Street
PO Box 1045, Station B
Ottawa, ON K1P 5S9

CAMECO CORPORATION
Corporate Office
2121 – 11th Street West
Saskatoon, Saskatchewan
Canada S7M 1J3

Tel 306.956.6200
Fax 306.956.6201
www.cameco.com

VIA EMAIL

Cnsc.consultation.ccsn@canada.ca

Dear Mr. Torrie:

Cameco Corporation's Comments on REGDOC – 2.10.2, Fire Protection

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-2.10.2, *Fire Protection* (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

Cameco was deeply disappointed with the content of this REGDOC in light of the previous representations made by CNSC that a regulatory document would not be required if industry funded and supported a CSA fire protection standard. As a result, Cameco invested significant resources to support the development of CSA N393, *Fire protection for facilities that process, handle, or store nuclear substances* (N393), which, in our view, creates a complete regime for fire protection in conjunction with the National Fire Code of Canada, the National Building Code, and the National Fire Protection Associations codes. We do not believe the REGDOC fulfills any unmet need or addresses any regulatory gap and instead creates uncertainty and confusion in what we see as an integrated fire protection regime that is currently functioning well.

Further, the REGDOC is inconsistent with N393, including adding requirements that are not in N393. The following are the inconsistencies and/or new requirements that are of major concern:

1. Throughout, the REGDOC paraphrases N393 language and, in some cases, appears to interpret the intent of N393. In either case, this introduces confusion and compliance uncertainty. The REGDOC should either refer to applicable sections of N393 or adopt the language in N393 verbatim.
2. The REGDOC lists requirements from N393, without including the exemptions and exceptions applicable to those requirements. Cameco recommends that section 1.2, Scope add "It does not override any exemptions or exceptions in N293 or N393, for which the CNSC is the authority having jurisdiction" between the first and second sentences.

3. Sections 6.2.1 and 6.6.1 both require licensees to comply with current versions or editions of codes and standards when licensees are required to comply with the versions or editions identified in their Licence Conditions Handbooks. Both of these sections should be revised.
4. Cameco is particularly concerned that the REGDOC introduces new requirements for uranium mines and mills that are contrary to a risk-based approach. Appendix I: Fire Response, section I-4, states that interior firefighting capability should be as defined in NFPA-600. N393, however, states that a facility “should be capable of identifying how their program aligns with the requirements of NFPA-600” (11.1.2) and that NFPA-600 and NFPA-1081 (11.5.8.2 and 11.5.5.2) are guidance documents.

Uranium mines and mill fire response does not include the capabilities defined in NFPA-600 and such capabilities would be disproportionate to the fire risk associated with the substances located at the mines and mills, the value of structures, and the consequences associated with fire protection at these remote locations. Meeting NFPA-600 capabilities would provide no safety or environmental benefit at mines and mills and the fact that the section uses ‘should’ statements does not offer any comfort because project officers routinely treat ‘should’ statements as de facto requirements.

Cameco supports the general industry position that all the appendices in the REGDOC should be deleted. In the alternative, Cameco recommends that the first paragraph in Appendix I.4 to be revised to “...a fire response capability should include interior firefighting capability as defined in NFPA-600 or based on NFPA-600, as appropriate.”

5. Section 5, new requirements: The figure and the accompanying text suggests that all five levels of defence must be fulfilled to meet defence-in-depth. The fourth paragraph should be revised to “...DID is achieved through a combination of some, or all, levels of design...quality assurance and emergency arrangements to meet the FPA goals as identified in CSA 393” and the last sentence in the fifth paragraph that states that fulfillment of the five elements achieves an appropriate DID should be deleted.
6. Section 6, new requirement: The second bullet includes fire safety assessments as part of a fire protection program (FPP) when current FPPs do not include such assessments. This is also inconsistent with N393. Cameco recommends that the second bullet be deleted.
7. Section 6.2.1, new requirement: The second paragraph of the code compliance review (CCR) section states that when the design of a fire protection feature has been reviewed by a third-party, the third-party review (TPR) report should be referenced in the CCR. This paragraph should be deleted because the CCR confirms compliance and not design; whereas, the TPR reports are verified under QA programs. Further, to require licensees to reference all reports would create an administrative burden to licensees without any corresponding benefit. Similarly, the requirement imposed by “CCR must outline how the intent of the requirements is met” for alternative solutions should be replaced with “CCR must reference the accepted alternate solution, where applicable.”
8. Section 6.8: The last bullet requires maintaining a “level of safety equivalent” as a compensatory measure. When a system is impaired, Cameco would implement a control

based on risk, which would be comparable to the impairment system. In many cases, an “equivalent” measure would not be achievable and would not be risk-based. The use of “equivalent” introduces uncertainty and should be replaced by “comparable”.

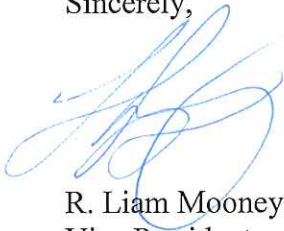
9. Sections 6.9 and 6.10, inconsistent with N393: The second and third sentences introduce uncertainty regarding employee status and a systematic approach to training. Both sentences are unnecessary, introduce uncertainty and should be deleted.
10. Section 6.13.1: This section increases the scope of a fire protection audit as defined in N393 and creates confusion. The bulleted list should be deleted.
11. Section 6.16, new requirement: N393 does not require ‘familiarization tours’ and the reference to such tours should be deleted.

Cameco agrees with other industry stakeholders that the appendices are a “hodge podge” of best practices, guidance and requirements paraphrased from N393 and add little to no value and, where they appear to introduce new requirements inconsistent with N393, would lead to confusion and compliance uncertainty. Cameco recommends that these appendices be deleted in their entirety.

Cameco believes that a workshop on this REGDOC would be of value and would welcome the opportunity to participate in such an undertaking.

If you have any questions with respect to the above, then please contact me at (306) 956-6685 or liam_mooney@cameco.com.

Sincerely,



R. Liam Mooney
Vice President
Safety, Health, Environment, Quality & Regulatory Relations, Cameco Corporation

c: Peter Fundarek, Director of Uranium Mines and Mills Division, CNSC
Caroline Ducros, Director of Nuclear Processing Facilities Division, CNSC