



October 30, 2018

VIA EMAIL

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Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC-2.1.1, Management System

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-2.1.1, Management System (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

A. REGDOC creates uncertainty

The following comments focus on sections of the REGDOC that have the potential to create confusion or uncertainty for licensees and the public and may result in inconsistent interpretations by CNSC project officers and licensees.

1. Intent is unclear

Cameco's major concern with the REGDOC is that it is very unclear, when the document is reviewed as a whole, whether it is intended to provide information to licensees or whether it is also intended to create new requirements. In addition to numerous assurances we have received from CNSC staff in this regard, we also believe the intent was for the document to be information only for the following reasons:

- the **Preface** expressly excludes the application of a graded approach statement included in REGDOCs in which requirements can only be applied using a risk-based approach; and
- no discussion paper was issued as is required under the CNSC regulatory framework when regulatory oversight is proposed in a new area or when authority will be exercised in a different manner than past practice, either of which would include some or all of the 'emerging issues' described in the REGDOC.

For example, the **Counterfeit, fraudulent and suspect items (CFSI)** section could be misinterpreted to add requirements and not be informational only. The consequences of a counterfeit part in a process in a uranium mine are wholly unlike the consequences at a nuclear power plant and the CFSI section could be interpreted to suggest supply chain management processes at all facilities should be similar instead of using a graded approach.

This uncertainty can be eliminated by replacing 'direction' with 'information' or 'clarification' or 'guidance' where the information relates to issues outside the scope of, or additional to, CSA N286-12 (N286-12) and its requirements.

We recommend that “and emerging” be deleted from the second paragraph of the **Preface** because it is outside the scope of explaining to licensees what they must achieve to meet the requirements set out in the *Nuclear Safety Control Act* and its regulations. We further recommend that the third bullet in the **Purpose** section either be deleted or replaced with “Supplemental information related to management systems”. As drafted, this bullet may create an expectation that the REGDOC is a comprehensive review of all topics in which there have been recent developments in management system standards as well as a repository for emergent issues when it is not either of these.

2. Use of imprecise language

Cameco recommends that the REGDOC be revised to adopt the precise style used in section 3.5 throughout the REGDOC. That is, the REGDOC should refer to the applicable sections in N286-12 or other relevant standards without paraphrasing or summarizing the source document as follows:

- a) **CSA N286-12 structure and principles** section: In our view, substituting ‘design’ within the second paragraph for ‘define’ substantively changes the meaning intended in N286-12 and this should be corrected. At the very least, this substitution implies a different meaning and, in the absence of an explanation, this invites different interpretations by regulatory officers and licensees and introduces uncertainty.
- b) **Leadership** section: The final sentence of the second paragraph should be revised to reproduce section 4.13.b of N286-12; and the third paragraph should be revised by deleting all text after “...have further elaborated on leadership”, including deleting the bullets.

3. Developments in management system standards

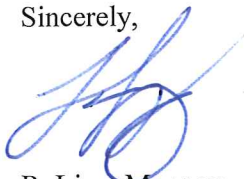
Further to comment #1, Cameco believes that addressing new issues in revisions to the CSA standard is a better practice than providing commentary in a REGDOC. The CSA process is collaborative and provides the opportunity for a fulsome technical review by industry stakeholders, including the CNSC of these issues and how they might be addressed in a standard. Cameco recommends that REGDOC-2.1.1 remains informative in nature and that - as management system elements are clarified within the CSA standards revision process - the REGDOC is aligned and updated accordingly.

B. Radiation Safety Oversight

Cameco does not believe that a management system document should include licensees that are not required to have a management system. For this reason, we recommend that this section be removed from this REGDOC. If this section is retained, then the ‘should’ statements should be replaced with ‘may’ statements to be consistent with the Scope section.

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

Sincerely,



R. Liam Mooney
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Cameco Corporation