



September 28, 2017

VIA EMAIL

Mr. Brian Torrie
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Regulatory Policy Directorate
Canadian Nuclear Safety Commission
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Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC 3.2.1, *Public Information and Disclosure*

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC 3.2.1, *Public Information and Disclosure* (the REGDOC).

2.2.4 Public information strategy and products

Cameco does not agree that it is appropriate or valuable to post an environmental risk assessment (ERA) on a licensee's website and strongly objects to the imposition of such a requirement in a REGDOC.

An ERA may include protected information, export controlled nuclear technology, or information that is protected from disclosure pursuant to the *Access to Information Act*. To post an ERA in these circumstances would require the document to be redacted and the administrative burden to prepare such documents greatly exceeds any benefit to the public.

Further, ERAs are typically very technical (i.e. contain emission factors, model descriptions etc.) and lengthy (Cameco's ERAs may exceed 600 pages) which makes such documents of little value to the public without further explanation and context. This is inconsistent with "ensuring information is presented in a manner that is understandable to the public, preferably using plain, non-technical language" as recommended in section 2.2.4.

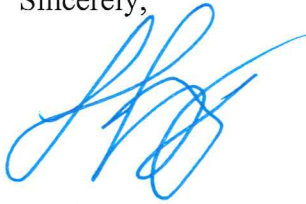
In our view, the posting of ERA summaries consistent with the proposed requirement for probabilistic safety assessments would permit licensees to condense the technical information

using plain, non-technical language and provide the context necessary for the public to understand the information in the ERA.

We also note that some of the terms defined in the glossary in the REGDOC are inconsistent with the definitions in REGDOC-3.6, Glossary of CNSC Terminology. We recommend that the glossary be removed and the REGDOC should refer to REGDOC-3.6.

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
Vice President
Safety, Health, Environment, Quality & Regulatory Relations
Cameco Corporation

c: Cameco - Regulatory Records
CNSC - Uranium Mines and Mills Division Records