



VIA EMAIL

September 12, 2016

Canadian Nuclear Safety Commission
PO Box 1046, Station B
280 Slater Street
Ottawa, ON K1P 5S9

CNSC.consultation.ccsn@canada.ca:

Re: Comments on Discussion Paper DIS-16-03, Radioactive Waste Management and Decommissioning

AREVA appreciates the opportunity to comment on discussion papers provided by the CNSC as they work to continually improve their regulatory framework. Clarification of aspects of radioactive waste management and decommissioning will benefit licensees and we look forward to providing additional feedback as the CNSC progresses on the topic.

AREVA has had the opportunity to review the comments being submitted by Cameco Corporation and believes Mr. Mooney's letter has thoroughly addressed the issues relevant to uranium mining, milling and subsequent decommissioning of associated facilities. We concur with Cameco's comments and would like to emphasize the following few points:

- As a holder of both an operating licence for our McClean Lake uranium mine and mill, and a decommissioning licence for our Cluff Lake site, we believe the current legislation adequately provides a clear process for licensing uranium mines and mills and no regulatory change is necessary.
- There is confusion created by a classification system for radioactive wastes which mixes a risk-based approach with a source-based approach. The risk-based scheme proposed by Cameco for NORM wastes regulated by the CNSC as part of the fuel cycle, such as mine rock and mill tailings, would provide the necessary coherence to the classification system.
- The CNSC should not incorporate the 3Rs as a requirement in regulation. Companies are intrinsically motivated to apply the concepts of reduce, reuse, and recycle where it is practical and makes economic sense and licensees have already integrated these concepts into their practices. There is not enough information in the discussion paper to understand how the 3Rs

may be applied in regulation to determine the impact on industry, especially if it is beyond what is already implemented as economic and practical.

Should you have any questions, please contact me at (306) 343-4058 or dale.huffman@areva.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dale Huffman', is written over a light blue circular watermark.

Dale Huffman,
VP Health, Safety, Environment, and Regulatory Relations