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VIA EMAIL

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Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC-2.11.2, *Decommissioning*

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft **REGDOC-2.11.2, *Decommissioning*** (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

Cameco notes at the outset that this REGDOC continues the negative trends in REGDOC drafting we have commented on before with respect to the addition of requirements to legislated requirements when REGDOCs should be used to provide guidance on how licensees may meet the legislated requirements. In this case, the guidance from G-219, *Decommissioning Planning for Licensed Activities* and CSA N294-09, *Decommissioning of facilities containing Nuclear Substances* (CSA N294) has been converted into new requirements. This has a profound impact on resources that a licensee may be required to use without any improvement in safety or environmental benefits while not following the checks and balances that new regulations require.

We also note that this REGDOC refers to draft REGDOCs (REGDOC-2.11.1, Vol. I and Vol. III). As stated in previous comments, Cameco believes that only published REGDOCs should be referenced to permit a thorough review of a draft REGDOC and its implications.

With respect to this REGDOC specifically, Cameco's main concern is that it is inconsistent with CSA N294. For example:

- Section 5.1.1: Content of the PDP
 - The bullet list does not align with CSA N294, Annex A. Of particular concern is the REGDOC's use of 'shall include', whereas CSA N294 uses the more appropriate 'may include' when bullets do not apply to all facilities.
- Section 6.2.1: Content of the DDP
 - The bullet list does not align CSA N294, Section 7.8.2.

- This section does not align with the statement in CSA N294 that ‘the detail and complexity of a [detailed] decommissioning plan shall be commensurate with the facility being decommissioned. . .’

Cameco recommends that the CNSC ensure that the issued REGDOC aligns with CSA N294.

Further, the language used in the REGDOC is inconsistent with some of the definitions used in other REGDOCs and related CSA standards. In this regard, definitions of the following should be developed and/or included in REGDOC-3.6:

- “decommissioning” should be defined in REGDOC-3.6 and be consistent with CSA N294 and Part 6 of the International Atomic Energy Agency’s *General Safety Requirements*.
- “remediation” (Section 1.2)
- “legacy sites” (Sections 1.2 and 4)
- “defence in depth” (Section 6.3)

Purpose (Section 1.1)

This section does not recognize that decommissioning is an approved activity under current uranium mine and mills licences and, for other nuclear facilities, decommissioning activities can occur under an operational licence. The second paragraph should be revised to specify that the initiation of decommissioning is triggered by activities set out in a detailed decommissioning plan (DDP) that may be submitted during operations. Further, the undefined term “deferred decommissioning” should be deleted from the last sentence.

The third paragraph should be amended to read, “...there are no areas with residual contamination above levels that would require a licence” or, in the alternative, “end-state criteria” should be defined in REGDOC-3.6.

Background (Section 2)

As stated above, Cameco’s view is that decommissioning is part of the lifecycle of a facility and the operational phase of a facility is not a phase of decommissioning as depicted in Figure 1.

The bulleted list should be revised as follows:

- First bullet: “...nuclear facility is located, designed and constructed in a manner...”
- Seventh bullet: “...wastes that will be managed and recorded during decommission” because it is waste that is generated throughout the lifecycle of the facility that will require decommissioning and not wastes generated through decommissioning.
- Add “post decommissioning” as a bullet and revise the sentence before Figure 1 to read “...in sections 5 to 9...”

The acronyms PDP and DDP used in Figure 1 are not defined, which may cause confusion for some stakeholders.

Optimization and Graded Approach in Decommissioning (Section 3)

The first sentence should be revised to "...shall ensure the protection and safety of workers, the public and the environment during decommissioning."

Decommissioning Strategy (Section 4)

Cameco recommends the following:

- Subparagraph (b) in the second paragraph should state that "storage with surveillance" can also be referred to as "care and maintenance" for uranium mines and mills.
- The third paragraph should state expressly that it applies to Class I facilities by, for example, revising the paragraph to read "...for *in situ* decommissioning results in a waste disposal site at a Class I facility, the licensee shall..."
- The fourth paragraph should be revised as follows:
 - The first sentence should state that *in situ* decommissioning is an acceptable practice for uranium mines and mills and disposal facilities.
 - The third sentence should replace "foreseeable future" with "period defined in the safety case."
- Bullet 15 in the first list on page 5 should be deleted because "political, social and economic" considerations are too vague and broad to be meaningful.

Detailed Decommissioning Plan (Section 6.2)

The last paragraph in this section is confusing and should be revised to recognize situations where some "planning envelopes" at a facility may not be progressing into a DDP and will remain in a PDP stage.

Waste Management Plan (Section 6.4)

This section should recognize that the waste management plan is at a higher level during the early stages of a facility lifecycle (PDP) and becomes progressively more detailed in the DDP. Cameco recommends adding the following to the end of the first paragraph: "In the initial phases of decommissioning planning, the waste management plan will be preliminary in nature, becoming more detailed as the facility progresses into decommissioning activities."

Pre-operational Surveys (Section 10.1)

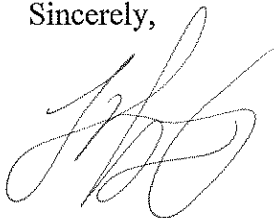
Cameco does not believe that the term "hazardous chemicals" used in the first paragraph is appropriate and instead recommends that it should be replaced with "potential contaminants of concern" or "other parameters of interest".

In the second last phrase “retained and assessed” should be replaced with “collected and assessed” because such materials will not be retained for future reference.

Given the extent and substance of these comments, Cameco believes that a revised draft of this REGDOC should be published for review and comment before the CNSC proceeds to finalize it

If you have any questions with respect to the above, then please contact liam_mooney@cameco.com.

Sincerely,



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c. Ms. Haidy Tadros, Director General, Directorate of Nuclear Cycle and Facilities Regulation