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VIA EMAIL

Mr. Mark Dallaire
Director General
Regulation Policy Directorate
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, ON K1P 5S9

Dear Mr. Dallaire:

Cameco Corporation (Cameco) has reviewed Regulatory Document REGDOC 2.10.1: *Emergency Management and Fire Protection: Nuclear Emergency Preparedness and Response* and has prepared the below comments and recommendations for your consideration.

Generally, Cameco would like to start by emphasizing our support for the comments provided by the Canadian Nuclear Association (CNA) on this Regulatory Document in their letter of October 11, 2013. To ensure that the emergency requirements for uranium mines and mills are transparent and certain, Cameco recommends that these facilities should not be included in the current document. Rather, a separate document specific to these facilities should be developed.

If this approach is not utilized, then we have specific concerns about the proposed document. More specifically, the Regulatory Document provides as follows in the Introduction (page 1):

This regulatory document applies to all Class I nuclear facilities and uranium mines and mills (UMMs). Some requirements in this document are specifically designated as applying only to nuclear power plants and research reactors whose

thermal output capacity is greater than 10 MW. Nevertheless, all requirements should be considered and applied when appropriate.

Rather than leave it that the licensee should apply everything in this document unless demonstrated that it is not appropriate, we believe that this document should be structured so as to detail the specific requirements for different types of Class 1 facilities. For example, if there are specific requirements for uranium mines and mills, then these should be detailed. Our recommendation is to therefore remove the last sentence of the above paragraph, "*Nevertheless, all requirements should be considered and applied when appropriate*".

Further, section 2.3.2's subsection 5(c) provides as follows:

- b. *offsite authorities are notified within 15 minutes of categorizing the event*
- c. *the CNSC is notified within 15 minutes of activation of the ERO and again within 15 minutes of initial notification to offsite authorities*

In the uranium mining and milling context, we believe that 15 minutes is an unreasonable requirement to report to CNSC and offsite authorities. Site response happens quickly, and protection of human life, environment and property are the primary priorities. Once these priorities are being addressed, then there will be time to notify the CNSC and offsite authorities. We would therefore recommend that "as soon as practicable" following the categorizing of the event be the reporting timeframe to report to CNSC and offsite authorities.

In addition, Section 2.3.5's subsection 2 provides as follows:

...have sufficient personal protective equipment (PPE) and provisions to respond to emergencies and protect the emergency responders for the first 72 hours without offsite assistance.

Pursuant to the *Saskatchewan Mines Regulations*, Cameco's mining operations are required to have three -5 person teams (for a total of 15 individuals) on site to respond to underground emergencies. Mine rescue teams have a capacity to function in an emergency situation to a maximum of four hours per team providing the teams approximately 12 hours of coverage. Same team rotation is expected, but cannot be sustained for 72 hours without mutual aid support from the other northern mining operations. A lengthy underground emergency is unusual and can be normally resolved with site teams and mutual aid support, but 72 hours without offsite assistance is not reasonable for these operations. Cameco therefore recommends that uranium mines and mills be exempted from this requirement.

Subsection 3 of section 2.3.8 requires that operators "submit the actual recovery plan to the CNSC prior to commencing recovery efforts". Submission of an actual recovery plan to the CNSC prior to commencing the recovery efforts may not always be possible. If approval is required, then this could unnecessarily prolong a simple, straight forward

response, increase the risk of contamination being spread, and delay production start-up. This requirement should not apply to uranium mines and mills. Alternatively, only under extreme circumstances, where recovery is significant and long term, should a plan be required.

Finally, section 2.3.9's subsection 3 requires that operators "notify the CNSC of changes to ER plans and procedures, and submit the results of the validation to the CNSC, at least 30 days before implementing changes". Cameco conducts review and revises to our site Emergency Response Plans and procedures annually. We do not believe it is necessary to provide notifications on minor administrative updates. Accordingly, we would recommend that a threshold be established – e.g. "for major changes".

If you have any questions or require further information, please feel free to contact Mr. Wayne Summach, Program Manager, Emergency Preparedness and Contractor Management at 306-956-6671.

Sincerely,



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

c: M.A. Charette, W. Summach – Cameco
J. LeClair – CNSC