



February 15, 2019

VIA EMAIL

Mr. Brian Torrie
Director General
Regulatory Policy Directorate
Canadian Nuclear Safety Commission
280 Slater Street
PO Box 1046, Station B
Ottawa, ON K1P 5S9
cnscconsultation.ccsn@canada.ca

CAMECO CORPORATION
Corporate Office
2121 – 11th Street West
Saskatoon, Saskatchewan
Canada S7M 1J3

Tel 306.956.6200
Fax 306.956.6201
www.cameco.com

Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC-3.1.3, Reporting Requirements for Waste Nuclear Substance Licensees, Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-3.1.3, Reporting Requirements for Waste Nuclear Substance Licensees, Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

We do not have additional comments to our November 2, 2018 submissions on the previous draft of REGDOC-3.1.3, Reporting Requirements for Class II Nuclear Facilities and Users of Prescribed Equipment, Nuclear Substances and Radiation Devices. We reiterate those comments as follows.

The REGDOC should not add requirements to the prescribed reporting information in regulations made pursuant to the *Nuclear Safety Control Act* (NSCA). This not only creates unnecessary confusion and increases the administrative burden on licensees without providing information that serves any purpose, but also amounts to regulation-making without the required checks and balances. In this regard, we have specific concerns in relation to the following:

- Section 3.1, paragraphs numbered 2 a, b, c, and 4 are not required by s. 37(4) of the *Packaging and Transport of Nuclear Substances Regulations, 2015* (PTNSR).
- Section 3.2, paragraphs numbered 4 and 11. Again, these are not required by s. 38 of the PTNSR. Further, paragraph 11 is fully addressed under REGDOC-3.2.1 and is not included in REGDOC-3.1.2.
- Section 3.2 exceeds the reporting requirements for 21-day reports.

The above sections should be deleted or revised as necessary to ensure alignment and consistency with the applicable regulations.

Section 3.4 (and Appendix A, I.22.h) should also be amended to reflect the reality of transport incidents by deleting the example related to s. 36(2) of the PTNSR. In many transport incidents, the person who conducts the radiation protection assessment may be a transportation expert who is most familiar with the packaging and potential exposures. In most, this would not be a radiation safety officer.

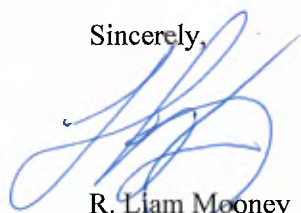
With respect to the section 4, Annual Compliance Report, paragraph numbered 2 requires a separate reporting of information when the document itself is “protected when completed” and cannot be separated from itself. The word “separately” should be deleted from this paragraph.

In addition to the above, we have prepared the following comments with respect to Appendix A:

- A, 1: The Guidance related to s. 29(1) of the NSCA should be deleted. A non-compliance identified in an internal audit is almost always not a contravention of the NSCA and would not be reportable. Requiring the reporting of such non-compliances is contrary to the purpose for conducting internal audits and could result in fewer internal audits.
- B.3.3.a: Guidance section. Replace “quickly” with language commonly used in regulations and regulatory documents such as “immediately” or reword to “...if the situation is resolved prior to the contingency plan being fully implemented”.
- D.10: This section is inconsistent with REGDOC-3.1.2 in which there are different timelines for reporting significant and non-significant counterfeit, fraudulent or suspect discoveries. Consistent with the concerns expressed above, this section should be revised to be consistent with REGDOC-3.1.2.
- E.12.b: Guidance includes bulleted examples that are not used in REGDOC-3.1.2. For consistency, and to avoid uncertainty and different interpretations, these bullets should be deleted.
- E.15: A 21-day report should not be required for a leakage that does not result in a release to the environment under s. 29(1) of the GNSCR. The Guidance should be moved to the Full Report column to qualify when a 21-day report is required.
- F.17: Guidance provides different examples than REGDOC-3.1.2. Again, this can cause different interpretations. In particular, the example “exposure devices, radiation devices or nuclear substances left unattended” is not within the scope of s. 29(1) of GNSCR when the device is within a secured area or site and this may also cause uncertainty. We recommend that this example be deleted or at the very least modified to reflect the regulations.
- I.21: REGDOC-3.1.2 Guidance for s. 32 of the PTNSR states “If a licensee submits this full report, the licensee is **not** required to submit a full report under...subsection 29(1) of the GNSCR) within 21 days or under...section 16 of the RPR within 21 days.” A similar statement should be included in this REGDOC.
- I.22.a: Guidance is not needed for s. 35(a) of the PTNSR. Further, the language used gives the impression that the severity of an accident does not matter when it is intended to mean that the severity of an accident does not affect reporting requirements.
- I.23: Guidance states that an immediate report may be made to a CNSC point of contact when there is no contamination outside the package or if the package has reached its destination whereas the ‘Timing for Preliminary event reports’ in the third column requires the report to be made to the duty officer. This third column entry should be revised to align with the Guidance.

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