



Request for Confidentiality of Material Submitted in Relation to the

Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 - Saskatchewan Research Council Gunnar Legacy Uranium Mine Site

CMD 24-H108

IMPORTANT NOTE:

The purpose of the confidentiality request process is to seek a decision from the Commission as to whether specific information being submitted for a Commission proceeding can be protected. Generally, material received as part of a matter before the Commission is made available to the public by default. The rule of confidentiality (i.e., rule 12 of the [CNSC Rules of Procedure](#)) is applied only if a request for confidentiality is submitted.

The Commission weighs any request for confidentiality against the criteria set out in rule 12 to confirm that:

- the importance of protecting the information outweighs the public interest in public hearings and disclosure of evidence; and
- the measures taken to protect confidentiality are designed to ensure that the public nature of the proceeding will be affected only to the extent necessary to adequately protect the information.

In the interest of enabling a timely decision, any request for confidentiality must be accompanied by redacted versions of all documents named in the request, and/or adequately informative summaries that can be made available to participants and the public. **Please provide the appropriate versions, as applicable.**

It is the responsibility of the requestor to provide an adequately detailed explanation as to how and why sub-rule 12(1) applies.

In the matter of:

Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 – Saskatchewan Research Council Gunnar Legacy Uranium Mine Site

With regard to: **Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 – Saskatchewan
Research Council Gunnar Legacy Uranium Mine Site**

I, **David Sanscartier**, am an authorized representative of **Saskatchewan Research Council Gunnar Legacy Uranium Mine Site**. I understand that:

- documents and information (“the material”) provided to the Canadian Nuclear Safety Commission (“the Commission”) as part of a public proceeding will be made publicly available unless the Commission has rendered a decision to take measures to protect it; and
- regardless of any request for confidentiality or approval of same, the material may be disclosed if the Commission is required by law to disclose it (for example, after a request under the [Access to Information Act](#)).

I hereby request that the Commission take measures to protect the following information, pursuant to rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#) (the Rules):

Material to be Deemed Confidential:

The material to be deemed confidential is identified in Table 1, below.

NOTE 2: *Where the request for confidentiality applies only to part of the submission, the portions to be deemed confidential must be clearly identified to distinguish them from any content that is non-sensitive.*

NOTE 3: The Commission is not responsible for any copyright infringement due to its publication on the public CNSC website of documents that have been submitted by a third party.

Table 1: Material to be Deemed Confidential

	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
1.	Attachment C: SRC Programs and Plans	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <ul style="list-style-type: none"> <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
2.	Attachment D: Prime Contractor (QM Points plans)	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <ul style="list-style-type: none"> <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
3.	Attachment E: Financial Assurance Letter	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.

Request for Confidentiality

4.	Attachment F: Community Engagement Table	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature, <input checked="" type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
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Proposed measure(s) to be taken and Detailed reason(s) for request:

The above-noted material should be protected for the following reasons:

Table 2: Detailed Reason(s) for Request

Item Name	Measure being Requested	Reason(s) for Request
Attachment C: SRC Programs and Plans	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	These documents were developed by SRC and contain material owned by SRC as well as personal information such as emergency contact information that should not be placed on the Internet.
Attachment D: Prime Contractor (QM Points plans)	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	These documents were developed by QM Points and contain material owned by QM Point as well as personal information such as emergency contact information that should not be placed on the Internet.
Attachment E: Financial Assurance Letter	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	This letter was prepared by the Ministry of Energy and Resources for CNSC and not for publication to the Internet.

Table 2: Detailed Reason(s) for Request

Item Name	Measure being Requested	Reason(s) for Request
Attachment F: Community Engagement Table	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	This document provides the name and location of participants of community engagement activities. They may not want their name available on the Internet. SRC cannot contact them in a timely manner to obtain their authorization to publish their name. This attachment should therefore not be placed on the Internet.

Attestation

1. I attest that the above-noted material is not available through any public sources.
2. **MANDATORY:** I have included a **summary** or **redacted** version of the material that provides adequate detail to satisfy the public interest in public hearings and disclosure of evidence.
3. I understand that if this request is not approved by the Commission and/or no protection measures are taken, the information will be part of the public record as per rule 15 of the Rules.
4. I understand that upon receipt of this request, the Commission Registrar will treat the material that is subject to this request as confidential unless and until the Commission makes a ruling to deny this request.

Attachments (provided in Application):

- Attachment C: SRC Programs and Plans
- Attachment D: Prime Contractor (QM Points plans)
- Attachment E: Financial Assurance Letter
- Attachment F: Community Engagement Table

Authorized signature:


 David Sanscartier

 2024/09/04

Date

Summary of Attachments related to SRC application entitled “Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 – Saskatchewan Research Council Gunnar Legacy Uranium Mine Site”

1 Attachment C: SRC Programs and Plans

Attachment C provides the programs and plans of the Environmental Remediation Management System (ERMS). The ERMS provides guidance while conducting work at the Site, and is utilized for planning all activities during Phase 2 and 3 of the Gunnar Mine and Mill Remediation Project. The ERMS and its programs and plans are presented in the main body of the application entitled Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 – Saskatchewan Research Council Gunnar Legacy Uranium Mine Site.

2 Attachment D: Prime Contractor (QM Points) plans

Attachment D provides select plans of the prime contractor’s management system. The plans are listed in the application entitled Renewal of the Waste Nuclear Substance Licence WNSL-W5-3151.00/2024 – Saskatchewan Research Council Gunnar Legacy Uranium Mine Site.

3 Attachment E: Financial Assurance Letter

Attachment E is a letter from the Saskatchewan Ministry of Energy and Resources confirming their responsibility for expenses associated with the Gunnar Mine and Mill Remediation Project.

4 Attachment F: Community Engagement Table

Attachment F presents community engagement activities held by SRC between March 2007 and present related to the project. The location, meeting date, purpose, and participation are presented.