



**Written submission from the
Canadian Nuclear Association**

**Mémoire de
l'Association nucléaire canadienne**

In the Matter of the

À l'égard de

Cameco Corporation, Beaverlodge Project

Cameco Corporation, Projet Beaverlodge

**Application to amend its licence to allow
release of 18 Beaverlodge Project
properties from CNSC licensing**

**Demande de modification du permis de
Cameco visant à retirer 18 propriétés du
projet Beaverlodge du contrôle de la CCSN**

Commission Public Hearing

Audience publique de la Commission

March 24, 2022

24 mars 2022

January 24, 2022

Canadian Nuclear Safety Commission
c/o Louise Levert, Secretariat
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Intervention Regarding Cameco Corporation's request to allow release of 18 decommissioned Beaverlodge Project properties.

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety and environmental stewardship throughout the entire life cycle of the nuclear industry including the release of sites to long-term stewardship or free release.

The Beaverlodge Project is a decommissioned uranium mine and mill site that currently consists of 45 individual properties licenced by the Canadian Nuclear Safety Commission (CNSC). The current licence authorizes Cameco to manage the reclamation, maintenance and monitoring activities at the Beaverlodge properties. Cameco's objective in managing these properties is to protect the health and safety of the public and environment, and to meet the requirements for the transfer of the decommissioned properties to the Saskatchewan Institutional Control (IC) program. The 18 properties in this request meet the established performance criteria and pose minimal risk to public safety or the environment.

As the Commission knows, the decommissioned Beaverlodge uranium mine/mill and associated properties were operated by Eldorado Nuclear Limited between 1952 and 1982. Decommissioning activities took place between 1982 and 1985. In 1988, Eldorado Nuclear was merged with Saskatchewan Mining Development Corporation to form Cameco. Since 1988, Cameco has managed the Beaverlodge properties.

In 2009, Cameco developed the Beaverlodge Management Framework which provided a clear scope for the management of the properties and a systematic process for assessing site specific risks in order to allow transfer of properties to Saskatchewan's Institutional Control program. So far, 24 properties have been transferred to the IC program and one has been free released. This application asks for another 18 decommissioned properties be transferred to the IC program.



As outlined in detail in Cameco's application, the 18 properties in this application have been assessed and meet the established performance criteria and pose minimal risk to the public and the environment. Therefore, they are eligible for long term stewardship in the province of Saskatchewan's IC Program. It is also important to note that the Province has provided notice that it will grant a Release from Decommissioning and Reclamation and that its IC program provides assurance of sufficient funding and monitoring and maintenance to address any unforeseen events.

In 2020, Cameco submitted an updated Environmental Risk Assessment (ERA), which was completed in accordance with CSA N288.6 standard and used a pathways assessment to evaluate potential risks to ecological and human receptors on and downstream of the decommissioned properties. Consistent with previous assessments, the 2020 ERA concluded that the immediate and downstream environments will continue to naturally recover. It also showed that based on the reported use of the land, there is not expected to be any risk to human residing near or consuming food harvested from the properties.

As with all its sites, Cameco has a robust Public Information Program designed to ensure interested audiences and Indigenous groups are informed on a timely basis about activities and any potential impacts on human health and safety or the environment.

In 2016, Cameco signed a collaboration agreement with the seven Athabasca Basin communities - known as the Ya'thi Nene Collaboration Agreement. Under the agreement, the Athabasca Joint Engagement and Environment Subcommittee meets regularly to provide updates and discuss issues around the Beaverlodge Properties.

Cameco also focuses engagement with the northern settlement of Uranium City, including the Uranium City Metis Local 50. It is important to note that Uranium City is the only community with year-round road access to the properties.

The COVID pandemic posed some challenges to regular formats for consultation, but Cameco adapted by holding virtual meetings and tours. The 2020 and 2021 annual meetings normally held in Uranium City were held virtually. Participants were invited from Uranium City and other Athabasca Basin First Nations and communities as well representation from ACFN and MN-S were invited. In addition, virtual tours were created and shared to help people connect with the land when "boots on the ground" tours were not possible. Drone footage was used and the 2021 video included perspectives from local community members.

CNA would like to highlight that during Cameco's engagement activities in 2020 and 2021, no concerns were expressed specific to the 18 decommissioned properties in this licence application.

As outlined above, the CNA believes that Cameco has been a responsible manager of the decommissioned Beaverlodge properties and demonstrated that the applied-for properties are now ready for release to the IC Program.

Please feel free to contact me at couplands@cna.ca or 519-386-0704 © should you have questions or require additional information.

Sincerely,



Steve Coupland

Director of Regulatory and Environmental Affairs
Canadian Nuclear Association