



25-H9.B - CNSC Staff Submission

Denison Mines Corp. Licence Application to Prepare Site and Construct the Wheeler River Project – Supplemental Information

Classification	UNCLASSIFIED
CMD Type	Supplemental
CMD Number	25-H9.B
Reference CMD(s)	N/A
Type of Licensing CMD	A new licence
Hearing	Commission Public Hearing – Part 1 (CSNC staff and proponent)
Date of Hearing	October 8, 2025
Summary	<p>This CMD presents certain corrected information, including:</p> <ul style="list-style-type: none">- Request for delegation of authority for reporting requirements- Corrected table of issues and concerns- Updated licence with correct proposed site map

25-H9.B – Mémoire du personnel de la CCSN

Demande de permis de préparation de l’emplacement et de construction du projet de Wheeler River présentée par Denison Mines Corp. – renseignements supplémentaires

Classification	NON CLASSIFIÉ
Type de CMD	Renseignement supplémentaire
Numéro de CMD	25-H9.B
CMD(s) de référence	N/A
Type de CMD relatif à une décision de permis	Nouveau permis
Audience	Audience publique de la Commission – Partie 1 (personnel de la CCSN et promoteur)
Date de l’audience	8 octobre 2025
Sommaire	<p>Le présent CMD présente certaines rectifications, notamment les suivantes :</p> <ul style="list-style-type: none"> - Demande de délégation de pouvoirs pour les exigences en matière de rapports - Tableau corrigé des questions et des préoccupations - Permis actualisé avec la bonne carte du site proposé



CMD 25-H9.B

Licence Application to Prepare Site and Construct the Wheeler River Project

September 24, 2025

Signed by:

X **Campbell,
Kimberley A**

Digitally signed by Campbell, Kimberley A
DN: C=CA, O=GC, OU=CNSC-CCSN,
CN="Campbell, Kimberley A"
Reason: I am the author of this document
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Foxit PDF Editor Version: 13.0.1

Kimberley Campbell
Acting Director General, Directorate of Nuclear Cycle and Facilities
Regulations

Table of contents

Land acknowledgement.....	1
Plain Language Summary.....	1
1 Overview	3
2 Consultation and engagement.....	3
3 Events and other matters of regulatory interest	4
3.1 Delegation of authority	4
4 Overall Conclusions and Recommendations	5
APPENDIX A : Issues Tracking Table for Métis Nation – Saskatchewan (MN-S) with respect to the Wheeler River Project.....	7
APPENDIX B : Proposed Licence Changes	27
Proposed Licence	27



Land acknowledgement

Canadian Nuclear Safety Commission (CNSC) staff would like to acknowledge that the Wheeler River Project is situated within historic Treaty 10 (1906) and Homeland of the Métis and is within the traditional territories of the Dene, Cree, and Métis peoples.

Plain Language Summary

CNSC staff submitted Commission Member Document 25-H9, *Denison Mines Corp. Licence Application to Prepare Site and Construct the Wheeler River Project* for consideration by the Commission and was publicly posted on August 19, 2025. After the submission was posted, CNSC staff noticed 2 errors: noting incorrect issues within the tracking table for the Métis Nation – Saskatchewan, and an incorrect map for the proposed project in the draft licence. These have been corrected and included for consideration by the Commission, as well as by Indigenous Nations and communities and the public.

CNSC staff also included in this supplemental a request for delegation of authority for reporting to the Commission. This is a standard request and is the same as has been requested and approved for other uranium mine and mill facilities, and other fuel cycle facilities.

These corrections do not affect CNSC staff's conclusions or recommendations as found in CMD 25-H9.

Referenced documents in this CMD are available to the public upon request, subject to confidentiality considerations.



CMD Structure

This Commission Member Document (CMD) includes the following:

- Request for delegation of authority
- Updated issues tracking table for Métis Nation – Saskatchewan
- Proposed licence



1 Overview

This supplemental Commission Member Document (CMD) provides an update to CMD 25-H9 which was posted on [the CNSC website](#) August 19, 2025. This CMD contains a new request for delegation of authority, and corrections to the consultation report and the appended draft licence. The updates do not change the conclusions and recommendations provided in the original CMD submission but provide corrected information for the Commission to make their determination.

2 Consultation and engagement

The Consultation Report, originally included as appendix C in the initial CMD, featured an Issues Tracking Table as part of the references. However, Table A.4 as submitted did not incorporate all the edits provided by Métis Nation – Saskatchewan (MN-S). The revised table can be found in this supplemental CMD in appendix A and the additional information can be found in the column titled *Issue or Concern (including Impacts to Indigenous and/or Treaty Rights)*.



3 Events and other matters of regulatory interest

3.1 Delegation of authority

The Commission may include in a licence any condition it considers necessary for the purposes of the NSCA. The Commission may delegate authority to CNSC staff with respect to the administration of licence conditions, or portions thereof.

As part of CNSC staff's original submission, there is 1 proposed generic licence condition for licence, UML-MINEMILL-WHEELER.00/20XX related to:

3.2 Reporting Requirements

The licensee shall implement and maintain a program for reporting to the Commission or a person authorized by the Commission.

This licence condition currently exists in other uranium mine and mill licences, where the Commission delegated authority to staff for receiving reports to the Commission. CNSC staff is requesting this delegation of authority to align with the other uranium mine and mill licences.

CNSC staff recommend the Commission, for the purposes described in the above licence condition, delegate authority to the following CNSC staff:

- Director, Uranium Mines and Mills Division
- Director General, Directorate of Nuclear Cycles and Facilities Regulation
- Executive Vice-President and Chief Regulatory Operations Officer, Regulatory Operations Branch



4 Overall Conclusions and Recommendations

CNSC staff have provided the additional request for delegation of authority, and have appended the corrections to ensure the Commission, Indigenous Nations and communities, and the public have complete information during their reviews of CMD 25-H9. These corrections do not affect CNSC staff's conclusions or recommendations as found in the original submission.

Glossary

For definitions of terms used in this document, see [REGDOC-3.6, *Glossary of CNSC Terminology*](#), which includes terms and definitions used in the [Nuclear Safety and Control Act](#) and the [Regulations](#) made under it, and in [CNSC regulatory documents](#) and other publications.

Additional terms and acronyms used in this CMD are listed below.

CMD

Commission member document

CNSC

Canadian Nuclear Safety Commission

MN-S

Métis Nation - Saskatchewan

Appendix

APPENDIX A:

Issues Tracking Table for Métis Nation – Saskatchewan (MN-S) with respect to the Wheeler River Project



Note – CNSC staff shared this table with MN-S for their review on June 25th, 2025. On July 23rd, 2025 MN-S provided feedback and edits. CNSC staff shared an updated version on July 29th, 2025 for MN-S’ awareness of the changes made. On August 26th MN-S reached out to CNSC staff about unapplied edits to the table. On August 27th CNSC staff updated the table to reflect the changes and shared the updated table with MN-S.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
MNS01	Aquatic and terrestrial environments MN-S is worried about possible leaks and contamination in bedrock, and that the bedrock may be permeable. MN-S is also concerned about contamination from effluent (including selenium) particularly the impact on Whitefish and Russell Lake. MN-S has emphasized the potential for stigma and avoidance, and the resulting request that a zero-selenium or no increase in contaminants standard be used. MN-S has expressed that all of these effects have the	Aquatic environment/groundwater/fish and fish habitat, accidents and malfunctions/financial guarantee	The CNSC acknowledges MN-S’s concerns regarding potential contamination, particularly impacts on Whitefish and Russell Lake. Denison has committed to the implementation of a freeze wall, double-walled piping with leak detection, and a robust groundwater monitoring program to prevent impacts on the groundwater and aquatic environment. In addition, Denison’s Groundwater Protection and Monitoring Plan and commitments to remediation provide	The MN-S does not deem this issue to be resolved as MN-S indicates Denison and the CNSC have not adequately addressed concerns regarding the effects on the aquatic and terrestrial environment. MN-S notes inconsistent information provided by Denison regarding the basement rock permeability and outstanding concerns regarding the use of a mixing zone for treated effluent entering the receiving waterbody.



	<p>potential to impact Métis harvesting, fishing, hunting and trapping for traditional, subsistence, family subsistence, community support, ceremonial, and commercial purposes. Such impacts could include effectively extinguishing Métis commercial fishing rights through harvester avoidance and market stigma of fish with the potential of contamination.</p> <p>MN-S has also highlighted the need for robust monitoring by Denison, clarity on potential impacts to water resources, financial guarantees for remediation, and a study of the avoidance impacts of past developments such as Cluff Lake.</p>		<p>assurance that environmental protection measures will be put in place if the project is approved.</p> <p>Denison has also committed to avoiding disruption of critical habitats to the extent possible and to implementing appropriate mitigation measures, including scheduling certain project activities outside of timeframes that are sensitive periods for wildlife and avoiding wetlands and instituting proper buffers, whenever possible, and will have a Road and Traffic Monitoring Plan and Pre-Clearance Wildlife Monitoring Plan. Denison has also developed the Caribou Management Framework, which highlights additional mitigation (offset) measures specific to</p>	<p>Potential for contaminants entering the receiving environment pose risks to the Métis exercise of traditional activities and Aboriginal rights.</p> <p>In addition, the MN-S asserts that caribou health and recovery potential has not been appropriately considered.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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	<p>MN-S has also expressed concerns over potential impacts on caribou populations and the broader terrestrial ecosystem, in addition to impacts of increased traffic and noise on wildlife. MN-S has emphasized that provincial caribou recovery plans are inadequate and cannot be relied on to address project impacts.</p>		<p>potential residual effects on caribou, and the Biodiversity Management Plan (for terrestrial and avian species).</p> <p>In addition, Denison has assessed potential impacts caused by the proposed project via changes in air quality and acoustics through modelling. Denison has also committed to mitigation measures to address the potential impacts, such as dust suppression techniques and equipment mufflers to reduce acoustic disturbance, to ensure they remain within all applicable limits and regulations.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that</p>	
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			<p>decommissioning commitments and obligations are met by the licensee, including those relating to the protection of the aquatic environment. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their decommissioning plans as the plans are developed.</p> <p>CNSC staff are satisfied that Denison's proposed project, including its various safety features and components, meet regulatory requirements and that Denison will have efficient mitigation and prevention measures in place to protect the environment. If a licence were to be issued, CNSC staff would also ensure compliance of the facility against all relevant regulatory requirements through various</p>	
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			compliance activities, including regular inspections and desktop reviews. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
MNS02	<p>Cumulative effects and past environmental impacts</p> <p>MN-S feels the cumulative effects assessment does not account for past environmental and social impacts that persist today, and that it is not sufficient to capture all impacts, such as to woodland caribou, and to consider Métis perspectives.</p>	Cumulative Effects	<p>The CNSC recognizes the importance of assessing cumulative effects for proposed projects, particularly in the context of historical and ongoing impacts on Indigenous Nations and communities.</p> <p>Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S maintains that cumulative effects have not been appropriately considered and remain concerned that the Métis exercise of traditional activities and Aboriginal rights will be adversely impacted due to impacts arising from cumulative effects.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage</p>



			<p>Indigenous land and resource use. Denison considered whether residual adverse effects of the proposed project on a given valued component might overlap spatially or temporally with effects resulting from other past, present, and reasonably foreseeable projects or activities.</p> <p>CNSC staff are satisfied with how Denison addressed cumulative effects within their Environmental Impact Statement as per the requirements of CEAA 2012, consistent with <u>Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012.</u></p> <p>CNSC staff expect Denison to continue engaging with MN-S on these concerns if the project is approved.</p>	<p>and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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MNS03	<p>Indigenous participation and trust</p> <p>MN-S has emphasized the need for MN-S involvement in monitoring programs and want Métis members to be trained to sample, analyze, and understand environmental data. MN-S has also flagged indicated that they want their input on mitigation plans to be incorporated, and Métis to be involved throughout the lifespan on the Project, including through to closure. The MN-S has emphasized that monitoring alone cannot address project impacts.</p>	<p>Indigenous consultation/environmental monitoring</p>	<p>The CNSC is committed to ensuring that Indigenous communities, including MN-S, are meaningfully involved in environmental oversight for the proposed project if it is approved.</p> <p>CNSC staff have determined that Denison has demonstrated a commitment to working with identified Indigenous Nations and communities throughout the life of the project, including establishing working relationships and developing engagement work plans. Denison has since funded and integrated a Métis Knowledge Study into their final Environmental Impact Statement. Denison has also committed to sharing information on environmental monitoring plans with identified</p>	<p>The MN-S does not deem this issue to be resolved as MN-S seeks firm, enforceable commitments, from Denison, the CNSC, or both, to ensure that it can be an active participant in the monitoring process and can ensure appropriate measures are taken to address any adverse effects of the Project identified through monitoring.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			<p>Indigenous Nations and communities as they develop, including the MN-S with respect to decommissioning planning, mitigation, and monitoring.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the Constitution Act, 1982. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the</p>	
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			applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
MNS04	<p>Engagement and traditional land use</p> <p>MN-S has expressed dissatisfaction with Denison's engagement, citing misleading logs, lack of outreach, Denison's failure to meet created expectations, and insufficient consultation on project activities. MN-S has indicated they feel excluded from regulatory discussions and have concerns about Denison's communication with municipalities instead of MN-S.</p>	Indigenous consultation/traditional practices/Indigenous Rights	Denison is required to report on its Indigenous engagement activities and has committed to continued engagement with MN-S at their direction, inclusive of engagement in NR1 and NR3. In addition, Denison has funded and integrated a Métis Knowledge Study into their final Environmental Impact Statement, to ensure Métis knowledge, values, and perspectives are considered throughout the process. Denison has also revised their final	The MN-S does not deem this issue to be resolved as the MN-S maintains that engagement to-date has not been consistent with a consent-based approach, and that the preliminary Denison-MN-S consent-based discussions that commenced in early 2025 were slow to advance and should be provided with a meaningful opportunity to occur before the Project is assessed.



	<p>MN-S is concerned about the lack of engagement regarding potential impacts on Métis traditional use activities and cultural practices. MN-S feel their perspectives, including the concerns of NR1 and NR3 communities, have been overlooked.</p>		<p>Environmental Impact Statement to reflect that the project is being proposed within the MN-S Homeland.</p> <p>CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including MN-S, annually.</p>	<p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
MNS05	Economic opportunities	Socio-economic considerations	The CNSC acknowledges MN-S's concerns about economic inclusion and is	The MN-S does not deem this issue to be resolved as MN-S deems



	<p>MN-S is concerned over the lack of concrete economic benefits for Métis communities, limited training opportunities, and insufficient support for Métis people to participate in the workforce.</p> <p>MN-S also raises a concern regarding (i) the loss of the value of the economic resource from the Métis title claim if the Métis title claim is recognized and (ii) the loss of the socio-economic opportunities which would be available if the project were to be developed under Métis control if the Métis title claim is recognized.</p>		<p>satisfied that Denison's commitments address these concerns. Denison has developed a human resource development plan which prioritizes Indigenous Nations and communities for employment and training, and their procurement strategy emphasizes local Métis businesses.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage MN-S to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities for MN-S. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains</p>	<p>the Aboriginal title claim as central to the Métis effort to strengthen the Métis Nation and advance self-government and institutional sovereignty.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			<p>responsive and continues to consider and address concerns raised, to the extent possible.</p> <p>In regard to MN-S' concern on the Métis title claim, CNSC are looking into the title claim to understand how and if it may impact this project. CNSC will continue review information as it is released and encourage MN-S to continue to share any information with CNSC on the Métis title claim. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
MNS06	<p>Community health and well-being</p> <p>MN-S has expressed concerns over potential impacts on community</p>	Human health	<p>The CNSC recognizes the importance of community health and wellbeing.</p> <p>Denison's Human Resource Development</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S remains concerned about activities which result in impacts to</p>



	cohesion and health services.		<p>Plan includes provisions for community-level engagement and support, and the CNSC expects Denison to continue working with MN-S to identify and address health and well-being concerns throughout the facility lifecycle.</p> <p>If the proposed project is accepted, Denison has committed to including country foods (e.g. blueberries, fish, etc.) in their environmental monitoring program and will be developing a country food monitoring document to support their licence to operate. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are committed to building a</p>	<p>communities from illicit substances and transient populations often associated with resource extraction industries. In addition, the MN-S remains concerned that the development of the Aboriginal title claim area will discourage Métis land use in the vicinity of the Project now and in the future.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			meaningful and trusting relationship with MN-S, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with MN-S on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.	
MNS07	Waste management and long-term impacts MN-S has expressed concerns about waste disposal methods, hazardous waste storage, and long-term reclamation, fearing contamination and potential abandonment without proper remediation. Additionally, post-decommissioning impacts on animal populations and the ability to harvest for traditional, subsistence, family subsistence,	Waste management/long-term impacts	As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety for all nuclear facilities across the country. The CNSC regulates nuclear facilities throughout entire facility lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health. CNSC staff are committed to	The MN-S does not deem this issue to be resolved as the The MN-S does not deem this issue to be resolved as the MN-S requests the CNSC to address the MN-S's concerns regarding its Aboriginal title claim, including the loss of socio-economic potential, the potential for alienation from these significant lands through loss of land use knowledge transfers and through stigma, and the potential extinguishment of any



	<p>community support, ceremonial, and commercial purposes, including through stigma and avoidance, are also a concern for MN-S.</p>		<p>building a meaningful and trusting relationship with MN-S, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with MN-S on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning and waste management commitments and obligations are met by the licensee, including the safe handling and storage of all radioactive materials. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their</p>	<p>Métis exercise of traditional activities and Aboriginal rights.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			<p>decommissioning plans as the plans are developed.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and</p>	
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			monitoring activities on this topic and other topics of concern, should this Project be approved.	
MNS08	<p>Indigenous Consultation and FPIC Process</p> <p>MN-S is concerned that no specific efforts have been made by CNSC and Denison to consider MN-S' position through the lens of Free, Prior, and Informed Consent (FPIC) and to provide a process that is consistent with seeking Métis FPIC.</p>	Indigenous consultation	CNSC staff acknowledge the issues and concerns that MN-S has raised to date related to the Project. CNSC staff have worked to understand, assess and address the concerns to the greatest extent possible through consultation, having focused discussions, providing detailed responses, reflecting MN-S' views in CNSC's documentation, communicating MN-S's concerns to Denison and discussing the Project at regular scheduled meetings with MN-S to better understand their concerns and identify commitments, mitigations and a path forward to addressing the concerns. CNSC staff's view is that the approach to	<p>The MN-S does not deem this issue to be resolved as the MN-S submits that the MN-S has not been afforded a consent-based process.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>



			<p>consultation conducted for the Project has been in line with best practises and is flexible based on the specific needs and requests of each potentially impacted Indigenous Nation and community, including MN-S. CNSC will continue to monitor Denison's commitments to MN-S and engagement through the lifecycle of the Project, if approved and ensure that Denison is addressing MN-S' questions, concerns and requests, as per REGDOC: <i>3.2.2 Indigenous Engagement</i>.</p> <p>CNSC staff are committed to working with MN-S through the RIA process and further consultation on the Project to identify additional commitments, mitigations and a path forward to addressing the concerns related to the</p>	
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			<p>Project, as appropriate in order to work towards consensus on the key issues and the Project.</p> <p>CNSC staff encourage MN-S to share information with CNSC on understanding their FPIC process and position on the Project. CNSC staff will continue to work with MN-S regarding their FPIC process and efforts to work towards seeking their consent for the Project. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including MN-S, annually.</p>	
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APPENDIX B:

Proposed Licence Changes

Proposed Licence



**URANIUM MINE LICENCE
DENISON MINE CORP.
WHEELER RIVER PROJECT**

I) LICENCE NUMBER: UML-MINEMILL-WHEELER-00/20##

II) LICENSEE: Pursuant to section 24 of the *Nuclear Safety and Control Act*, this licence is issued to:

**Denison Mine Corp.
345 4th Avenue South
Saskatoon, SK
Canada, S7K 1N3**

III) LICENCE PERIOD: This licence is valid from XXXX to XXXX, unless suspended, amended, revoked or replaced.

IV) LICENSED ACTIVITIES:

This licence authorizes the licensee to:

- a) prepare site and construct a nuclear facility (hereinafter, “the facility”) for the mining of uranium ore and the production of uranium concentrate at a site known as the Wheeler River Project in the province of Saskatchewan, as shown on the drawing referenced in appendix A to this licence
- b) possess, use and store nuclear substances and radiation devices that are required for or associated with laboratory studies, field studies, fixed gauge use and borehole logging devices.

V) EXPLANATORY NOTES:

- a) Unless otherwise provided for in this licence, words and expressions used in this licence have the same meaning as in the *Nuclear Safety and Control Act* and its associated Regulations.
- b) The Wheeler River Operations Licence Conditions Handbook (LCH) identifies the criteria used to meet the conditions of this licence. The LCH also provides information regarding delegation of authority and document version control.

VI) CONDITIONS:

G. GENERAL

G.1 Licensing Basis for Licensed Activities

The licensee shall conduct the activities described in Part IV of this licence in accordance with the licensing basis, defined as:

- (i) the regulatory requirements set out in the applicable laws and regulations
- (ii) the conditions and safety and control measures described in the facility's or activity's licence and the documents directly referenced in that licence
- (iii) the safety and control measures described in the licence application and the documents needed to support that licence application

unless otherwise approved in writing by the Canadian Nuclear Safety Commission (hereinafter "the Commission").

G.2 Notification of Changes

The licensee shall give written notification of changes to the facility or its operation, including deviation from design, operating conditions, policies, programs and methods referred to in the licensing basis.

G.3 Financial Guarantee

The licensee shall maintain a financial guarantee for decommissioning that is acceptable to the Commission.

G.4 Public Information and Disclosure

The licensee shall implement and maintain a public information and disclosure program.

G.5 Environmental Assessment Conditions and Commitments

The licensee shall implement the Wheeler River Project Environmental Assessment (EA) conditions and regulatory commitments.

G.6 Indigenous Engagement

The licensee shall implement and maintain an Indigenous engagement program.

1. *MANAGEMENT SYSTEM*

1.1 Management System

The licensee shall implement and maintain a management system.

2. *HUMAN PERFORMANCE MANAGEMENT*

2.1 Training Program

The licensee shall implement and maintain a training program.

3. *OPERATING PERFORMANCE*

3.1 Operations Program

The licensee shall implement and maintain an operating program, which includes a set of operating limits.

3.2 Reporting Requirements

The licensee shall implement and maintain a program for reporting to the Commission or a person authorized by the Commission.

3.3 Nuclear Substances and Radiation Devices

The licensee shall implement and maintain a program for nuclear substances and radiation devices.

4. *SAFETY ANALYSIS*

4.1 Safety Analysis Program

The licensee shall implement and maintain a safety analysis program.

5. *PHYSICAL DESIGN*

5.1 Design Program

The licensee shall implement and maintain a design program.

6. *FITNESS FOR SERVICE*

6.1 Fitness for Service Program

The licensee shall implement and maintain a fitness for service program.

7. *RADIATION PROTECTION*

7.1 Radiation Protection Program

The licensee shall implement and maintain a radiation protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

8. *CONVENTIONAL HEALTH AND SAFETY*

8.1 Conventional Health and Safety Program

The licensee shall implement and maintain a conventional health and safety program.

9. *ENVIRONMENTAL PROTECTION*

9.1 Environmental Protection Program

The licensee shall implement and maintain an environmental protection program, which includes a set of action levels. When the licensee becomes aware that an action level has been reached, the licensee shall notify the Commission within 24 hours.

10. *EMERGENCY MANAGEMENT AND FIRE PROTECTION*

10.1 Emergency Preparedness Program

The licensee shall implement and maintain an emergency preparedness program.

10.2 Fire Protection Program

The licensee shall implement and maintain a fire protection program.

11. *WASTE MANAGEMENT*

11.1 Waste Management Program

The licensee shall implement and maintain a waste management program.

11.2 Decommissioning Plan

The Licensee shall maintain a decommissioning plan

12. SECURITY

12.1 Security Program

The licensee shall implement and maintain a security program.

13. SAFEGUARDS AND NON-PROLIFERATION

13.1 Safeguards Program

The licensee shall implement and maintain a safeguards program.

SIGNED at OTTAWA, this _____ day of _____, 2026.

Pierre Tremblay, President
on behalf of the Canadian Nuclear Safety Commission

APPENDIX A

LOCATION OF THE WHEELER RIVER PROJECT

The location of the Wheeler River Project is shown on the map below.

