



MEMORANDUM

NOTE DE SERVICE

To Candace Salmon
A Commission Registrar, CNSC

Security Classification

UNCLASSIFIED

Our File :

[ccm#](#)

Fully releasable ATIP :

[Yes](#)

10/23/2025


From
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Kim Campbell, acting Director General / d...
Signed by: Campbell, Kimberley A

Subject CNSC Staff's Review of NexGen's Request for Confidentiality in Relation to CNSC Staff CMD 25-H12
Objet Reference Documents / Examen par le personnel de la CCSN de la demande de confidentialité de
NexGen concernant les documents de référence du personnel de la CCSN CMD 25-H12

PURPOSE/OBJECTIF

The purpose of this memorandum is to provide CNSC Staff's comments to the Commission regarding the matter of NexGen Energy Ltd.'s (NexGen's) request to protect from public disclosure the documents submitted in the request for confidentiality ( [CMD 25-H12-NXG-RFC.pdf](#)).

The CNSC Registry subsequently requested that CNSC staff provide their advice to the Commission on the Matter.

DISCUSSION

CNSC staff reviewed the list of documents and related details provided by NexGen. This information, along with CNSC staff comments, are included in Table 1. For each of the 3 documents, NexGen has requested the entire contents be kept confidential with only public summaries or redacted versions provided.

To CNSC staff's knowledge, NexGen's documents provided in the confidentiality request have not been made available elsewhere publicly. The documents listed in this table have consistently been treated as confidential in CNSC staff's dealings with NexGen.

The public summaries provided by NexGen are acceptable to CNSC staff in that they accurately represent the content found in the full versions of the documents except for the Nuclear Substance and Radiation Device Management (ROOKRAD-PRO-00008) which CNSC staff assessed as not meeting the confidentiality criteria.

CONCLUSION

CNSC staff have reviewed NexGen's request for confidentiality and have provided comments as to whether the proposed confidentiality requests are appropriate. It is CNSC staff's recommendation that NexGen's request be accepted by the Commission with the exception of item number 2 -Nuclear Substance and Radiation Device Management (ROOKRAD-PRO-00008).

Prepared by: Dana Pandolfi, Senior Project Officer (CNSC)

Attachment: Table 1

Contact/Personne-ressource: Dana Pandolfi, 613-297-4340
Canadian Nuclear Safety Commission

Table 1: Material subject to the request for confidentiality

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
1.	Rook I Mining and Milling Facility Description Manual (ROOK-ENGMAN-00001) 11 Includes all referenced documents (e.g., design criteria, assessments, studies) contained within supporting appendices and annexes	x Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	x The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, x Commercial, x Scientific, x Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<i>The Rook I Mining and Milling Facility Description Manual</i> and the documents included within its appendices and annexes are considered confidential due to the commercial, scientific, and technical details (e.g., design criteria, drawings, hazard analyses, technical studies and reports) included and incorporated into the body of the document, which constitutes NexGen's proprietary intellectual property. Public disclosure of these materials would allow competitors to reproduce designs and processes developed through significant investment, thereby compromising NexGen's economic	CNSC staff find that NexGen's rationale to withhold the entire document is acceptable. CNSC staff do not accept that the information involves national or nuclear security elements, however this does not change the view that the other elements are sufficient to justify withholding the entire document. NexGen's public summary is an accurate summary of the document.

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				<p> advantage. The <i>Rook I Mining and Milling Facility Description Manual</i> is a living document that is subject to ongoing review and updates as the Project proceeds. Early release may result in outdated or incomplete information being misinterpreted and misunderstood. Confidentiality of the <i>Rook I Mining and Milling Facility Description Manual</i> is critical to protecting both safety and the Project's commercial value. A high-level summary of the <i>Rook I Mining and Milling Facility Description Manual</i> and of infrastructure that is understood to be of particular interest to Indigenous Nations, communities, and </p>	

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				members of the public is provided in NexGen's Commission Member Document (CMD:25-H12.1)	
2.	Nuclear Substance and Radiation Device Management (ROOKRAD-PRO-00008)	x Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	x The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, x Commercial, x Scientific, x Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	The Nuclear Substance and Radiation Device Management procedure is a detailed, proprietary management system document that outlines methods for safely and securely maintaining nuclear substances and radiation devices in compliance with regulatory requirements. Public disclosure could compromise the effectiveness of the procedure and enable competitors to replicate confidential and proprietary information. A high-level summary of the Nuclear Substances and Radiation Devices Management procedure is provided in NexGen's	CNSC staff do not accept the applicant's assessment that the information involves national or nuclear security elements, commercial, scientific or technical information. This document is a high-level procedure for how NexGen plans on managing nuclear substances and radiation devices on site. Though it is referenced in NexGen's Security program, CNSC staff did not find any information that would justify making this document confidential.

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				Commission Member Document (CMD:25-H12.1) and in the Rook I Radiation Protection Program, both of which are publicly available as part of NexGen's submissions.	
3.	Rook I Preliminary Decommissioning and Reclamation Cost Estimate (ROOK-DECPLN-00002)	x Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: x Financial, x Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	The <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i> is considered confidential as it relies on and incorporates information from financial models developed for the Project (e.g., those serving as the basis for unit costs), which are not in the public domain and could compromise NexGen's economic advantage. The <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i> contains sensitive information including asset-specific details, detailed cost	CNSC staff find that NexGen's rationale to withhold the entire document is acceptable. CNSC staff do not accept that the information involves national or nuclear security elements, however this does not change the view that the other elements are acceptable to justify withholding the entire document. NexGen's public summary presents an accurate summary of the document.

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				<p>assumptions, and financial security arrangements, the disclosure of which could provide competitors with strategic insights while undermining NexGen's ability to negotiate competitively. Public disclosure would compromise confidentiality and create risks to the Project's financial and operational plans. A high-level summary of the <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i>, including the total cost estimate value, is provided in the NexGen's Commission Member Document (CMD:25-H12.1</p>	