

MEMORANDUM

NOTE DE SERVICE

Security Classification

UNCLASSIFIED

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Yes

To Candace Salmon
A Commission Registrar, CNSC

From
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Subject CNSC Staff's Review of Cameco's Request for Confidentiality in Relation to the Licence Renewal
Objet Application for Cameco's Port Hope Conversion Facility / Examen par le personnel de la CCSN de la demande de confidentialité de Cameco concernant la demande de renouvellement du permis pour l'installation de conversion de Cameco à Port Hope

PURPOSE/OBJECTIF

The purpose of this memorandum is to provide CNSC staff's comments to the Commission regarding the matter of Cameco Corporation's (Cameco) request to protect from public disclosure the documents submitted in the request for confidentiality in relation to the Licence Renewal Application for Cameco's Port Hope Conversion Facility : [Request for Confidentiality From - Cameco Corporation's Port Hope Conversion Facility](#). Cameco also provided [Public Summaries - Request for Confidentiality - Cameco Corporation's Port Hope Conversion Facility](#).

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 Cameco. This information, along with CNSC staff comments, are included in Table 1. For the 10 documents, Cameco has requested the entire content be kept confidential.

CONCLUSION

CNSC staff reviewed Cameco's requests for confidentiality and, as requested, provided comments on the proposed confidentiality requests in Table 1. To CNSC staff's knowledge, the Cameco documents

identified in the confidentiality request have not been made available elsewhere publicly. The documents listed in Table 1 have consistently been treated as confidential in CNSC staff's dealings with Cameco. Finally, the document summaries provided by the licensee are considered to be reasonable.

Prepared by: Mike Jones, Senior Project Officer (CNSC)

Attachment: Table 1

Contact/Personne-ressource: Mike Jones, 613-293-2986
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.	Cameco Corporation, Port Hope Conversion Facility, Internal Dosimetry Technical Basis Document	<input checked="" type="checkbox"/> 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: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" 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)	<p>The information contained in the document should be restricted or prohibited pursuant to paragraph 12(1)(b) of the CNSC Rules of Procedure for the following reasons:</p> <p>The information contained in the document consists of confidential scientific and technical information that is consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. The document includes detailed descriptions of internal dosimetry models, assumptions, methodologies, site-specific parameters, and technical justifications used to demonstrate regulatory compliance.</p> <p>Additionally, the disclosure of this information could reasonably be expected to prejudice Cameco's</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p> <p>Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.</p>

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				<p>competitive position, as it would reveal proprietary technical approaches and analytical practices developed by Cameco for internal dose assessment and regulatory demonstration that could be used by competitors or third parties.</p> <p>The information sought to be prohibited is being provided to the CNSC in confidence and is to be received in confidence by the CNSC. A summary has been provided to satisfy the public interest by conveying the overall approach without disclosing confidential technical detail.</p>	
2.	Cameco Corporation, Port Hope Conversion Facility, Safety Report	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial,	<p>The information contained in the document should be restricted or prohibited pursuant to paragraph 12(1)(b) of the CNSC Rules of Procedure for the following reasons:</p> <p>The information contained in the document consists of</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p>

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			<input type="checkbox"/> Scientific, <input checked="" 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)	<p>confidential commercial, scientific, and technical information that is consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. The Safety Report contains detailed descriptions of facility-specific design features, operational systems, safety analyses, assumptions, and margins used to demonstrate compliance with regulatory requirements.</p> <p>Disclosure of this information could reasonably be expected to prejudice Cameco's competitive position, as it would reveal detailed technical and operational information about facility systems, safety strategies, and analytical approaches that are not publicly available and that provide insight into Cameco's proprietary operating practices.</p>	<p>Cameco's provided public summary is reasonable in that it conveys the safety conclusions and high-level information.</p> <p>It is expected that there will be a more detailed summary of the 2025 Safety Report posted on the Cameco Fuel Services website in 2026.</p>



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				<p>The information sought to be prohibited is being provided to the CNSC in confidence and is to be received in confidence by the CNSC. A summary has been provided that conveys safety conclusions and high-level information necessary to inform the public interest without disclosing confidential details.</p> <p>The Safety Report contains detailed descriptions of the facility layout, system relationships, operating modes, and safety system behaviour. Disclosure of this information would provide insight into building functions, system adjacencies, emergency power transfer times, fail-safe responses, hazardous material inventories, and credible accident scenarios, including consequence modelling.</p>	

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				Public release of these details could reasonably be expected to compromise the security of the facility and its systems, by enabling identification of vulnerable systems, timing windows, and high-consequence targets. The information is therefore sensitive from a security and public safety standpoint and meets the criteria under Rule 12 for protection from public disclosure.	
3.	Cameco Corporation, Port Hope Conversion Facility, Derived Release Limit	<input checked="" type="checkbox"/> 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: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and	<p>The information contained in the document should be restricted or prohibited pursuant to paragraph 12(1)(b) of the CNSC Rules of Procedure for the following reasons:</p> <p>The information contained in the document consists of confidential technical and scientific information that is consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. The document</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p> <p>This document is provided by an outside contractor and is specific to the PHCF facility.</p> <p>Cameco's provided public summary is reasonable in</p>

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			<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)	<p>includes site-specific derivations, modelling assumptions, calculation methodologies, and technical inputs used to establish derived release limits for the facility.</p> <p>Disclosure of this information could reasonably be expected to prejudice Cameco's competitive position by revealing proprietary analytical methodologies, assumptions, and modelling approaches used by Cameco in demonstrating regulatory compliance and optimizing operational performance.</p> <p>The information sought to be prohibited is being provided to the CNSC in confidence and is to be received in confidence by the CNSC. A summary has been provided that communicates the regulatory basis and conclusions while minimizing disclosure of confidential</p>	<p>that it communicates the regulatory basis and conclusions.</p>

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				technical detail in the public interest.	
4.	Cameco Corporation, Port Hope Conversion Facility, Preliminary Decommissioning Plan and Financial Guarantee	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input checked="" type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" 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)	<p>The information contained in the documents should be restricted or prohibited pursuant to paragraph 12(1)(b) of the CNSC Rules of Procedure for the following reasons:</p> <p>The information contained in the documents consists of:</p> <ul style="list-style-type: none"> confidential commercial, financial and technical information that is consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. employee names, titles and signatures, which are considered personal information and the person affected has not consented to the disclosure. <p>Additionally, the disclosure of this information could reasonably be expected to prejudice Cameco's competitive position because</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p> <p>CNSC staff note that as per the Record of Decision - Commission Ruling on Request to Protect Confidential Information, on December 4, 2023 on the Application for Acceptance of Cameco's Port Hope Conversion Facility Revised Financial Guarantee, Cameco's Request for Confidentiality regarding the revised PDP was accepted by the Commission.</p> <p>Cameco's provided public summary is reasonable in that presents an accurate</p>

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				<p>the documents provide details of Cameco's business practices, including the rationale underlying cost estimates and assumptions, related to preliminary decommissioning planning and cost estimating that would be beneficial to Cameco's competitors.</p> <p>The information sought to be prohibited is being provided to the CNSC in confidence and is to be received in confidence by the CNSC.</p>	<p>summary of the overall approach.</p> <p>The Cameco Fuel Services website contains a more detailed summary of the Preliminary Decommissioning Plan from 2023. CNSC staff recommends that Cameco be requested to submit this summary to the Registry in support of the confidentiality request.</p>
5.	Cameco Corporation, Port Hope Conversion Facility, Security Plan	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and	<p>The information contained in the document should be restricted or prohibited pursuant to paragraph 12(1)(a) and paragraph 12(1)(b) of the CNSC Rules of Procedure for the following reasons:</p> <p>The information contained in the document involves nuclear security elements and consists of confidential technical and security-sensitive information that is</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p> <p>Under the NSCA and its Regulations the security program is not permitted to be shared outside those with an operational need-to-know.</p>

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			<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)	<p>consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. The Security Plan includes detailed information regarding security arrangements, response measures, vulnerabilities, and protective strategies for the facility.</p> <p>Disclosure of this information could reasonably be expected to compromise the effectiveness of the security measures in place and could endanger the security of the facility and individuals by providing sensitive information that could be misused.</p> <p>The information sought to be prohibited is being provided to the CNSC in confidence and is to be received in confidence by the CNSC.</p>	<p>Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.</p>
6.	Cameco Corporation, Port Hope Conversion Facility, Fire Safety Plan	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified	<input checked="" type="checkbox"/> The information involves national or nuclear security elements	<p>The Fire Safety Plan includes detailed information on facility layout, building use, hazard locations, critical</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p>

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		in the document	<input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> 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)	utilities, emergency power arrangements, fire detection and suppression systems, and responder access routes. Disclosure of this information could allow a third party to identify critical assets, single-point vulnerabilities, life-safety system configurations, and preferred responder pathways, which could undermine both facility security and emergency response effectiveness. As such, public disclosure could reasonably be expected to pose a risk to safety and security and should be treated as confidential under Rule 12.	This information has consistently been treated as confidential in CNSC's Interactions with Cameco. Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.
7.	Cameco Corporation, Port Hope Conversion Facility, Radioisotope Source Control Program (CAP:RAD:13)	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial,	Rationale for Confidentiality (Rule 12) This document contains a detailed inventory of radioisotope sources, including exact physical locations, device identifiers,	CNSC staff are not aware of this information being publicly available elsewhere. This information has consistently been treated as confidential in CNSC's Interactions with Cameco.

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			<input type="checkbox"/> 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)	radionuclide types, and activity levels. Public release of this information would significantly increase the risk of unauthorized access, theft, or malicious targeting of regulated radioactive sources. Disclosure could directly compromise source security and contravene the intent of national and international source control principles. The information therefore meets Rule 12 criteria for confidentiality due to security and public safety considerations.	CNSC staff note that inventories of radioisotope sources are always treated as confidential across the nuclear industry. Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.
8.	Cameco Corporation, Port Hope Conversion Facility, Emergency Response Plan	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific,	The Emergency Response Plan discloses detailed information regarding command and control locations, alarm logic, escalation thresholds, internal and external notification triggers, security procedures, and site-specific emergency response strategies. The document also includes names, roles,	CNSC staff are not aware of this information being publicly available elsewhere. This information has consistently been treated as confidential in CNSC's Interactions with Cameco. Cameco's provided public summary is reasonable in that it presents an accurate

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			<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)	and direct contact details of key personnel. Public disclosure would reveal defensive decision-making processes, response timing assumptions, security measures, and high-consequence facility areas, potentially allowing exploitation of emergency response procedures. Release of this information could reasonably be expected to compromise facility security and emergency preparedness, and therefore meets the confidentiality criteria set out in Rule 12.	summary of the overall approach.
9.	Cameco Corporation, Port Hope Conversion Facility, Fire Hazard Analysis	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial,	The Fire Hazard Analysis contains detailed evaluations of building layouts, internal configurations, fire protection system coverage, emergency response constraints, water supply and hydrant locations, and worst-case fire scenarios. Disclosure of this information would provide	CNSC staff are not aware of this information being publicly available elsewhere. This information has consistently been treated as confidential in CNSC's Interactions with Cameco. This document is provided by an outside contractor

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			<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)	insight into fire protection limitations, emergency response dependencies, and high-consequence fire scenarios, which could be misused to identify facility vulnerabilities. Public access to this level of detail could reasonably compromise both safety and security, supporting confidential treatment under Rule 12.	<p>and is specific to the PHCF facility.</p> <p>Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.</p>
10.	Cameco Corporation, Port Hope Conversion Facility, Fire Protection Plan	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and	<p>The Fire Protection Plan documents the facility's fire protection philosophy, defense-in-depth approach, emergency response assumptions, organizational roles, and the scope of on-site versus external response capabilities.</p> <p>Public disclosure would reveal assumptions, boundaries, dependencies, and response timelines, including potential windows</p>	<p>CNSC staff are not aware of this information being publicly available elsewhere.</p> <p>This information has consistently been treated as confidential in CNSC's Interactions with Cameco.</p> <p>Cameco's provided public summary is reasonable in that it presents an accurate summary of the overall approach.</p>



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			<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)	of reduced capability. This information could be used to infer vulnerabilities in facility protection and emergency response, posing a security risk. As such, the document meets the criteria for confidentiality under Rule 12.	