



Request for Confidentiality of Material Submitted in Relation to

Licence Renewal Application for Cameco's Port Hope Conversion Facility

This form supports the [Directive on Requesting Confidentiality](#). Review the Directive for important information about completing this form and the documents that must be submitted with it.

The completed form and attachments **must be submitted to** the [Commission Registrar](#).

With regard to: **Licence Renewal Application for Cameco's Port Hope Conversion Facility**

I, Liam Mooney, am an authorized representative of Cameco Corporation, Port Hope Conversion Facility. I understand that:

- material provided to the Canadian Nuclear Safety Commission ("the Commission") as part of a public hearing will be made publicly available unless the Commission makes a decision to protect it; and
- regardless of any request for confidentiality and decision by the Commission, 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 prohibit the publication and disclosure of the following information under rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#) (the Rules).

NOTE 1: Any additional protective measures being requested must be identified in a letter attached to this form.

Material for which a request for confidentiality is submitted:

The material that is subject to this request for confidentiality is clearly identified in Table 1, below.

NOTE 2: Where the request for confidentiality applies only to part of a document, relevant portions must be clearly identified "CONFIDENTIAL" to distinguish them from content that is non-confidential.

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

Table 1: Material subject to the request for Confidentiality				
	Item Name	Portion(s) covered by the Request for Confidentiality	Applicable Criteria Check all that apply	Rationale Explain how the criteria in Rule 12 applies and how the summary or redacted version satisfies the public interest
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 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>

Request for Confidentiality

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, <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>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 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>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</p>
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				scenarios, including consequence modelling. 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.

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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 <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 technical and scientific information that is consistently treated as confidential by Cameco and was provided by Cameco to the CNSC. The document 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 technical detail in the public interest.</p>

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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 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>

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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 <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)(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 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>

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6.	Cameco Corporation, Port Hope Conversion Facility, Fire Safety 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 <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 Fire Safety Plan includes detailed information on facility layout, building use, hazard locations, critical utilities, emergency power arrangements, fire detection and suppression systems, and responder access routes.</p> <p>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.</p>
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, <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)	<p>Rationale for Confidentiality (Rule 12)</p> <p>This document contains a detailed inventory of radioisotope sources, including exact physical locations, device identifiers, radionuclide types, and activity levels.</p> <p>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.</p>

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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, <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)	<p>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, and direct contact details of key personnel.</p> <p>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.</p>
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, <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)	<p>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.</p> <p>Disclosure of this information would provide 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>

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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 <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 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. Public disclosure would reveal assumptions, boundaries, dependencies, and response timelines, including potential windows 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.</p>

Attestation:

1. I confirm that the above-noted material is not available through any public sources.
2. I have attached a **summary** or **redacted** version of the material that minimally impairs the public nature of this proceeding.
3. I understand that if this request is not approved by the Commission, I will have the option of withdrawing the material.
4. I further understand that if the material is not withdrawn it will be part of the public record as per rule 15 of the Rules.
5. 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.

Attachments:

- Cameco Corporation, Port Hope Conversion Facility, Internal Dosimetry Technical Basis Document
- Cameco Corporation, Port Hope Conversion Facility, Safety Report
- Cameco Corporation, Port Hope Conversion Facility, Derived Release Limit
- Cameco Corporation, Port Hope Conversion Facility, Preliminary Decommissioning Plan and Financial Guarantee
- Cameco Corporation, Port Hope Conversion Facility, Security Plan

Authorized signature:



R. Liam Mooney

Senior Vice-President and Chief Legal Officer

April 14, 2026

Date